



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 530

DATE: 9/27/78

FILMED BY: YMB



7804006469

FEDERAL ELECTION COMMISSION

*Duplicates*

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- |  |   |
|--|---|
| <input type="checkbox"/> (1) Classified Information                                | <input type="checkbox"/> (6) Personal privacy                             |
| <input type="checkbox"/> (2) Internal rules and practices                          | <input type="checkbox"/> (7) Investigatory files                          |
| <input type="checkbox"/> (3) Exempted by other statute                             | <input type="checkbox"/> (8) Banking Information                          |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input type="checkbox"/> (5) Internal Documents                                    |   |

Signed

*Christopher Y. Brown*

date

*Sept. 12, 1978*

FEC 9-21-77

*MUR 530*

78040064694



FEDERAL ELECTION COMMISSION

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

September 11, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Nathan Landow  
7220 Arrowood Road  
Bethesda, Maryland 20034

RE: MUR 530

Dear Mr. Landow,

On August 28, 1978, the Commission approved the conciliation agreement which was signed by you on August 9, 1978. Accordingly I have signed the agreement on behalf of the Commission. The conciliation agreement in effect closes this matter. A copy of it is enclosed for your information.

Sincerely,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker  
General Counsel

Enclosure

Conciliation Agreement

78040064695

RECEIVED  
FEDERAL ELECTION  
COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION  
July 17, 1978

78 AUG 14 AM 9:39

In the Matter of )  
 ) MUR 530 (78)  
Nathan Landow )

CONCILIATION AGREEMENT

WHEREAS, pursuant to 2 U.S.C. §437g(a)(2) and (5), the Federal Election Commission (hereinafter "The Commission") has made findings of reason to believe and reasonable cause to believe that Nathan Landow (hereinafter "Respondent") violated 2 U.S.C. §441(a)(3) and 2 U.S.C. §441a(a)(1)(B);

The Commission and Respondent, pursuant to 2 U.S.C. §437g (a)(5)(A), do hereby resolve and conciliate the above-captioned matter under review by agreeing as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter under review pursuant to 2 U.S.C. §§437d(a)(10) and 437g.
- II. The pertinent facts are as follows:
  - A. Respondent's political contributions for calendar year 1977 amounted to \$25,420.
  - B. Respondent contributed \$20,170 in 1977 to the Democratic National Committee and its affiliates, The Democratic Finance Committee and the Association of State Democratic Chairpersons.

WHEREAS, Respondent agrees that:

- A. Respondent's contributions in 1977 of \$25,420 violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.

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- B. Respondent's contributions amounting to \$20,170 to the Democratic Finance Committee, the Democratic National Committee, and the Association of Democratic Chairpersons violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party.
- C. Pursuant to 2 U.S.C. §437g(a)(6), Respondent agrees to pay \$100 as a civil penalty within thirty (30) days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.

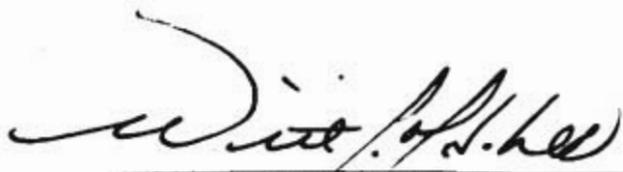
IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matters involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).

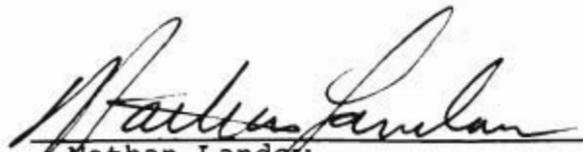
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B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and The Commission has approved the entire agreement.

9/8/78  
Date

  
William C. Oldaker  
General Counsel  
Federal Election Commission

8/9/78  
Date

  
Nathan Landow  
Respondent

78040064693



August 24, 1978

MEMORANDUM TO: Marge Hanson  
FROM: Elissa T. Garry  
SUBJECT: MUR 530

Please have the attached Memo and conciliation agreement in MUR 530 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040064700



FEDERAL ELECTION COMMISSION

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

August 24, 1978

MEMORANDUM

TO: THE COMMISSION

FROM: WILLIAM C. OLDAKER *W.C. Oldaker*

SUBJECT: MUR 530 Conciliation Agreement

The Reports Analysis Division referred this matter to the General Counsel's office. On April 13, 1978, the Commission found reason to believe that Nathan Landow violated Sections 441a(a)(3) and 441a(a)(1)(B) of the Act. It appeared that Mr. Landow exceeded both his aggregate \$25,000 annual contribution limitation for 1977 and his \$20,000 annual contribution limitation to political committees established and maintained by a national political party. The Commission also found reason to believe that the Democratic Finance Committee knowingly accepted excess contributions from Landow at the same time.

After further investigation it appeared that Mr. Landow did indeed exceed his contribution limitations, but that they were not knowingly accepted by the Democratic Finance Committee. Accordingly, on July 27, 1978 the Commission found reasonable cause to believe that Mr. Landow violated Sections 441a(a)(3) and 441a(a)(1)(B) of the Act and no reasonable cause to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f). The Commission also approved the attached conciliation agreement.

Since then Mr. Landow has signed the conciliation agreement and returned it to the Commission with a check for \$100.00, the amount of the civil penalty. We received this communication on August 14, 1978. Mr. Landow has been fully cooperative in our efforts to settle this matter.

The Office of General Counsel therefore recommends that the attached conciliation agreement which had been approved by the Commission on July 27, 1978 be signed and that this matter be closed.

78040764701

Tow

100-4491

RECEIVED  
FEDERAL ELECTION  
COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION  
July 17, 1978

AUG 14 AM 9:33

In the Matter of )  
 ) MUR 530 (78)  
Nathan Landow )

CONCILIATION AGREEMENT

WHEREAS, pursuant to 2 U.S.C. §437g(a)(2) and (5), the Federal Election Commission (hereinafter "The Commission") has made findings of reason to believe and reasonable cause to believe that Nathan Landow (hereinafter "Respondent") violated 2 U.S.C. §441(a)(3) and 2 U.S.C. §441a(a)(1)(B);

The Commission and Respondent, pursuant to 2 U.S.C. §437g(a)(5)(A), do hereby resolve and conciliate the above-captioned matter under review by agreeing as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter under review pursuant to 2 U.S.C. §§437d(a)(10) and 437g.
- II. The pertinent facts are as follows:
  - A. Respondent's political contributions for calendar year 1977 amounted to \$25,420.
  - B. Respondent contributed \$20,170 in 1977 to the Democratic National Committee and its affiliates, The Democratic Finance Committee and the Association of State Democratic Chairpersons.

WHEREAS, Respondent agrees that:

- A. Respondent's contributions in 1977 of \$25,420 violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.

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- B. Respondent's contributions amounting to \$20,170 to the Democratic Finance Committee, the Democratic National Committee, and the Association of Democratic Chairpersons violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party.
- C. Pursuant to 2 U.S.C. §437g(a)(6), Respondent agrees to pay \$100 as a civil penalty within thirty (30) days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matters involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).

7 3 0 4 0 0 6 4 7 0 3

B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and The Commission has approved the entire agreement.

\_\_\_\_\_  
Date

*8/9/78*

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

*Nathan Landow*  
\_\_\_\_\_  
Nathan Landow  
Respondent

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8995

August 11 1978 15-3 540

LANDOW & CO.  
BUILDERS - PROPERTY MANAGEMENT  
4710 BETHESDA AVENUE  
BETHESDA, MARYLAND 20014

Treasury of the United States \$100.00  
THE SUM 100 DOLLARS DOLLARS

LANDOW & CO.

The RIGGS NATIONAL BANK  
of WASHINGTON D.C.  
FRIENDSHIP OFFICE  
WISCONSIN AVE. & WARREN ST., N. W.

AMOUNT	100.00
TOTAL OF INVOICES	
LESS DISCOUNT	
LESS FREIGHT	
LESS	
TOTAL DEDUCTIONS	
AMOUNT OF CHECK	

⑆00008995⑆ ⑆0540⑆0003⑆ 07⑆0804⑆7583⑆

LANDOW & Co. . . . . BUILDERS

BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

FEDERAL ELECTION  
COMMISSION



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

Attn: Mr. William C. Oldaker  
General Counsel

7804006470



FEDERAL ELECTION COMMISSION

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

August 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. J. D. Nelson, Treasurer  
Democratic Finance Committee  
1625 Massachusetts Avenue, N.W.  
Washington, D.C. 20036

RE: MUR 530 (78)

Dear Mr. Nelson:

The Commission has determined after an investigation to close this matter as to the acceptance of excess contributions by your committee and its affiliate, the Democratic National Committee, from Mr. Nathan Landow in violation of 2 U.S.C. §441a(f). A copy of the Commissioner's certification is enclosed for your information.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "William C. Oldaker".

