



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20461

THIS IS THE END OF TAP # 702

Date Filmed 1/12/79 Camera No. --- 2

Cameraman GPC



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

December 1, 1978

David G. Crocker, Esquire  
Early, Starbuck & Lennon  
900 Industrial State Bank  
Building  
Kalamazoo, Michigan 49007

Re: MUR 702(78)

Dear Mr. Crocker:

After considering the circumstances of this matter, the Commission has determined to take no further action against you and close its file in this matter.

In taking this action, the Commission reminds you that a corporate contribution in connection with a Federal election is a violation of 2 U.S.C. §441b and that civil penalties may be assessed in such matters. In August, 1978, the Commission determined that even if such contributions are refunded, civil penalties would be assessed against violators after that date.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4075.

Sincerely,

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

William C. Oldaker  
General Counsel



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

December 1, 1978

Arthur F. Barkey, Esquire  
Costello & Barkey, P.C.  
18481 West Ten Mile Road  
Southfield, Michigan 48075

Re: MUR 702(78)

Dear Mr. Barkey:

After considering the circumstances of this matter, the Commission has determined to take no further action against you and close its file in this matter.

In taking this action, the Commission reminds you that your contribution was nevertheless in violation of 2 U.S.C. §441b and that civil penalties may be assessed in such matters. In August, 1978, the Commission determined that even if such contributions are refunded, civil penalties would be assessed against violators after that date.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4075.

Sincerely,

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

William C. Oldaker  
General Counsel

70010384071



FEDERAL ELECTION COMMISSION

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

December 1, 1978

Mr. Jack A. Winters, President  
Clairmont Transfer Company  
P.O. Box 717  
Escanaba, Michigan 49829

Re: MUR 702(78)

Dear Mr. Winters:

After considering the circumstances of this matter, the Commission has determined to take no further action against you and close its file in this matter.

In taking this action, the Commission reminds you that a corporate contribution in connection with a Federal election is a violation of 2 U.S.C. §441b and that civil penalties may be assessed in such matters. In August, 1978, the Commission determined that even if such contributions are refunded, civil penalties would be assessed against violators after that date.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4075.

Sincerely,

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

William C. Oldaker  
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
The Michigan Republican ) MUR 702  
State Finance Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 29, 1978, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated November 22, 1978, regarding the above-captioned matter:

1. Take no further action against the Sexton Dairy Company, the Borgess Hospital, or the Clairmont Transfer Company in connection with contributions to the Michigan Republican State Finance Committee.
2. Send the letters attached to the above-named report.
3. Close the file.

Voting for this determination were Commissioners Springer, Aikens, Tiernan, McGarry, and Harris.

Attest:

11/29/78

Date

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

Report signed by the General Counsel:	11-24-78
Received in Office of Commission Secretary:	11-27-78, 11:38
Circulated on 48 hour vote basis:	11-27-78, 3:00

7 2 0 4 0 3 1 0 8 1

November 27, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 702

Please have the attached General Counsel's Report on MUR 702 distributed to the Commission on a 48 hour tally basis.

Thank you.

79040084082

RECEIVED  
OFFICE OF THE  
COMMISSIONER

BEFORE THE FEDERAL ELECTION COMMISSION  
November 22, 1978

78 NOV 27 All: 3

In the Matter of )  
 ) MUR 702  
The Michigan Republican )  
State Finance Committee )

GENERAL COUNSEL'S REPORT

ALLEGATIONS

A review of the July 10, 1977, and 1977 year end report filed by the Michigan Republican State Finance Committee ("the Committee") revealed that three corporations contributed to the Committee in violation of 2 U.S.C. §441b(a).

EVIDENCE

The Committee refunded the corporate contribution after the Commission's reason to believe notification was sent in June, 1978. On September 27, 1978, the Commission found reason to believe that the three corporations violated 2 U.S.C. §441b(a). The corporations were notified of the Commission's determination in letters dated October 2, 1978. The following responses were received:

(1) Sexton Dairy Company

The Committee's July 10, 1977, report revealed a \$130.00 contribution from the Sexton Dairy Company on April 9, 1977. The Sexton Dairy Company's counsel responded in a letter dated November 1, 1978 (Attachment I) and stated that the Company President's secretary erroneously wrote the check on the corporate account instead of the President's personal bank account. He

further stated that once the Committee refunded the contribution, on July 11, 1978, the President mailed the Committee his personal check for the same amount which was his original intent. After a review of the Committee's report revealed no such replacement contribution, the counsel was contacted to verify the information. He responded in a letter (Attachment II) that there actually was no such replacement contribution although the corporate contribution was refunded.