William C. Oldaker  
General Counsel

Enclosure

MUR 530 - TOW

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:  
 J.D. Nelson, Treas.  
 Wamp. Fin. Corp.  
 1620 Trans. Bldg. B.C. 20036

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 943953

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: 8/4/78 POSTMARK

5. ADDRESS (Complete only if requested)  
 402 51

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

August 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Nathan Landow  
7220 Arrowood Road  
Bethesda, Maryland 20034

RE: MUR 530

Dear Mr. Landow:

On July 27, 1978, the Commission determined there was reasonable cause to believe that you committed a violation of 2 U.S.C. §§441a(a)(3) and 441a(a)(1)(B) of the Federal Election Campaign Act of 1971, as amended. The Commission found reasonable cause to believe that you violated Section 441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977. Also the Commission found reasonable cause to believe that you violated Section 441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party in 1977. These political committees were the Democratic National Committee, the Democratic Finance Committee, and The Association of State Democratic Chairpersons.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5000.00.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the amount of the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure

*Mark 530 - Tow*

PS Form 3811, Apr. 1977

● **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:  
*Nathan Landow  
7220 Arrowood  
Bethesda, Md. 20834*

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>943952</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE  Addressee  Authorized agent

*Mrs N Landow*

4. DATE OF DELIVERY  
*8-4-78 8/4/78*

5. ADDRESS (Complete only if requested)  
*7220 Arrowood Rd*

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS  
*DMK*

DC WEST BEH...  
POST OFFICE  
7  
1978  
U.S. MAIL  
USPO

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO : 1977-O-234-337

700 201  
802253

~~Handwritten~~  
LANDOW & Co. . . . . BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

April 26, 1978. 11:50

MUR 530

Attachment I

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

Attention: Mr. Conley Edwards

Dear Mr. Edwards:

In response to your letter of April 18, 1978,  
attached herewith is a list of the Political  
Contributions which Mr. Landow made during 1977.

Sincerely,  
*Millie Linn*  
Millie Linn

ML:gt  
cc: Mr. Cecil Cheeves  
Democratic National Committee

73040064711

# LANDOW & Co. . . . . BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

## POLITICAL CONTRIBUTIONS

1977

1-12-77	Association of States - Demo, Ch,	\$100.00	
1-12-77	Corcoran Reception D.N.C.	70.00	
1-14-77	David Cornwall for Congress	100.00	8 <sup>th</sup> Inc
1-14-77	Ken Holland for Congress	100.00	6 <sup>th</sup> S.C
2-14-77	Norman Rabineau (Blair Lee)	1,000.00	X
2-16-77	National Finance Committee	5,000.00	
4-1-77	Demo, Congr. Dinner Committee	5,000.00	
4-18-73	Jeanerette for Congress	1,000.00	6 <sup>th</sup> S.C
5-2-77	M. Michael Crømer/Larry Levitan	500.00	X
6-3-77	Demo, Nat'l. Comm.	10,000.00	
6-13-77	Davis for Congress	500.00	12 <sup>th</sup> S.C
7-18-77	Citizens for Davis	200.00	8 <sup>th</sup> Md.
8-10-77	The Venetoulis Political Committee	1,000.00	X
9-23-77	Demo. House & Senate Council	125.00	
10-5-77	Moakley for Congress	200.00	9 <sup>th</sup> Mas
11-4-77	Demo. House & Senate Council	125.00	
12-6-77	Demo. Nat'l. Committee	5,000.00	
		<u>\$30,020.00</u>	

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- B. Respondent's contributions amounting to \$20,170 to the Democratic Finance Committee, the Democratic National Committee, and the Association of Democratic Chairpersons violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party.
- C. Pursuant to 2 U.S.C. §437g(a)(6), Respondent agrees to pay \$100 as a civil penalty within thirty (30) days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matters involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).

7 3 0 4 0 0 6 4 7 1 5

B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and The Commission has approved the entire agreement.

\_\_\_\_\_  
Date

\_\_\_\_\_  
William C. Oldaker  
General Counsel  
Federal Election Commission

\_\_\_\_\_  
Date

\_\_\_\_\_  
Nathan Landow  
Respondent

7 3 0 4 0 0 6 4 7 1 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Nathan Landow )  
Democratic National Committee )  
Democratic Finance Committee )

MUR 530 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 27, 1978, the Commission determined by a vote of 5-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(3).
2. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(1)(B).
3. Find no reasonable cause to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f).
4. Approve the conciliation agreement with Mr. Nathan Landow as set forth in the attachment to the General Counsel's Report signed July 21, 1978.
5. Send the letters attached to the General Counsel's Report signed July 21, 1978.

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

Attest:

7/31/78

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary to the Commission

73040064717

BEFOEE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Nathan Landow	)	MUR 530 (78)
Democratic National Committee	)	
Democratic Finance Committee	)	

GENERAL COUNSEL'S REPORT

BACKGROUND

On April 13, 1978, the Commission found reason to believe that Nathan Landow violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977; that Nathan Landow violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party; and that the Democratic Finance Committee violated 2 U.S.C. §441a(f) by knowingly accepting excess contributions from Mr. Landow.

On June 23, 1978, an Interim Report was distributed to the Commission on a 24 hour no objection basis. It was reported that it appeared that Nathan Landow did not exceed the \$20,000 contribution limitation imposed by 2 U.S.C. §441a(a)(1)(B) and that the Democratic Finance Committee (the DFC), an affiliate of the Democratic National Committee (the DNC), did not violate 2 U.S.C. §441a(f) by knowingly accepting excess contributions since there were none. It was also reported that apparently Nathan Landow violated 2 U.S.C. §441a(a)(3) by exceeding his annual \$25,000 contribution limitation in 1977 in the amount of \$2,520.

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ANALYSIS

Concerning Landow exceeding his \$25,000 annual contribution limit for 1977, it appears that although he did indeed exceed this contribution limit, it was by an amount less than previously thought. Section 441a(a)(3) of the Act sets forth the \$25,000 yearly contribution limitation for individuals. It also states that contributions made to a candidate in a year other than the calendar year in which the election is held with respect to which such contribution is made, are considered to be made during the calendar year in which such election is held.

As reported earlier, a letter listing Nathan Landow's political contributions for 1977 was received by the Commission on April 26, 1978 (see Attachment I). Included in the letter were contributions made in 1977 to the principal campaign committees of candidates for the United States House of Representatives. The total of these contributions amounted to \$2100.00. It appears that these funds would not apply to Landow's contribution limit for 1977 in light of Section 441a(a)(3) of the Act. Therefore, while it was previously thought that Landow exceeded his \$25,000 annual limitation by \$2,520 in 1977, it now appears that he exceeded his yearly contribution limit by only \$420 (\$2520 minus \$2100).

7 8 0 4 0 0 6 4 7 1 9

As for Landow exceeding the \$20,000 limit on contributions which he could make to the DFC, the DNC, and their affiliates, it appears that he did so in the amount of \$170.00. It was reported earlier that Landow contributed exactly \$20,000 to the DNC and its affiliates for 1977, thereby falling within the Act's contribution limitation. From the April 26, 1978 letter however, two contributions dated January 12, 1977 are listed as being made to affiliates of the DNC. They are \$70.00 to the "Corcoran Reception D.N.C." and \$100.00 to "Association of States - Demo. Ch." (Attachment I). Landow and the DNC informed the Commission in two letters dated June 26, 1978 and June 23, 1978 of a \$70.00 refund by the DNC to Landow for the Corcoran contribution. As for his \$100.00 contribution to the "Association of States - Dem. Ch.", Landow's bookkeeper, Ms. Millie Linn, confirmed in a July 13, 1978 telephone conversation that there was a check made out on that date to that party. The Association of State Democratic Chairpersons is a DNC affiliate (see Attachment II). Therefore, it appears that Landow did exceed his \$20,000 contribution limit for 1977 to the DNC and its affiliates in the amount of \$170.00.

Concerning a possible violation of 2 U.S.C. §441a(f) by the DNC and the DFC for knowingly accepting excess contributions, they claim they had no knowlege of this. A telephone conversation with Pat Whiteaker, controller at DNC headquarters on July 12, 1978, indicates that the contributions were not knowingly accepted. She stated that computer backups and other complications prevented their committees from detecting excess contributions.

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RECOMMENDATIONS

1. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(3).

2. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(1)(B).

3. Find no reasonable cause to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f).

4. Approve the attached conciliation agreement with Mr. Nathan Landow.

5. Send the attached letters.

7/21/78  
Date

  
William C. Oldaker  
General Counsel

78040064721



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. J. D. Nelson, Treasurer  
Democratic Finance Committee  
1625 Massachusetts Avenue, N.W.  
Washington, D.C. 20036

RE: MUR 530 (78)

Dear Mr. Nelson:

The Commission has determined after an investigation to close this matter as to the acceptance of excess contributions by your committee and its affiliate, the Democratic National Committee, from Mr. Nathan Landow in violation of 2 U.S.C. §441a(f). A copy of the Commissioner's certification is enclosed for your information.