(2) Borgess Hospital

The Committee's 1977 year-end report revealed a \$300.00 contribution from the Borgess Hospital on October 11, 1977. The Borgess Hospital responded in a letter dated October 16, 1978 (Attachment III) and stated that the check was issued payable to the Gerald R. Ford Tribute. The individuals questioned about the purpose of the tribute recalled that it was for recognition of the public services performed by the former President.

(3) Clairmont Transfer Company

The Committee's July 10, 1977, report revealed a \$130 contribution from the Clairmont Transfer Company on May 25, 1977. The Clairmont Transfer Company responded in a letter dated October 9, 1978, (Attachment IV) that the \$130 check was made payable to "Bill's Birthday Beef Steak" and mailed to the Michigan Trucking Association. There was no indication by the Michigan Trucking Association that the dinner ticket was a political contribution. A representative at the Michigan Trucking Association stated that the event was in honor of the Governor's

birthday; however they did not sponsor the dinner.

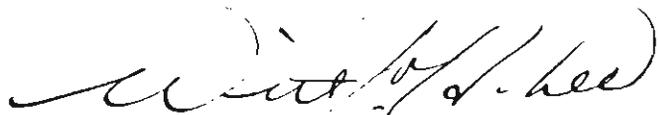
LEGAL ANALYSIS

2 U.S.C. 441b(a) states that it is unlawful for any corporation to make a contribution in connection with any Federal election. Due to the fact that these 1978 contributions were refunded by the Committee after Commission notification, and that it is unclear whether the contributions from the Clairmont Transfer Company and the Borgess Hospital were intended in connection with Federal elections; we think no further action should be taken in this matter.

RECOMMENDATION

Take no further action against the Sexton Dairy Company, the Borgess Hospital, or the Clairmont Transfer Company in connection with contributions to the Michigan Republican State Finance Committee. Send attached letters. Close the file.

11/24/78  
Date

  
William C. Oldaker  
General Counsel

ATTACHMENTS

1. Response from Sexton Dairy Company
2. Response from Sexton Dairy Company
3. Response from Borgess Hospital
4. Response from Clairmont Transfer Company
5. Proposed letter to Sexton Dairy Company
6. Proposed letter to Borgess Hospital
7. Proposed letter to Clairmont Transfer Company

LAW OFFICES OF  
COSTELLO & BARKEY, P. C.  
18481 WEST TEN MILE ROAD  
SOUTHFIELD, MICHIGAN 48075

FEDERAL ELECTION COMMISSION  
DONALDSON

ARTHUR F. BARKEY

(313) 557-5227

NOV 1978

BERNARD D. COSTELLO (1908-1970)  
ARTHUR F. BARKEY (1929-1965)

November 1, 1978

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

807609

Attention: Mr. William C. Oldaker  
General Counsel

Re: Your reference No. MUR 702

Dear Sir:

I enclose for reference purposes a copy of your October 2, 1978 letter addressed as follows:

President  
Sexton Dairy Company  
25820 Southfield Road  
Southfield, Michigan 48075

Your letter requested a response within ten days after receipt. However, the letter was erroneously sent to the former office of Sexton Dairy Company thereby causing a delay in this response.

It appears from your letter that a \$130 contribution was made by corporate check on or about April 19, 1977 to the Michigan Republican State Finance Committee. The Finance Committee returned the contribution by its check dated July 11, 1978. You claim that there has been a violation of 2 USC §441(b)(a) which prohibits contributions by corporations.

My preliminary investigation discloses the following. The President of Sexton Dairy Company asked his secretary to write a check for \$130. Such checks were and are written on his personal bank account. However, the secretary erroneously drew it on the corporate account, an error which the President did not catch. Apparently the error was also not caught by the Finance Committee because it deposited the check. Following the return of the refund check the President then mailed his personal check for the same amount, thereby accomplishing his intent in the first place. If there has been a violation of the Act, it was clearly neither willful nor intentional. It was purely a human error.

Your October 2, 1978 letter to Sexton Dairy Company did not indicate what action your office intends to take. I would appreciate your comments so that I can give whatever additional response you feel is called for.

Yours very truly,  
*Arthur F. Barkey*  
ARTHUR F. BARKEY

AFB:sab  
Enclosure

LAW OFFICES OF  
COSTELLO & BARKEY, P. C.  
18481 WEST TEN MILE ROAD  
SOUTHFIELD, MICHIGAN 48075

ARTHUR F. BARKEY

(313) 557-5227

BERNARD P. COSTELLO (1888-1970)  
ARTHUR F. BARKEY (1889-1965)  
73 NOV 25 PM 10:35

November 17, 1978

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

Attention: Ms. Susan Donaldson  
Office of General Counsel

Re: Your reference No. MUR 702

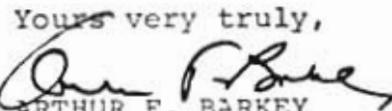
Dear Ms. Donaldson:

This confirms our telephone conversation of November 16, 1978.