Sincerely yours,

William C. Oldaker  
General Counsel

Enclosure

73040064722



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Nathan Landow\*  
7220 Arrowood Road  
Bethesda, Maryland 20034

RE: MUR 530

Dear Mr. Landow:

On , 1978, the Commission determined there was reasonable cause to believe that you committed a violation of 2 U.S.C. §§441a(a)(3) and 441a(a)(1)(B) of the Federal Election Campaign Act of 1971, as amended. The Commission found reasonable cause to believe that you violated Section 441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977. Also the Commission found reasonable cause to believe that you violated Section 441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party in 1977. These political committees were the Democratic National Committee, the Democratic Finance Committee, and The Association of State Democratic Chairpersons.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5000.00.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the amount of the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

78040064723

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

Sincerely,

William C. Oldaker  
General Counsel

Enclosure

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G.C.C.# 3951

LANDOW & Co. . . . . BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

78 JUN 28 4N 12:02

June 26, 1978

Mr. Chris Tow, Atty.  
Federal Election Commission  
1325 K Street N.W.  
Washington, D. C. 20463

*PO 4028*

Dear Sir:

Re: MUR 530  
Letter April 18, 1978

In response to your recent telephone call re the above matter, we contacted the Democratic National Committee and have received a refund from them per the copy of letter enclosed and check stub.

Please let me know if further action is necessary.

Very truly yours,

*Mildred S. Linn*

Mildred S. Linn, Bkkpr.  
for Nathan Landow

MSL:me  
Encl.

73040064725

DEMOCRATIC  
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-5900

June 22, 1978

Mr. Nathan Landow  
7220 Arrowood Road  
Bethesda, Md. 20034

Dear Mr. Landow:

It has come to our attention that you may have exceeded your 1977 annual contribution limitation to the Democratic National Committee and its affiliates by \$70.00. Consequently, we are enclosing a refund check to you for the same amount and have advised the Federal Election Commission of our action.

Sincerely,

*Patricia Whiteaker*

Patricia Whiteaker  
Controller

7 8 0 4 0 0 6 4 7 2 6

DEMOCRATIC NATIONAL COMMITTEE  
WASHINGTON, D.C. 20036

DETACH AND RETAIN THIS STATEMENT  
FOR YOUR RECORDS AND FOR PAYMENT OF TAXES. DISCARD BELOW  
IF NOT CORRECTLY DETACHED TO THE FEDERAL ELECTION COMMISSION RECEIPT SERVICE

DELUXE - FORM WVE-3 V-7

*6/23/78*

Contribution Refund

*70.<sup>00</sup>*





FEDERAL ELECTION COMMISSION

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

June 26, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *MWE*

SUBJECT: MUR 530 (78) - Interim Report dated 6-22-78  
Received in Office of Commission  
Secretary: 6-23-78, 11:29

The above-mentioned document was circulated on a 24  
hour no-objection basis at 4:00 p.m., June 23, 1978.

There were no objections to the Interim Report.

78040064728

June 23, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 530

Please have the attached Interim Report on  
MUR 530 distributed to the Commission on a 24 hour  
no-objection basis.

Thank you.

78040064729

BEFORE THE FEDERAL ELECTION COMMISSION  
June 22, 1978

In the Matter of )  
 )  
Nathan Landow ) MUR 530 (78)  
Democratic National Committee )  
Democratic Finance Committee )

INTERIM REPORT

BACKGROUND

MUR 530 is an internally generated matter which was referred to the Office of General Counsel on January 31, 1978 by the Reports Analysis Division. The parties involved are Nathan Landow, The Democratic National Committee and its affiliate, The Democratic Finance Committee. On April 17, 1978, the Commission found reason to believe that Nathan Landow violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party, that the Democratic Finance Committee violated 2 U.S.C. §441a(f) by knowingly accepting these excess contributions from Mr. Landow, and that Landow violated 2 U.S.C. §441a(a)(3) by exceeding his annual \$25,000 contribution limitation in 1977.

ANALYSIS

The controller of The Democratic National Committee (hereinafter the DNC) mailed a clarification letter which was received at the Commission on May 10, 1978. Enclosed with the letter was

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a corrected listing of Landow's contribution profile for 1977 to the DNC and to its affiliate, the Democratic Finance Committee (hereinafter the DFC). The aggregate total of his contributions to these affiliated committees including any loan guarantees amounted to exactly \$20,000. The listing included the reported release of Landow's guarantee on a loan to the DNC which was not originally computed into The First General Counsel's Report. The amount reportedly released was \$4,750.00. Landow was initially thought to have contributed \$4,750.00 over his 20,000 contribution limitation to the DNC and the DFC.

A review of reports filed by the DNC with the Commission confirms the information in the above mentioned clarification letter. A DNC 30 day report following a special election on February 22, 1977 reveals that Landow did guarantee a loan to the DNC from the National Bank of Washington. As the loan was being paid off, the original amount which Landow guaranteed diminished or was "released". The DNC's July 10, 1977 quarterly report reveals that all but \$4,750.00 remained unreleased on his loan guarantee. The DNC's August 27, 1977 special 10 day pre-election report shows that this loan was totally paid off with interest on July 14, 1977 and that all guarantees for this loan were released.

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It appears therefore, that Landow did not exceed his \$20,000 contribution limitation to political committees established and maintained by a national political in violation of 2 U.S.C. §441a(a)(1)(B). It also appears that the Democratic Finance Committee did not violate 2 U.S.C. §441a(f) by knowingly accepting excess contributions since there were none.

As for Nathan Landow exceeding his individual \$25,000 contribution limitation in 1977, it appears that he did indeed violate Section 441a(a)(3) of the Act. On April 26, 1978, the Commission received a letter from Landow's accountant, Ms. Millie Linn. Enclosed was a list of political contributions which Landow made during 1977. The list did not include the previously mentioned loan release in the amount of \$4750.00. It did include however, additional contributions to Federal candidates and committees which did not appear on the computer G-index for Landow used in The First General Counsel's report. These additional contributions amount to \$1,570.00. An updated computation of Landow's 1977 contributions is as follows:

\$30,700	original amount thought to have been contributed by Landow in 1977
<u>- 4,750</u>	amount of loan release not previously computed
\$25,950	
<u>+ 1,570</u>	additional contributions to Federal candidates and committees revealed in Landow's letter.
\$27,520	

It therefore appears that Landow contributed \$27,520 in 1977 to Federal candidates and committees or \$2,520 over his \$25,000 contribution limit.

78040064732

A June 14, 1978 telephone conversation with Ms. Millie Linn reveals that she has forwarded our correspondence with Landow to a Mr. Mike Greely, an attorney at the DNC. Further conversations with Ms. Linn and Mr. Landow are forthcoming. The Office of General Counsel will be prepared to recommend reasonable cause to believe that Landow violated 2 U.S.C. §441a(a)(3) and draft a conciliation agreement pending the outcome of these conversations.

Date

6/22/78

  
William C. Oldaker  
General Counsel

780400647333

PCC  
3901

DEMOCRATIC  
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-5900

RECEIVED  
FEDERAL ELECTION  
COMMISSION

'78 JUN 23 AM 11:37

June 22, 1978

803897

Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463  
Attn: Charles N. Steele

Re: Mr. Nathan Landow  
7220 Arrowood Road  
Bethesda, Md. 20034

Dear Commissioners:

It has come to our attention that the above mentioned individual, Mr. Nathan Landow, may have exceeded his 1977 annual contribution limitation to the Democratic National Committee and its affiliates. After review of our records we have noted the following contribution history:

<u>Date Received</u>	<u>Reporting Committee</u>	<u>Amount</u>
1-21-77	Democratic National Committee	70.00
4-8-77	Democratic Finance Committee	5000.00
6-16-77	Democratic Finance Committee	10000.00
12-7-77	Democratic Finance Committee	5000.00
	Total	20070.00

In light of this, we have refunded today to Mr. Landow \$70.00 which will be reflected in our June 30 disclosure report. If you have any questions, please call me.

Sincerely,

Patricia Whiteaker  
Controller

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DEMOCRATIC  
NATIONAL COMMITTEE  
1625 Massachusetts Ave., N.W.  
Washington, D.C. 20036

7-31406173

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

Attention: Charles N. Steele



JUN 23 AM 11:37

FEDERAL ELECTION COMMISSION

See  
3509

REC-102625  
FEDERAL ELECTION  
COMMISSION

DEMOCRATIC  
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-5900

'78 MAY 10 PM 12:36

May 8, 1978

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

Re: MUR 530  
Democratic Finance Committee

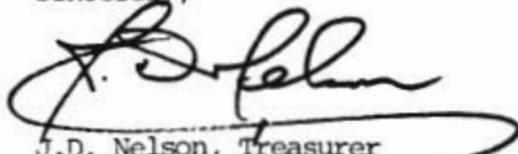
Dear Commissioners:

I am in receipt of your letter requesting clarification regarding a possible violation in respect to contributions reported in 1977 which appear to exceed the annual maximum limitations per donor for national parties.

It is apparent that the information upon which you have based this determination is incomplete. Attached is a corrected listing reflecting Mr. Landow's contribution profile.

Since this is the second request by the Commission regarding the same circumstances, it is advisable for your staff to review all cancelled guarantee amounts as other contributors' annual contribution aggregates may very well be overstated.

Sincerely,



J.D. Nelson, Treasurer  
Democratic Finance Committee

7 9 0 4 0 0 6 4 7 3 5

Nathan Landow

<u>Date</u>	<u>Amount</u>	<u>Committee</u>	<u>Aggregate</u>
1-27-77	\$20,000 (Loan Endorsement)	Democratic National Committee	\$20,000
3-4-77	-5,000.00 (Endorsement Released)	Democratic National Committee	\$15,000
3-31-77	-250.00 (Endorsement Released)	Democratic National Committee	\$14,750
4-8-77	\$5,000	Democratic Finance Committee	\$19,750
6-16-77	\$10,000	Democratic Finance Committee	\$29,750
6-21-77	-\$10,000 (Endorsement Released)	Democratic National Committee	\$19,750
7-14-77	-\$4,750*	Democratic National Committee	\$15,000
12-7-77	\$5,000	Democratic Finance Committee	\$20,000 Total Aggregate

\*Endorsement released; loan paid in full. See attached documentation.

7 8 0 4 0 0 6 4 7 3 7

Itemized Expenditures  
 Campaign Fundraising, Loans, and Transfers  
 for Lines 20, 22, 23, and/or 24 of FEC Form 3

(Use separate schedule(s) for each numbered line)

(see instructions on back)

Name of Candidate or Committee in full			
DEMOCRATIC NATIONAL COMMITTEE <i>10 days pre Louisiana</i>			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
National Bank of Washington 14th and G Streets, N.W. Washington, D.C.	Loan repay & Interest	7-14-77	81,437.92 *
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Boatmens National Bank of St. Louis Box 236 St. Louis, Mo.	Loan Repay & Interest	7-12-77	30,510.21
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Committee for TAPE P.O. Box 32287 San Antonio, TX 78284	Contribution Refund (Over limit)	8-22-77	140.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period

7 2 0 4 0 0 6 4 7 3 8

**Schedule A**  
 July 1976  
 Federal Election Commission  
 27 Street, N.W.  
 Washington, D.C. 20463

**Itemized Receipts,  
 Contributions, Ticket Purchases, Loans,  
 Rebates, and Transfers for Line  
 Numbers 15, 16, 17 and/or 18 of FEC Form 3**  
 (see instructions on back)

Page 1 of 1 for  
 LINE NUMBER 16  
 (Use separate schedule(s) for each  
 numbered line)

700054739

Name of Candidate or Committee in full <b>DEMOCRATIC NATIONAL COMMITTEE</b>		<i>10 day pay - Louisiana</i>	
Full Name, mailing address and ZIP code A loan secured from the National Bank of Washington, Washington D.C., and from Boatmens National Bank of St. Louis, Box 236, St. Louis Missouri have been paid in full as reported on line 22 of this report.		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ..... ▶ \$		
Full Name, mailing address and ZIP code All guarantees for this loan as previously disclosed have been released.		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ..... ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ..... ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ..... ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ..... ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation		
	<input type="checkbox"/> Check if Contributor is self-employed		
	Aggregate Year-to-date ..... ▶ \$		
Subtotal of receipts this page (optional) .....			▶ \$

DEMOCRATIC  
NATIONAL COMMITTEE  
1625 Massachusetts Ave., N.W.  
Washington, D.C. 20036

7 9 0 4 0 0 6 4 7 4 0

RECEIVED  
FEDERAL ELECTION  
COMMISSION



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

MAY 10 PM 12:36

DEMOCRATIC  
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-5900

RECEIVED  
FEDERAL ELECTION

Doc 3404

78 MAY 1 P 4: 43

April 27, 1978

802330

Mr. Conley Edwards, Jr.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

Re: MUR 530

Dear Mr. Edwards:

We are in receipt of your notification number MUR 530  
and will submit a detailed response upon receipt of  
more specific information from your office.

Sincerely,



Patricia Whiteaker

78040064741

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DEMOCRATIC  
NATIONAL COMMITTEE  
1625 Massachusetts Ave., N.W.  
Washington, D.C. 20036

WASHINGTON  
P.M. 1  
23 APR  
1978



Mr. Conley Edwards, Jr.  
Federal Election Commission  
1325 K Street, N.W.  
Washington, D.C. 20463

18 MAY 1 4:43 PM

RECEIVED  
FEDERAL ELECTION  
COMMISSION

YCC 3389  
802253

~~Handwritten~~  
LANDOW & Co. . . . . BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

April 26, 1978

MUR 530

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

Attention: Mr. Conley Edwards

Dear Mr. Edwards:

In response to your letter of April 18, 1978,  
attached herewith is a list of the Political  
Contributions which Mr. Landow made during 1977.

Sincerely,  
*Millie Linn*  
Millie Linn

ML:gt  
cc: Mr. Cecil Cheeves  
Democratic National Committee

7 3 0 4 0 0 6 4 7 4 3

# LANDOW & Co. . . . . BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

## POLITICAL CONTRIBUTIONS

1977

1-12-77	Association of States - Demo. Ch,	\$100.00	
1-12-77	Corcoran Reception D.N C.	70.00	
1-14-77	David Cornwall for Congress	100.00	8 <sup>th</sup> Ind
1-14-77	Ken Holland for Congress	100.00	5 <sup>th</sup> S.C
2-14-77	Norman Rabineau (Blair Lee)	1,000.00	
2-16-77	National Finance Committee	5,000.00	
4-1-77	Demo. Congr. Dinner Committee	5,000.00	
4-18-73	Jeanerette for Congress	1,000.00	6 <sup>th</sup> S.C
5-2-77	M. Michael Crømer/Larry Levitan	500.00	
6-3-77	Demo. Nat'l. Comm.	10,000.00	
6-13-77	Davis for Congress	500.00	
7-18-77	Citizens for Davis	200.00	
8-10-77	The Venetoulis Political Committee	1,000.00	
9-23-77	Demo. House & Senate Council	125.00	
10-5-77	Moakley for Congress	200.00	9 <sup>th</sup> Mass
11-4-77	Demo. House & Senate Council	125.00	
12-6-77	Demo. Nat'l. Committee	5,000.00	
		<u>5,000.00</u>	
		\$30,020.00	

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FEDERAL ELECTION COMMISSION

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

April 18, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Nathan Landow  
7220 Arrowood Road  
Bethesda, Maryland 20034

Re: MUR 530

Dear Mr. Landow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").

Specifically, it appears that you violated 2 U.S.C. §441a(a)(3) by exceeding the annual \$25,000.00 contribution limitation for an individual. Also, reports filed with the Commission show that you contributed in excess of \$20,000.00 in 1977 to political committees established by a national political party (the Democratic National Committee and the Democratic Finance Committee) in violation of 2 U.S.C. §441a(a)(1)(B). We have numbered this matter MUR 530.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Conley Edwards, Jr., the staff member assigned to this matter, at



78040064745

202-523-4143.

This matter will remain confidential in accordance with 2 U.S.C. section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker  
General Counsel

Charles N. Steele  
Associate General Counsel

7 8 0 4 0 0 6 4 7 4 6

PS Form 3811, Apr. 1977

530 Canadian

● 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 ..... c  
 Show to whom, date, and address of delivery ..... c  
 RESTRICTED DELIVERY  
 Show to whom and date delivered ..... c  
 RESTRICTED DELIVERY.  
 Show to whom, date, and address of delivery. \$ \_\_\_\_  
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:  
 Nathan Landow

3. ARTICLE DESCRIPTION:  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
 \_\_\_\_\_ 443694 \_\_\_\_\_

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY  
 4-19-78

5. ADDRESS (Complete only if requested)  
 7220 Arroyo Rd  
 Beth, MD 20834

6. UNABLE TO DELIVER BECAUSE: \_\_\_\_\_ INITIALS \_\_\_\_\_

APR 19 1978  
 U.S. POSTMAN OFFICE  
 BETHESDA, MD

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

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

April 18, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

J.D. Nelson, Treasurer  
Democratic Finance Committee  
1625 Massachusetts Ave., N.W.  
Washington, D.C. 20036

Re: MUR 530

Dear Mr. Nelson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Democratic Finance Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your committee and your affiliate, the Democratic National Committee, accepted contributions in excess of the \$20,000.00 limitation of 2 U.S.C. §441a(a) (1)(B) from Mr. Nathan Landow in violation of 2 U.S.C. §441a(f). We have numbered this matter MUR 530.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Conley Edwards, Jr., staff member assigned to this matter, at 202-523-4143.