You requested information as to the reissuance of a \$130 check drawn upon the personal account of the president of Sexton Dairy Company.

I have just been informed that there was no specific check for \$130 drawn and delivered subsequently to the refund made by the Michigan Republican State Finance Committee on July 11, 1978. Other contribution checks have been drawn on his personal account but none was intended to replace specifically the \$130 check.

If there is anything further that you would like to have, please feel free to contact me.

Yours very truly,  
  
ARTHUR F. BARKEY

AFB:sab

807907

1031037

EARLY, STARBUCK & LENNON  
ATTORNEYS AT LAW  
800 INDUSTRIAL STATE BANK BUILDING  
KALAMAZOO, MICHIGAN 49007

VINCENT T. EARLY  
CHARLES E. STARBUCK  
GEORGE H. LENNON  
JOHN T. PETERS, JR.  
ROBERT B. LENNON  
DAVID B. CHOCKER  
J. RICHARDSON JOHNSON  
RANDOLPH E. FISCHER, JR.  
JAMES L. BECK

October 16, 1978

73 OCT 18 1978

TELEPHONE (616) 349-0705

807014

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

Re: HUR 702

Dear Ms. Donaldson:

We are attorneys for Borgess Hospital, 1521 Gull Road, Kalamazoo, Michigan 49001, and as such have been requested to investigate the allegations contained in a letter dated October 2, 1978, directed to our client and signed by William C. Oldaker, General Counsel for the Commission.

Pursuant to our client's instructions and within the limited time allowed we have made an investigation and find as follows:

1. That on September 21, 1977, a Request for Check was submitted to the finance department of the Hospital describing as its purpose the purchase of six tickets to the Gerald R. Ford Tribute with the check to be payable to the Gerald R. Ford Tribute.
2. That on September 21, 1977, check number 66149 in the amount of \$300.00 was issued payable to the Gerald R. Ford Tribute.
3. That the check numbered 66149 was endorsed "Jerry Ford Tribute".
4. That no literature describing the purpose of the Gerald R. Ford Tribute could be located at the Hospital and the individuals questioned could not remember the purpose of the tribute other than as a recognition of the public services performed by the former President.
5. That on or about July 11, 1968, a check was received in the amount of \$300.00 from the Republican State Finance Committee, General Account, with the notation on the voucher "Account 600 returning corporate check money".

Donaldson 5160  
ATTACHMENT IV  
RECEIVED  
FEDERAL ELECTION  
COMMISSION



P. O. Box 717, 1803 Seventh Avenue North  
ESCANABA, MICHIGAN 49829

'78 OCT 13 PM 2:01

October 9, 1978

003015

1001031030

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

Re: MUR 702

Dear Mr. Oldaker:

In response to your October 2, 1978 letter advising us of a possible violation of the Federal Election Campaign Act of 1971, I wish to offer the following explanation.

The \$130 payment referred to was not made to the Michigan Republican State Finance Committee, but rather, the check was made payable to "Bill's Birthday Beef Steak" and mailed to the Michigan Trucking Association in Lansing. The request to purchase a dinner ticket was made by the Michigan Trucking Association and there was no indication by them that this was in fact a political contribution. We felt that this was an Association sponsored event and the implication of a political contribution just was not present.

Mr. Oldaker, we at Clairmont Transfer are fully aware of the seriousness involved in political contributions by corporations, and we have a very strict company policy prohibiting this type of activity. In the incident referred to, I am of the opinion that we may have been derelict in not identifying the MTA's request as a political contribution, but I can assure you that it is not our intention to circumvent the law.

Should you require any additional information, you may be assured of the full cooperation of this office.

Very truly yours,

CLAIRMONT TRANSFER CO.

*Jack A. Winters*  
Jack A. Winters  
President

JAW:mcp



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

Arthur F. Barkey, Esquire  
Costello & Barkey, P.C.  
18481 West Ten Mile Road  
Southfield, Michigan 48075

Re: MUR 702(78)

Dear Mr. Barkey:

After considering the circumstances of this matter, the Commission has determined to take no further action against you and close its file in this matter.

In taking this action, the Commission reminds you that your contribution was nevertheless in violation of 2 U.S.C. §441b and that civil penalties may be assessed in such matters. In August, 1978, the Commission determined that even if such contributions are refunded, civil penalties would be assessed against violators after that date.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4075.

Sincerely,

William C. Oldaker  
General Counsel

7371081001



FEDERAL ELECTION COMMISSION

1155 K STREET N.W.  
WASHINGTON, D.C. 20463

David G. Crocker, Esquire  
Early, Starbuck & Lennon  
900 Industrial State Bank  
Building  
Kalamazoo, Michigan 49007

Re: MUR 702(78)

Dear Mr. Crocker:

After considering the circumstances of this matter, the Commission has determined to take no further action against you and close its file in this matter.

In taking this action, the Commission reminds you that a corporate contribution in connection with a Federal election is a violation of 2 U.S.C. §441b and that civil penalties may be assessed in such matters. In August, 1978, the Commission determined that even if such contributions are refunded, civil penalties would be assessed against violators after that date.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4075.

Sincerely,

William C. Oldaker  
General Counsel

79710081001



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

Mr. Jack A. Winters, President  
Clairmont Transfer Company  
P.O. Box 717  
Escanaba, Michigan 49829

Re: MUR 702(78)

Dear Mr. Winters:

After considering the circumstances of this matter, the Commission has determined to take no further action against you and close its file in this matter.

In taking this action, the Commission reminds you that a corporate contribution in connection with a Federal election is a violation of 2 U.S.C. §441b and that civil penalties may be assessed in such matters. In August, 1978, the Commission determined that even if such contributions are refunded, civil penalties would be assessed against violators after that date.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at (202) 523-4075.

Sincerely,

William C. Oldaker  
General Counsel

7901073100

6, 2nd  
5636

LAW OFFICES OF  
**COSTELLO & BARKEY, P. C.**  
18481 WEST TEN MILE ROAD  
SOUTHFIELD, MICHIGAN 48075

ARTHUR F. BARKEY

(313) 557-5227

78 NOV 20

BERNARD R. COSTELLO (1888-1970)  
ARTHUR F. BARKEY (1889-1965)

November 17, 1978

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

Attention: Ms. Susan Donaldson  
Office of General Counsel

Re: Your reference No. MUR 702

Dear Ms. Donaldson:

This confirms our telephone conversation of November 16, 1978.

You requested information as to the reissuance of a \$130 check drawn upon the personal account of the president of Sexton Dairy Company.

I have just been informed that there was no specific check for \$130 drawn and delivered subsequently to the refund made by the Michigan Republican State Finance Committee on July 11, 1978. Other contribution checks have been drawn on his personal account but none was intended to replace specifically the \$130 check.

If there is anything further that you would like to have, please feel free to contact me.

Yours very truly,

  
ARTHUR F. BARKEY

AFB:sab

807967

LAW OFFICES OF  
**COSTELLO & BARKEY, P. C.**

18481 WEST TEN MILE ROAD  
SOUTHFIELD, MICHIGAN 48075



1973

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

Attention: Ms. Susan Donaldson  
Office of General Counsel

00331111

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LAW OFFICES OF  
**COSTELLO & BARKEY, P. C.**  
18481 WEST TEN MILE ROAD  
SOUTHFIELD, MICHIGAN 48075

ARTHUR F. BARKEY

(313) 557-5227

178 NOV

BERNARD J. COSTELLO (1888-1970)  
JAMES J. BARKEY (1889-1965)

November 1, 1978

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

807609

Attention: Mr. William C. Oldaker  
General Counsel

Re: Your reference No. MUR 702

Dear Sir:

I enclose for reference purposes a copy of your October 2, 1978 letter addressed as follows:

President  
Sexton Dairy Company  
25820 Southfield Road  
Southfield, Michigan 48075

Your letter requested a response within ten days after receipt. However, the letter was erroneously sent to the former office of Sexton Dairy Company thereby causing a delay in this response.

It appears from your letter that a \$130 contribution was made by corporate check on or about April 19, 1977 to the Michigan Republican State Finance Committee. The Finance Committee returned the contribution by its check dated July 11, 1978. You claim that there has been a violation of 2 USC §441(b)(a) which prohibits contributions by corporations.

My preliminary investigation discloses the following. The President of Sexton Dairy Company asked his secretary to write a check for \$130. Such checks were and are written on his personal bank account. However, the secretary erroneously drew it on the corporate account, an error which the President did not catch. Apparently the error was also not caught by the Finance Committee because it deposited the check. Following the return of the refund check the President then mailed his personal check for the same amount, thereby accomplishing his intent in the first place. If there has been a violation of the Act, it was clearly neither willful nor intentional. It was purely a human error.