7 8 0 4 0 0 6 4 7 4 7

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a) (3) (B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker  
General Counsel

Charles N. Steele  
Associate General Counsel

*LAWRENCE 63D*

73 Form 3811, Apr. 1977

● SENDER: Complete items 1, 2, and 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
- 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:  
*J. D. Nelson, Treas  
Dem Finance Comm*

3. ARTICLE DESCRIPTION:  
REGISTERED NO. | CERTIFIED NO. | INSURED NO.  
| *443.707* |

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE  Addressee  Authorized agent  
*S. H. McWood*

4. DATE OF DELIVERY: *APR 19 1979* POSTMARK: *61 APR*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS: *KMS*

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Nathan Landow )  
Democratic National Committee )  
Democratic Finance Committee )

MUR 530 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 13, 1978, at an Executive Session of the Federal Election Commission at which a quorum was present, the Commission determined by a vote of 4-1 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find reason to believe that Mr. Nathan Landow violated 2 U. S. C. Section 441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.
2. Find reason to believe that Mr. Nathan Landow violated 2 U.S.C. Section 441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party.
3. Find reason to believe that the Democratic Finance Committee violated 2 U.S.C. Section 441a(f) by accepting excess contributions from Mr. Nathan Landow.
4. Send the draft letters attached to the General Counsel's Report.

Voting for this determination were Commissioners Aikens, Harris, Springer, and Staebler. Commissioner Tiernan cast a dissenting vote. Commissioner Thomson was not present at the time of the vote.

*Marjorie W. Emmons*

Marjorie W. Emmons  
Secretary to the Commission

Date: April 17, 1978

General Counsel's Reported dated March 30, 1978  
Received in Office of Commission Secretary and circulated March 30, 1978  
Objection filed March 31  
Placed on meeting agenda for April 6, 1978, and tabled that date.  
Placed on meeting agenda for April 13, 1978 and acted upon as noted above.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Nathan Landow )  
Democratic National Committee )  
Democratic Finance Committee )

MUR 530 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 13, 1978, at an Executive Session of the Federal Election Commission at which a quorum was present, the Commission failed to pass the following motion in the above-captioned matter:

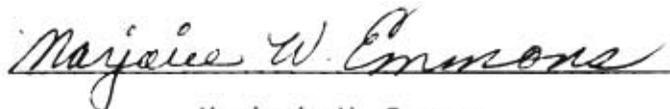
MOVED:

That MUR 530 (78) be returned to the Office of the General Counsel with the direction that it be referred to the Reports Analysis Division for handling under present procedures for analyzing surface violations, taking into consideration the procedures in effect at the time of the alleged violation.  
The vote was:

YEA (2) Commissioners Tiernan and Staebler

NAY (3) Commissioners Aikens, Harris, and Springer.

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



Marjorie W. Emmons  
Secretary to the Commission

Date: April 17, 1978

79040064750



FEDERAL ELECTION COMMISSION

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

March 31, 1978

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *MWE*  
SUBJECT: OBJECTIONS

The following MURs circulated on a 24 hour no-objection basis have received objections from Commissioner Tiernan:

MUR 525 (78) - 1st GC Report dated 3-30-78  
MUR 527 (78) - 1st GC Report dated 3-30-78  
MUR 530 (78) - 1st GC Report dated 3-30-78  
MUR 536 (78) - 1st GC Report dated 3-30-78  
MUR 541 (78) - 1st GC Report dated 3-30-78 re-circulated 3-31-78  
MUR 551 (78) - 1st GC Report dated 3-30-78

These items have been placed on the Executive Session  
Agenda for April 6, 1978

March 30, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 530

Please have the attached 7 day report on MUR 530 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040064752

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL MAR 30 1978  
BY OGC TO THE COMMISSION \_\_\_\_\_

MUR NO. 530  
DATE COMPLAINT RECEIVED \_\_\_\_\_  
BY OGC \_\_\_\_\_  
STAFF \_\_\_\_\_  
MEMBER C. Edwards

SOURCE OF MUR: Referred from Reports Analysis (Attachment I)

RESPONDENTS' NAMES: Nathan Landow  
Democratic National Committee  
Democratic Finance Committee

RELEVANT STATUTE: 2 U.S.C. §441a(a)(3)  
2 U.S.C. §441a(a)(1)(B)  
2 U.S.C. §441a(f)

INTERNAL REPORTS CHECKED: Democratic National Committee, Democratic Finance  
Committee, G. Index. (23 February 1978)

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Reports Analysis referred this matter to the Office of General Counsel after review of the reports of the Democratic Finance Committee and the Democratic National Committee showed that Mr. Nathan Landow may have exceeded the \$20,000.00 annual contribution limitation of 2 U.S.C. §441a(a)(1)(B). Also, the G. Index shows that Mr. Landow may have exceeded the \$25,000 annual contribution limitation of 2 U.S.C. §441a(a)(3). (Attachment II).

It also appears that the Democratic Finance Committee and the Democratic National Committee (which are affiliated committees) (Attachment III & IV) may have accepted excess contributions from Landow in violation of 2 U.S.C. §441a(f).

PRELIMINARY LEGAL ANALYSIS

The G. Index and the reports of the Democratic Finance Committee and the Democratic National Committee disclosed the following contributions from Mr. Landow for the 1977 calendar year.

73040054753

1977 AGGREGATE CONTRIBUTIONS MADE BY NATHAN LANDOW

<u>Date of Contribution</u>	<u>Committee</u>	<u>Amount of Contrib. or Refund *</u>	<u>Balance</u>
1-27-77	Democratic National Committee	\$ 20,000	\$ 20,000
3-4-77	Democratic National Committee	(5,000)	15,000
3-31-77	Democratic National Committee	(250)	14,750
4-8-77	Democratic Finance Committee	5,000	19,750
4-12-77	Democratic Congressional Dinner Committee	5,000	24,750
6-13-77	Davis for Congress Committee	500	25,250
6-16-77	Democratic Finance Committee	10,000	35,250
6-21-77	Democratic Finance Committee	(10,000)	25,250
7-21-77	Citizens For Davis for Congress	200	25,450
10-10-77	Democratic House & Senate Council	125	25,575
11-18-77	Democratic House & Senate Council	125	25,700
12-7-77	Democratic Finance Committee	5,000	30,700

1977 AGGREGATE CONTRIBUTIONS MADE BY NATHAN LANDOW TO NATIONAL PARTY POLITICAL COMM.

1-27-77	Democratic National Committee	20,000	20,000
3-4-77	Democratic National Committee	(5,000)	15,000
3-31-77	Democratic National Committee	(250)	14,750
4-8-77	Democratic Finance Committee	5,000	19,750
6-16-77	Democratic Finance Committee	10,000	29,750
6-21-77	Democratic Finance Committee	(10,000)	19,750
12-7-77	Democratic Finance Committee	5,000	24,750

Contributions refunded to Nathan Landow are shown in parenthesis.

2 U.S.C. §441a(a)(3) states that no individual shall make contributions aggregating more than \$25,000 in any calendar year. 2 U.S.C. §441a(a)(1)(B) states that no person shall make contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000. It appears that Mr. Landow violated 2 U.S.C. §441a(a)(3) by contributing in excess of \$25,000 in 1977; and Mr. Landow violated 2 U.S.C. §441a(a)(1)(B) by contributing in excess of \$20,000 to the Democratic National Committee, and its affiliate, the Democratic Finance Committee.

2 U.S.C. §441a(f) states that no political committee shall knowingly accept any contribution in violation of 2 U.S.C. §441a. Although the reports indicate that these committees may have attempted to comply with the Act by refunding some contributions to Mr. Landow, it appears that the Democratic Finance Committee nevertheless did accept a contribution from Mr. Landow which, when added to Mr. Landow's contributions to the Democratic National Committee, exceeded \$20,000 in the aggregate. We believe that the Commission should find reason to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f) by accepting that contribution and obtain the committees explanation of such acceptance.

RECOMMENDATIONS

1. Find reason to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.

2. Find reason to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000.00 annual contribution limitation to political committees established and maintained by a national political party.

3. Find reason to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f) by accepting excess contributions from Mr. Nathan Landow.

4. Send attached letters.

7 3 0 1 0 7 6 4 7 5 5

Attachment I  
MUR 530(78)  
D-10

Ref. O.G.C.