Your October 2, 1978 letter to Sexton Dairy Company did not indicate what action your office intends to take. I would appreciate your comments so that I can give whatever additional response you feel is called for.

Yours very truly,  
*Arthur F. Barkey*  
ARTHUR F. BARKEY

AFB:sab  
Enclosure



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

October 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

President  
Sexton Dairy Company  
25820 Southfield Road  
Southfield, Michigan 48075

Re: MUR 702

Dear Sir or Madame:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation violated 2 U.S.C. §441b(a) by making a contribution of \$130 on or about April 9, 1977, to the Michigan Republican State Finance Committee. Although we note that the Committee returned this contribution to you by check dated July 11, 1978, the Act was violated when the contribution was originally made. We have numbered this matter MUR 702.

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.

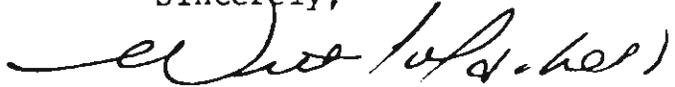
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

This matter will remain confidential in accordance with 2 U.S.C. §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

2004031000

LAW OFFICES OF  
**COSTELLO & BARKEY, P. C.**  
18481 WEST TEN MILE ROAD  
SOUTHFIELD, MICHIGAN 48075



120 3 11 12 5

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

Attention: Mr. William C. Oldaker  
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.  
WASHINGTON, D.C. 20461

MEMORANDUM TO CHARLES STEELE  
FROM: MARJORIE W. EMMONS *mwe*  
DATE: OCTOBER 25, 1978  
SUBJECT: MUR 702 - Interim Report dated 10-18-78  
Received in OCS: 10-24-78,  
10:10

The above-named document was circulated on a 24 hour no-objection basis at 12:00, October 24, 1978.

The Commission Secretary's Office has received no objections to the Interim Report as of 12:00 this date.

70010784079

October 24, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Eliasa T. Garr  
SUBJECT: MUR 702

Please have the attached Interim Report on MUR 702 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

9040084100

October 24, 1978

MEMORANDUM TO: Marge Emmons  
FROM: Elissa T. Garr  
SUBJECT: MUR 702

Please have the attached Interim Report on MUR 702 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

9040084100

RECEIVED  
OFFICE OF THE

BEFORE THE FEDERAL ELECTION COMMISSION  
October 18, 1978

78 OCT 24 A10: 10

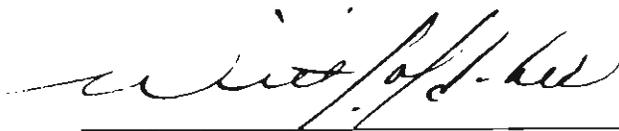
In the Matter of )  
 )  
The Michigan Republican ) MUR 702  
State Finance Committee )

INTERIM REPORT

The allegations in MUR 702 are that three corporations violated 2 U.S.C. §441b(a) in connection with contributions to the Michigan Republican State Finance Committee. The reason to believe notification letters were mailed on October 2, 1978. As of this date, we have received a response from only one Respondent. We expect to receive the other responses shortly and will report to the Commission after our review of same.

1093101

10/23/78  
Date

  
\_\_\_\_\_  
William C. Oldaker  
General Counsel

Good  
5007

EARLY, STARBUCK & LENNON  
ATTORNEYS AT LAW  
900 INDUSTRIAL STATE BANK BUILDING  
KALAMAZOO, MICHIGAN 49007

VINCENT T. EARLY  
CHARLES E. STARBUCK  
GEORGE H. LENNON  
JOHN T. PETERS, JR.  
ROBERT R. LENNON  
DAVID G. CROCKER  
RICHARDSON JOHNSON  
HAROLD E. FISCHER, JR.  
JAMES E. BECK

October 16, 1978

18 OCT 1978 9:45

TELEPHONE (616) 349-8765

807014

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

Re: MUR 702

Dear Ms. Donaldson:

We are attorneys for Borgess Hospital, 1521 Gull Road, Kalamazoo, Michigan 49001, and as such have been requested to investigate the allegations contained in a letter dated October 2, 1978, directed to our client and signed by William C. Oldaker, General Counsel for the Commission.

Pursuant to our client's instructions and within the limited time allowed we have made an investigation and find as follows:

1. That on September 21, 1977, a Request for Check was submitted to the finance department of the Hospital describing as its purpose the purchase of six tickets to the Gerald R. Ford Tribute with the check to be payable to the Gerald R. Ford Tribute.
2. That on September 21, 1977, check number 66149 in the amount of \$300.00 was issued payable to the Gerald R. Ford Tribute.
3. That the check numbered 66149 was endorsed "Jerry Ford Tribute".
4. That no literature describing the purpose of the Gerald R. Ford Tribute could be located at the Hospital and the individuals questioned could not remember the purpose of the tribute other than as a recognition of the public services performed by the former President.
5. That on or about July 11, 1968, a check was received in the amount of \$300.00 from the Republican State Finance Committee, General Account, with the notation on the voucher "Account 600 returning corporate check money".



ARLY, STARBUCK & LENNON

ATTORNEYS AT LAW  
300 INDUSTRIAL STATE BANK BUILDING  
SALAMANCA MICHIGAN 49007



Ms. Susan Donaldson  
Federal Election Commission  
1325 K Street NW  
Washington, D.C. 20463

600\* 5160



**TRANSFER CO.**

P. O. Box 717, 1803 Seventh Avenue North  
ESCANABA, MICHIGAN 49829

FEDERAL ELECTION COMMISSION

OCT 10 PM 2:01

October 9, 1978

000015

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

Re: MUR 702

Dear Mr. Oldaker:

In response to your October 2, 1978 letter advising us of a possible violation of the Federal Election Campaign Act of 1971, I wish to offer the following explanation.

The \$130 payment referred to was not made to the Michigan Republican State Finance Committee, but rather, the check was made payable to "Bill's Birthday Beef Steak" and mailed to the Michigan Trucking Association in Lansing. The request to purchase a dinner ticket was made by the Michigan Trucking Association and there was no indication by them that this was in fact a political contribution. We felt that this was an Association sponsored event and the implication of a political contribution just was not present.

Mr. Oldaker, we at Clairmont Transfer are fully aware of the seriousness involved in political contributions by corporations, and we have a very strict company policy prohibiting this type of activity. In the incident referred to, I am of the opinion that we may have been derelict in not identifying the MTA's request as a political contribution, but I can assure you that it is not our intention to circumvent the law.

Should you require any additional information, you may be assured of the full cooperation of this office.

Very truly yours,

CLAIRMONT TRANSFER CO.

*Jack A. Winters*  
Jack A. Winters  
President

JAW:mcp

**TRANSFER CO.**

P. O. Box 717 - Escanaba Michigan 49829

OCT 13 PM 2:01



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

FEDERAL ELECTION COMMISSION

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



REGISTERED  
Uncollected  
Addressed  
No such street  
No such office in state  
Do not stamp in this envelope

POSTAGE AND FEES PAID



President  
Sexton Dairy Company  
25820 Southfield Road  
Southfield, Michigan 48075

*Addressed Return*

*5011*

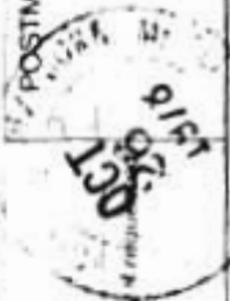
CERTIFIED

*943464*

70010781107

791, 113110

McWason - MUR '102

● <b>SENDER</b> Complete items 1, 2, and 3 Add your address in the RETURN TO space on reverse	
<b>1</b> The following service is requested (check one) <input checked="" type="checkbox"/> Show to whom and date delivered _____ c <input type="checkbox"/> Show to whom, date, and address of delivery _____ c <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered _____ c <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery _____ c (CONSULT POSTMASTER FOR FEES) *	<b>2</b> ARTICLE ADDRESSED TO Sexton Dairy Co 2228 Vanborn Rd Dearborn Heights, Mich
<b>3</b> ARTICLE DESCRIPTION REGISTERED NO _____ CERTIFIED NO _____ INSURED NO _____ 943744 (Always obtain signature of addressee or agent)	I have received the article described above <b>SIGNATURE</b> _____ <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent DATE OF DELIVERY _____
<b>5</b> ADDRESS: Complete only if required POSTMARK 	<b>6</b> UNABLE TO DELIVER BECAUSE _____ CLERK'S INITIALS _____



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

October 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

President  
Borgess Hospital, Inc.  
Kalamazoo, Michigan 49001

Re: MUR 702

Dear Sir or Madame:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation violated 2 U.S.C. §441b(a) by making a contribution of \$300 on or about October 11, 1977, to the Michigan Republican State Finance Committee. Although we note that the Committee returned this contribution to you by check dated July 11, 1978, the Act was violated when the contribution was originally made. We have numbered this matter MUR 702.