CRP

2/14/78



FEDERAL ELECTION COMMISSION

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

FEBRUARY 2, 1978

MEMORANDUM

TO: ORLANDO B. POTTER

THROUGH: LOIS ZELLA *LZ*

FROM: IRENE ALLEN *ja*

SUBJECT: ONE POSSIBLE VIOLATION OF 2 U.S.C. §441a(a)(3) and §441a(a)(1)(B)

Attached is a revised schedule (Attachment 1) of contributions made by one individual to Federally registered political committees during the calendar year 1977. Please note that one column, labeled "Aggregate Year-To-Date for Democratic National Committees," aggregates the contributions made by the individual that fall under the limitations of §441a(a)(1)(B). The other column, labeled "Aggregate Year-To-Date for Individual," aggregates all contributions made by the individual that fall under the limitations of §441a(a)(3). The aggregate year-to-date total of contributions under the limitations of §441a(a)(1)(B) as of 6/21/77, the date of the last contribution reported, is \$19,750. The aggregate year-to-date total of contributions under the limitations of §441a(a)(3) as of 6/21/77, is \$24,750.

If you have any further questions on this matter, please do not hesitate to contact Carroll Bowen of the Party Team.

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## FEDERAL ELECTION COMMISSION

DATE 23FEB73

SELECTED LIST OF RECEIPTS & EXPENDITURES (O)  
SECTION I - INDIVIDUALS

PAGE 24

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE ELECTION	AMOUNT
LANDMAN, DORIS KENT COUNTY REPUBLICAN FINANCE COMMITTEE 77FEC/052/2846 #035616 CONTRIBUTION	2640 BOSTON SE	GRAND RAPIDS HOUSEWIFE	MI 49506	8FEB77 PRIMARY APRIL 10 QUARTERLY	300
LANDMAN, LOU MUSKEGON COUNTY REPUBLICAN FINANCE COMMITTEE 77FEC/057/4403 #035527 CONTRIBUTION	749 HOULTON AVE	N MUSKEGON HACKLEY UNION BANK BLDG	MI 49445	20JUN77 PRIMARY JULY 10 QUARTERLY	250 AMENDMENT
LANDHESSER, W. E. JR. DR. & MRS. FRIENDS OF MARJORIE HOLT COMMITTEE 78HDE/129/3857 #067859 CONTRIBUTION	4 MILKSHAKE LANE	ANNAPOLIS SELF-EMPLOYED	MD 21404	10EC77 PRIMARY YEAR END REPORT	125
LANDOLT, GENE KENTUCKY STATE DEMOCRATIC CENTRAL EXECUTIVE COMMITTEE 77FEC/050/0715 #023902 CONTRIBUTION	BOX 428	MURRAY GENE LANDOLT INS. AGENCY	KY 42071	1JUL77 PRIMARY OCTOBER 10 QUARTERLY	500
LANDON, GLENDA L. DR. DEMOCRATIC PARTY OF WISCONSIN 78FEC/066/4357 #069142 CONTRIBUTION	1506 LONGVIEW ST.	MADISON WIS. NORTH CENTRAL ASSOCIATION	WI 53704	30NOV77 PRIMARY YEAR END REPORT	250
LANDOW, BARBARA DEMOCRATIC NATIONAL COMMITTEE 78FEC/065/3425 #064150 CONTRIBUTION	4710 BETHESDA AVE.	BETHESDA	MD 20014	60EC77 PRIMARY YEAR END REPORT	1,640
LANDOW, NATHAN DAVIS FOR CONGRESS COMMITTEE 77HDE/124/1908 #016199 CONTRIBUTION	4710 BETHESDA AVE	BETHESDA BUILDER AND DEVELOPER	MD 20014	13JUN77 GENERAL JULY 10 QUARTERLY	500
LANDOW, NATHAN DEMOCRATIC FINANCE COMMITTEE 77FEC/053/1014 #005074 CONTRIBUTION	4710 BETHESDA AVE.	BETHESDA LANDOW & CO.	MD 20014	8APR77 GENERAL 10 DAY PRE-ELECTION	5,000
LANDOW, NATHAN DEMOCRATIC FINANCE COMMITTEE 77FEC/055/1968 #009437 CONTRIBUTION	4710 BETHESDA AVE.	BETHESDA LANDOW & CO.	MD 20014	16JUN77 PRIMARY JULY 10 QUARTERLY	10,000
LANDOW, NATHAN DEMOCRATIC FINANCE COMMITTEE 78FEC/065/3243 #066218 CONTRIBUTION	4710 BETHESDA AVENUE	BETHESDA LANDOW & COMPANY	MD 20014	7DEC77 PRIMARY YEAR END REPORT	5,000
LANDOW, NATHAN DEMOCRATIC NATIONAL COMMITTEE 77FEC/055/1896 #008775 LOAN REP TO INDIVIDUAL	7220 ARROWOOD	BETHESDA	MD 20024	21JUN77 PRIMARY JULY 10 QUARTERLY	10,000-

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)  
SECTION I - INDIVIDUALS

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE	ELECTION	AMOUNT
LANDOW, NATHAN CITIZENS FOR DAVIS FOR CONGRESS 77HRE/125/5398 #060170 CONTRIBUTION	7220 ARROWOOD RD.	BETHESDA SELF-EMPLOYED	MD 20034	21JUL77 OCTOBER 10	PRIMARY QUARTERLY	200
LANDOW, NATHAN DEMOCRATIC CONGRESSIONAL DINNER COMMITTEE 77FEC/055/2258 #011814 CONTRIBUTION	7220 ARROWOOD ROAD	BETHESDA LANDOW & COMPANY	MD 20034	12APR77 JULY 10	PRIMARY QUARTERLY	5,000
LANDOW, NATHAN DEMOCRATIC HOUSE & SENATE COUNCIL 78FEC/063/1641 #046058 CONTRIBUTION	7220 ARROWOOD ROAD	BETHESDA SELF-EMPLOYED	MD 20034	10OCT77	PRIMARY YEAR END REPORT	125
LANDOW, NATHAN DEMOCRATIC HOUSE & SENATE COUNCIL 78FEC/063/1641 #046062 CONTRIBUTION	7220 ARROWOOD ROAD	BETHESDA SELF-EMPLOYED	MD 20034	18NOV77	PRIMARY YEAR END REPORT	125
LANDOW, NATHAN DEMOCRATIC NATIONAL COMMITTEE 77FEC/050/1054 #006323 LOAN FROM INDIVIDUAL	7220 ARROWOOD ROAD	BETHESDA LANDOW & CO.	MD 20034	27JAN77	GENERAL 30 DAY POST-ELECTION	20,000
LANDOW, NATHAN DEMOCRATIC NATIONAL COMMITTEE 77FEC/050/1054 #006593 LOAN REP TO INDIVIDUAL	7220 ARROWOOD ROAD	BETHESDA	MD 20034	4MAR77	GENERAL 30 DAY POST-ELECTION	5,000-
LANDOW, NATHAN DEMOCRATIC NATIONAL COMMITTEE 77FEC/051/1084 #005617 LOAN REP TO INDIVIDUAL	7220 ARROWOOD ROAD	BETHESDA	MD 20034	31MAR77	PRIMARY APRIL 10 QUARTERLY	250-
LANDOW, NATHAN JIM WRIGHT MAJORITY CONGRESS COMMITTEE 78HRE/130/1115 #071530 CONTRIBUTION	7220 ARROWOOD ROAD	BETHESDA SELF-EMPLOYED	MD 20034	9JAN78	PRIMARY FEBRUARY MONTHLY	2,000
ANDREWS, JOHN L. JR. JOHNSTON SENATE COMMITTEE 76SEN/002/0265 #070775 CONTRIBUTION	6049 FOX CHASE TRAIL	SHREVEPORT EVANS & LANDREN	LA 71109	21DEC77	PRIMARY YEAR END REPORT	1,000
LANDRENEAU, L.E. JOHNSTON SENATE COMMITTEE 77SEN/005/0306 #022504 CONTRIBUTION	8220 GOODWOOD BLVD., SUITE 2-B	BATON ROUGE GENERAL CONTRACTOR	LA 70806	21SEP77	PRIMARY OCTOBER 10 QUARTERLY	250
LANDRETH, BERTHA J. NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 77FEC/054/1614 #053578 CONTRIBUTION	3595 LINDEN AVE.	LONG BEACH SELF-EMPLOYED	CA 90807	18MAY77	PRIMARY JUNE MONTHLY	125





This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker  
General Counsel

79040064761



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

J.D. Nelson, Treasurer  
Democratic Finance Committee  
1625 Massachusetts Ave., N.W.  
Washington, D.C. 20036

Re: MUR 530

Dear Mr. Nelson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Democratic Finance Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your committee and your affiliate, the Democratic National Committee, accepted contributions in excess of the \$20,000.00 limitation of 2 U.S.C. §441a(a) (1)(B) from Mr. Nathan Landow in violation of 2 U.S.C. §441a(f). We have numbered this matter MUR 530.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Conley Edwards, Jr., staff member assigned to this matter, at 202-523-4143.



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202-523-4143.