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 Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

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This matter will remain confidential in accordance with 2 U.S.C. §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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*MUK 702-Donaldson*

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 ..... 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  
*Burgess Hospital, Inc.  
 Kalamazoo, Michigan*

3 ARTICLE DESCRIPTION  
 REGISTERED NO. CERTIFIED NO. INSURED NO.  
*49001*  
*943166*

(Always obtain signature of addressee or agent)

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

4 *Burgess Hosp* *WCO*  
 DATE OF DELIVERY POSTMARK

5 ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE. CLERK'S INITIALS

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

President  
Borgess Hospital, Inc.  
Kalamazoo, Michigan 49001

Re: MUR 702

Dear Sir or Madame:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation violated 2 U.S.C. §441b(a) by making a contribution of \$300 on or about October 11, 1977, to the Michigan Republican State Finance Committee. Although we note that the Committee returned this contribution to you by check dated July 11, 1978, the Act was violated when the contribution was originally made. We have numbered this matter MUR 702.

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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 Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

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9/29

7904008411

This matter will remain confidential in accordance with 2 U.S.C. §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

79040084112



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

October 2, 1978

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

President  
Sexton Dairy Company  
25820 Southfield Road  
Southfield, Michigan 48075

Re: MUR 702

Dear Sir or Madame:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation violated 2 U.S.C. §441b(a) by making a contribution of \$130 on or about April 9, 1977, to the Michigan Republican State Finance Committee. Although we note that the Committee returned this contribution to you by check dated July 11, 1978, the Act was violated when the contribution was originally made. We have numbered this matter MUR 702.

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 Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

70010084113

This matter will remain confidential in accordance with 2 U.S.C. §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

79040084114

MUR 702 - Donaldson

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 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 \$ C
- CONSULT POSTMASTER FOR FEES

2 ARTICLE ADDRESSED TO

Sexton Dairy Company  
25820 Southfield Road  
Southfield, Michigan

3 ARTICLE DESCRIPTION

REGISTERED NO CERTIFIED NO INSURED NO

943464

(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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

President  
Sexton Dairy Company  
25820 Southfield Road  
Southfield, Michigan 48075

Re: MUR 702

Dear Sir or Madame:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation violated 2 U.S.C. §441b(a) by making a contribution of \$130 on or about April 9, 1977, to the Michigan Republican State Finance Committee. Although we note that the Committee returned this contribution to you by check dated July 11, 1978, the Act was violated when the contribution was originally made. We have numbered this matter MUR 702.

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 Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

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7904008415

This matter will remain confidential in accordance with 2 U.S.C. §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

79040084116



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

President  
Clairmont Transfer Company  
1803 7th Avenue N.  
Escanaba, Michigan 49829

Re: MUR 702

Dear Sir or Madame:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation violated 2 U.S.C. §441b(a) by making a contribution of \$130 on or about May 25, 1977, to the Michigan Republican State Finance Committee. Although we note that the Committee returned this contribution to you by check dated July 11, 1978, the Act was violated when the contribution was originally made. We have numbered this matter MUR 702.

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 Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

77940384117

This matter will remain confidential in accordance with 2 U.S.C. §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*  
William C. Oldaker  
General Counsel

*MUR 702 - Donaldson*

PS Form 3811, Apr. 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

7 0 0 1 0 7 8 4 1 1 3

● 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:  
*Clairmont Transfer Co.  
1503 7th Avenue N.  
Escanaba, Michigan 49829*

3. ARTICLE DESCRIPTION:  
REGISTERED NO. | CERTIFIED NO. | INSURED NO.  
*943470*

(Always obtain signature of addressee or agent)

I have received the article described above.  
SIGNATURE  Addressee  Authorized agent  
*A. C. Pintok*

4. DATE OF DELIVERY | POSTMARK  
*087 - 5 1978*

5. ADDRESS (Complete only if requested)

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

President  
Clairmont Transfer Company  
1803 7th Avenue N.  
Escanaba, Michigan 49829

Re: MUR 702

Dear Sir or Madame:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation violated 2 U.S.C. §441b(a) by making a contribution of \$130 on or about May 25, 1977, to the Michigan Republican State Finance Committee. Although we note that the Committee returned this contribution to you by check dated July 11, 1978, the Act was violated when the contribution was originally made. We have numbered this matter MUR 702.

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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 Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

8/9/29

79040084119

This matter will remain confidential in accordance with 2 U.S.C. §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

79040084120

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
Michigan Republican ) MUR 702 (78)  
State Finance Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 28, 1978, the Commission determined by a vote of 4 - 0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Take no further action against the Michigan Republican State Finance Committee. Send letters attached to the General Counsel's Report dated September 18, 1978.
2. Find reason to believe that the Sexton Dairy Company, the Clairmont Transfer Co., and the Borgess Hospital violated 2 U.S.C. §441b(a) by contributing to the Michigan Republican State Finance Committee. Send letters attached to the General Counsel's Report dated September 18, 1978.