This matter will remain confidential in accordance with 2 U.S.C. section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker  
General Counsel

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Nathan Landow  
7220 Arrowood Road  
Bethesda, Maryland 20034

Re: MUR 530

Dear Mr. Landow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").

Specifically, it appears that you violated 2 U.S.C. §441a(a)(3) by exceeding the annual \$25,000.00 contribution limitation for an individual. Also, reports filed with the Commission show that you contributed in excess of \$20,000.00 in 1977 to political committees established by a national political party (the Democratic National Committee and the Democratic Finance Committee) in violation of 2 U.S.C. §441a(a)(1)(B). We have numbered this matter MUR 530.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Conley Edwards, Jr., the staff member assigned to this matter, at



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FEDERAL ELECTION COMMISSION

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

FEBRUARY 2, 1978

D-16  
MUR 530  
Ref. O.G.C.

CRP  
2/14/78

MEMORANDUM

TO: ORLANDO B. POTTER

THROUGH: LOIS ZELLA *LZ*

FROM: IRENE ALLEN *IA*

SUBJECT: ONE POSSIBLE VIOLATION OF 2 U.S.C. §441a(a)(3) and §441a(a)(1)(B)

Attached is a revised schedule (Attachment 1) of contributions made by one individual to Federally registered political committees during the calendar year 1977. Please note that one column, labeled "Aggregate Year-To-Date for Democratic National Committees," aggregates the contributions made by the individual that fall under the limitations of §441a(a)(1)(B). The other column, labeled "Aggregate Year-To-Date for Individual," aggregates all contributions made by the individual that fall under the limitations of §441a(a)(3). The aggregate year-to-date total of contributions under the limitations of §441a(a)(1)(B) as of 6/21/77, the date of the last contribution reported, is \$19,750. The aggregate year-to-date total of contributions under the limitations of §441a(a)(3) as of 6/21/77, is \$24,750.

If you have any further questions on this matter, please do not hesitate to contact Carroll Bowen of the Party Team.



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FEDERAL ELECTION COMMISSION

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

January 31, 1978

MEMORANDUM

TO: WILLIAM OLDAKER, OGC

THROUGH: ORLANDO B. POTTER *OBP*  
LOIS ZELLA *L. Zella*

FROM: IRENE ALLEN *IA*

SUBJECT: ONE POSSIBLE VIOLATION OF 2 U.S.C. § 441a(a)(3)

As you know, 2 U.S.C. §441a(a)(3), states that:

No individual shall make contributions aggregating more than \$25,000 in any calendar year. For purposes of this paragraph, any contribution made to a candidate in a year other than the calendar year in which the election is held with respect to which such contribution is made, is considered to be made during the calendar year in which such election is held.

In the course of the review and the analysis of the reports of several political committees, this Division made note of one individual who appears to have exceeded the limit for total contributions, as cited above, during the calendar year, 1977.

Attached is an itemized breakdown of the contributions which were made by this individual. (Attachment 1) This is followed by copies of the reports in which these contributions were reported. (Attachment 2)

In your consideration of this matter, please note the following:

1. One of the contributions noted on the attachment was made to a candidate, and can be presumed to apply to the limitation for calendar year 1978. This contribution is included for information purposes only and is not included in the total contributions for calendar year 1977. (Attachment 3)
2. The review of contributions for this individual does not include those contributions which may have been made after 9/30/77. The January 31 Year End Reports, covering the period 10/1/77-12/31/77, have not yet been received by the Commission (with the exception of the Democratic Congressional Dinner Committee). Once the reports have been received, and a review made, your office will be notified of any additional contributions made by this individual

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3. One of the contributions noted on the attached pages is in the form of a loan endorsement. The committee which received the loan has made several loan repayments resulting in the reduction of the amount of the original endorsement and the releasement of the excessive amount. The releasements are noted on Attachment 1.
4. In addition, it appears that there may have been a violation of §441a(a)(1)(B), however, the excessive amount has subsequently been released by the committee.

We would appreciate your consideration of the matters set forth herein, and we recommend that you act in this matter as you deem necessary. If you have any questions, or if we may be of assistance to you, please do not hesitate to contact Carroll Bowen of the Party Team.

Attachments (3)

78040064767

NAME: NATHAN LANDOW

<u>DATE OF CONTRIBUTION</u>	<u>COMMITTEE NAME</u>	<u>AMOUNT OF CONTRIBUTION</u>	<u>AGGREGATE Y-T-D FOR DEMOCRATIC NAT'L CMTES* (441a(a)(1)(B))</u>	<u>AGGREGATE Y-T-D FOR INDIVIDUAL (441a(a)(3))</u>
1/27/77	DEMOCRATIC NATIONAL COMMITTEE*	\$20,000 (loan endorsement)	\$20,000	\$20,000
3/4/77	DEMOCRATIC NATIONAL COMMITTEE*	-5,000 (endorsement released)	\$15,000	\$15,000
3/31/77	DEMOCRATIC NATIONAL COMMITTEE*	-250 (endorsement released)	\$14,750	\$14,750
4/8/77	DEMOCRATIC FINANCE COMMITTEE*	\$5,000	\$19,750	\$19,750
4/12/77	DEMOCRATIC CONGRES- SIONAL DINNER COMMITTEE	\$5,000	N/A	\$24,750
6/13/77	DAVIS FOR CONGRESS COMMITTEE	500	N/A	N/A
6/16/77	DEMOCRATIC FINANCE COMMITTEE*	\$10,000	\$29,750	\$34,750
6/21/77	DEMOCRATIC NATIONAL COMMITTEE*	-10,000 (endorsement released)	\$19,750	\$24,750

\* The Democratic National Committee and the Democratic Finance Committee are affiliated National Committees with a shared limitation under §441a(a)(1)(B).

CONTRIBUTION INFORMATION:NAME: NATHAN LANDOW

ADDRESS: variously listed as-

7220 Arrowood Road  
Bethesda, Maryland  
20034

and

4710 Bethesda Avenue  
Bethesda, Maryland  
20014

OCCUPATION: variously listed as-

Builder - Property Management;  
Owner;  
Builder & Developer

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CONTRIBUTOR INFORMATION:

NAME: NATHAN LANDOW

PRINCIPAL PLACE OF BUSINESS:

Landow & Company  
Bethesda, Maryland  
20014  
(NO ENTRY)

30Day-MN

Form 4470  
Federal Election Commission  
2325 R Street, N.W.  
Washington, D.C. 20543

Instructions: Please Print Name, Address, and Telephone Number  
Candidates 11, 12, 17, 18, 19, 20 of 200 pages 3  
Over 200 pages fee \$10

Page 3 of 3  
Number of copies \_\_\_\_\_  
(\$1.00 per copy for each numbered card)

Name of Candidate or Committee as full

**Democratic National Committee**

Full Name, mailing address and ZIP code		Date Month, Day, Year	Amount of each receipt this period
Nathan Lerdow 7020 Arrowood Road Bethesda, Maryland 20834		1-27-77	20,000.00
Principal place of business Lerdow & Company Bethesda, Maryland	Occupation Building - Democratic Management <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income ..... P 3	3-4-77	(5,000.00)
			15,000.00
Full Name, mailing address and ZIP code Richard H. Millman 1720 H St., N.W. Washington, D.C. 20036		1-37-77	20,000.00
Principal place of business Millman & Greenberg Washington, D.C.	Occupation Advertising <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income ..... P 3		
Full Name, mailing address and ZIP code Paul H. Nathan 3145 West 75th St. Indianapolis, Ind. 46250		1-27-77	20,000.00
Principal place of business Colonial Crest Convalescent Center Indianapolis, Ind.	Occupation Owner <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income ..... P 3	3-4-77	(2500.00)
			17,500.00
Full Name, mailing address and ZIP code Noel McElroy 3432 1/2 Q St., N.W. Washington, D.C. 20009		1-27-77	20,000.00
Principal place of business Democratic National Committee Washington, D.C.	Occupation Volunteer <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income ..... P 3		
Full Name, mailing address and ZIP code		Date Month, Day, Year	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income ..... P 3		
Full Name, mailing address and ZIP code		Date Month, Day, Year	Amount of each receipt this period
Principal place of business	Occupation <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income ..... P 3		

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TD Day - WA

Schedule A  
July 1975  
Federal Election Commission  
225 K Street, N.W.  
Washington, D.C. 20543

Itemized Receipts,  
Contributions, Ticket Purchases, Loans,  
Rebates, and Transfers for Line  
Numbers 15, 16, 17 and/or 18 of FEC Form 3  
(See instructions on back)

Page 2 of 42 for  
LINE NUMBER 15  
(Use separate schedule for each numbered line)

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77030331014

Name of Candidate or Committee in full		Date (month, day, year)	Amount of each receipt this period
Democratic Finance Committee			
Full Name, mailing address and ZIP code Thurston D. Perry P.O. Box 419 Tuskegee, Al. 36083		4-11-77	1,000.00
Principal place of business Perry, Fuller, & Dirk Tuskegee, Al.	Occupation Attorney <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income \$ 1,000.00		
Full Name, mailing address and ZIP code Thomas C. Tolbert 3565 Summit Blvd. Pensacola, FL 32503		6-11-77	1,000.00
Principal place of business Edscomb, Cleveland, & Gaud Pensacola, FL.	Occupation CPA <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income \$ 1,000.00		
Full Name, mailing address and ZIP code Clayton E. Linkon, Jr. 8867 Burning Tree Rd. Pensacola, FL 32504		4-11-77	1,000.00
Principal place of business 8867 Burning Tree Rd. Pensacola, FL.	Occupation Physician <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income \$ 1,000.00		
Full Name, mailing address and ZIP code Mrs. Dorothy V. Bush 222 Harbour Dr. Naples, FL 33940		4-8-77 5-2-77	100.00 100.00
Principal place of business Democratic Nat'l Committee Washington, D.C.	Occupation Secretary <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income \$ 400.00		
Full Name, mailing address and ZIP code A.G. Gaston P.O. Box 697 Birmingham, Al. 35201		4-8-77	100.00
Principal place of business Smith & Gaston Birmingham, Al.	Occupation President <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income \$ 300.00		
Full Name, mailing address and ZIP code Nathan Lowlow 4716 Bethesda Ave. Bethesda, MD 20814		4-8-77	5,000.00
Principal place of business Lowlow & Co. Bethesda, Md.	Occupation Builder - Property Mgt. <input type="checkbox"/> Check if Contributor is self-employed Approximate Year Income \$ 5,000.00		

July 10

Schedule A

July 1976  
Federal Election Commission  
1100 K Street, N.W.  
Washington, D.C. 20543

Itemized Receipts,  
Contributions, Ticket Purchases, Loans,  
Gifts, and Transfers for Line  
Numbers 15, 16, 17 and/or 18 of FEC Form 3  
(See Instructions on back)

Page 2 of 2 for  
Linn election 1976  
(Use separate schedule(s) for each  
numbered line)

Name of Candidate or Committee in full

Democratic Congressional Dinner Committee

Full name, mailing address and ZIP code

M. Barron Hilton  
1050 Brookline Drive, Holby Hills, Los Angeles, CA

Date (month,  
day, year)

Amount of each  
receipt this period

Principal place of business

Hilton Hotels Corporation  
Beverly Hills, CA 90212

Occupation

President

Check if Contributor is self-employed  
Appropriate Year to date 4/4

4/4

1,000.00

Full name, mailing address and ZIP code

Robert M. Goshen  
9200 Rose Anna Place, Gaithersburg, Maryland 20760

Date (month,  
day, year)

Amount of each  
receipt this period

Principal place of business

Washington, D.C.

Occupation

U.S. Government

Check if Contributor is self-employed  
Appropriate Year to date 4/12/

4/12/

500.00

Full name, mailing address and ZIP code

Walter S. Sunnell  
4633 North 38th Street, Arlington, Virginia 22207

Date (month,  
day, year)

Amount of each  
receipt this period

Principal place of business

Sunnell & Bennett Coral Eleventh  
Vienna, Virginia 22180

Occupation

Vice-President

Check if Contributor is self-employed  
Appropriate Year to date 4/12

4/12

500.00

Full name, mailing address and ZIP code

Nathan Lomas  
7233 Arched Road, Catonsville, Maryland 20834

Date (month,  
day, year)

Amount of each  
receipt this period

Principal place of business

Lomas & Company  
Catonsville, Maryland 20834

Occupation

Owner

Check if Contributor is self-employed  
Appropriate Year to date 4/12

4/12

5,000.00

Full name, mailing address and ZIP code

Mary R. Latona  
1404 Hillstone Drive, Silver Spring, Maryland 20904

Date (month,  
day, year)

Amount of each  
receipt this period

Principal place of business

Mt. Rainier Pharmacy  
Mt. Rainier, MD 20822

Occupation

Owner

Check if Contributor is self-employed  
Appropriate Year to date 4/12/

4/12/

500.00

Full name, mailing address and ZIP code

James H. Scott  
15525 Montgomery Road, Beltsville, Maryland 20705

Date (month,  
day, year)

Amount of each  
receipt this period

Principal place of business

Scott Printing & Connection  
Beltsville, MD

Occupation

Owner-Printer

Check if Contributor is self-employed  
Appropriate Year to date 4/12

4/12

500.00

73040064772





July 10

Rule A  
is  
Election Commission  
Street, R.M.  
Wm, D.C. 20453

**Standard Receipts,  
Contributions, Ticket Purchases, Loans,  
Rebates, and Transfers for Line  
Numbers 15, 16, 17 and/or 18 of FEC Form 3**  
(See instructions on back)

Page 2 of 7 in  
Last number 16  
(Use separate schedule for each numbered line)

Name of Candidate or Committee in full

**DEMOCRATIC NATIONAL COMMITTEE**

Full Name, mailing address and ZIP code	Occupation	Date (month, day, year)	Amount of each receipt this period
Harry E. Gould, Jr. 145 E. 32nd St. New York, New York 10016	President	1-27-77 3-31-77	20,000.00 (250.00)
Principal place of business Gould Paper Co. New York, New York	<input type="checkbox"/> Check if Contributor is self-employed Approximate Year in date . . . . . 2-8		19,750.00
Patrick J. O'Connor 30th Floor, IDS Tower Minneapolis, Minn 55402	Attorney	1-27-77 3-31-77	20,000.00 (250.00)
Principal place of business O'Connor and Hannan Minneapolis, Minn.	<input type="checkbox"/> Check if Contributor is self-employed Approximate Year in date . . . . . 2-8		19,750.00
Ira S. Hotchkiss 400 North Park Road Hollywood, Florida 33021	President	1-27-77 3-4-77 3-31-77	20,000.00 (5,000.00) (250.00)
Principal place of business Hotchkiss Enterprises Hollywood, Florida	<input type="checkbox"/> Check if Contributor is self-employed Approximate Year in date . . . . . 2-5		14,750.00
DoJough Franklin 2400 1st National Bank Tower Atlanta, Georgia 30303	Attorney	1-27-77	20,000.00
Principal place of business 2400 First National Bank Tower Atlanta, Georgia	<input type="checkbox"/> Check if Contributor is self-employed Approximate Year in date . . . . . 2-5		
Nathan Landow 7220 Arrowood Road Bethesda, Md. 20824	Builder-Property Management	1-27-77 3-4-77 3-31-77	20,000.00 (5,000.00) (250.00)
Principal place of business Landow & Company Bethesda, Md.	<input type="checkbox"/> Check if Contributor is self-employed Approximate Year in date . . . . . 2-5	6-21-77	14,750.00 (10,000.00) (250.00)
Richard M. Millman 1730 M Street, N.W. Washington, D.C. 20036	Attorney	1-27-77 3-31-77	20,000.00 (250.00)
Principal place of business Millman & Greenburg Washington, D.C.	<input type="checkbox"/> Check if Contributor is self-employed Approximate Year in date . . . . . 2-5		19,750.00

7 9 0 4 0 0 6 4 7 7 5

Subtotal of receipts this page (optional) . . . . . 5  
Total this period (this page this line number only) . . . . . 6

Statement of a Candidate for Nomination or Election to Federal Office

"Candidate" as defined by 2 USC 431 (b)(1) (See reverse side for instructions)

Committees authorized to receive contributions and make expenditures in connection with this election must maintain separate records with respect to each election.

1 Name of Candidate: Meniel Jackson Davis; 2 Identification Number (Commission use only): NA; 3 Party Affiliation: Democrat; 4 Office Sought: U. S. House of Representatives; 5 District and State of Candidate: 1st, South Carolina - 02

Designation of Principal Campaign Committee

I hereby designate the following named political committee as my Principal Campaign Committee for the year of election 1978. Note: The principal campaign committee must be designated on FEC Form 1.

(a) Name of Committee (in full): Davis for Congress Committee; (b) Address (number and street): P. O. Box 10207; (c) City, State and ZIP code: Charleston, S. C. 29411

I hereby designate the following national and or State bank(s) as campaign bank(s) for use by myself and the above named committee.

(a) Name of Bank (in full): S. C. National Bank; (b) Address (number and street): 16 Broad Street; (c) City, State and ZIP code: Charleston, S. C. 29401

Candidate Reporting Status

8 Check Reporting Status (a) or (b) whichever is applicable. (a) I hereby certify that the above named committee and authorized agents thereof will receive and disclose all funds in support of my candidacy in this election... (b) I intend to personally receive contributions and/or make expenditures in support of my candidacy and I will file the reports...

I certify that I have examined this Statement and, to the best of my knowledge and belief, it is true, correct and complete. Signature of Candidate: [Signature] Date: May 12, 1977

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. 1457 or 1441. (see reverse side of form)

For further information contact: Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20543

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 530



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