Voting for this determination were Commissioners Springer, Tiernan, Thomson, and Harris.

Attest:

9/29/79  
Date

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

Report Date: 9-18-79 Signed: 9-25-78  
Received in Office of Commission Secretary: 9-26-78, 10:21  
Circulated on 48 hour vote basis: 9-26-78, 4:00

70010081121



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE  
FROM: MARJORIE W. EMMONS *mwe*  
DATE: SEPTEMBER 28, 1978  
SUBJECT: Comments Regarding MUR 702 General  
Counsel's Report dated September 18,  
1978

Attached is a copy of Commissioner Tiernan's vote  
sheet with comments regarding the above-named report.

ATTACHMENT  
Copy of Vote Sheet



FEDERAL ELECTION COMMISSION

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

Date and Time Transmitted: Sept. 26, 1978 - 4:00 pm

Commissioner Tierman

RETURN TO OFFICE OF COMMISSION SECRETARY BY: September 28, 1978 - 4:00 pm

MJR No. 702 General Counsel's Report, dated September 18, 1978

- I approve the recommendation
- I object to the recommendation

COMMENTS: Refunded 1977 corp contributions, or adequate explanation of others

Date: 9/26/78 Signature: Robert O. Tierman

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



7901810113

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 )  
Michigan Republican ) MUR 702 (78)  
 )  
State Finance Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 28, 1978, the Commission determined by a vote of 4 - 0

to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Take no further action against the Michigan Republican State Finance Committee. Send letters attached to the General Counsel's Report dated September 18, 1978.
2. Find reason to believe that the Sexton Dairy Company, the Clairmont Transfer Co., and the Borgess Hospital violated 2 U.S.C. §441b(a) by contributing to the Michigan Republican State Finance Committee. Send letters attached to the General Counsel's Report dated September 18, 1978.

Voting for this determination were Commissioners Springer, Tiernan, Thomson, and Harris.

Attest:

9/29/79  
Date

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

Report Date: 9-18-78 Signed: 9-25-78  
Received in Office of Commission Secretary: 9-26-78, 10:21  
Circulated on 48 hour vote basis: 9-26-78, 4:00

709108



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STELF  
FROM: MARJORIE W. EMMONS *mwe*  
DATE: SEPTEMBER 28 19  
SUBJECT: Comments Regarding MUR 702 General  
Counsel's Report dated September 18,  
1978

Attached is a copy of Commissioner Tiernan's vote  
sheet with comments regarding the above-named report.

ATTACHMENT  
Copy of Vote Sheet

7 2 2 4 0 0 3 1 1 2 5



FEDERAL ELECTION COMMISSION

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

Date and Time Transmitted: Sept. 26, 1978 - 4:00 pm

Commissioner Tierman

RETURN TO OFFICE OF COMMISSION SECRETARY BY: September 28, 1978 - 4:00 pm

MUR No. 702 General Counsel's Report, dated September 18, 1978

- I approve the recommendation
- I object to the recommendation

COMMENTS: Refunded 1977 corp contributions, or  
adequate explanation of others

Date: 9/26/78 Signature: Robert O. Tierman

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.



September 26, 1978

MEMORANDUM TO: Marge Emmons  
FROM:; Elissa T. Garr  
SUBJECT: MUR 702

Please have the attached General Counsel's Report on MUR 702 distributed to the Commission on a 48 hour tally basis.

Thank you.

79040084127

RECEIVED  
OFFICE OF THE  
BEFORE THE FEDERAL ELECTION COMMISSION  
September 18, 1978

78 SEP 26 A10: 21

In the Matter of )  
 )  
the Michigan Republican State ) MUR 702  
Finance Committee )

GENERAL COUNSEL'S REPORT

BACKGROUND

A review of the July 10, 1977, and 1977 Year End Report filed by the Michigan Republican State Finance Committee ("the Committee") revealed four contributions which appeared to be corporate contributions and two contributions which appeared to come from labor organizations in violation of 2 U.S.C. §441b(a). (Attachment I). The Committee was notified of the surface violations on May 8, 1978, and on June 21, 1978, the Commission found reason to believe that the Committee violated 2 U.S.C. §441b for acceptance of the subject contributions. The Reports Analysis Division referred this matter to the Office of General Counsel on September 5, 1978 (Attachment II).

LEGAL ANALYSIS

The Committee's July 18, 1978, response to the reason to believe notification stated that (1) the two alleged labor contributions were deposited in their state account; (2) three of the alleged corporate contributions were "returned to sender"; and (3) one alleged corporate contribution was actually

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a partnership check. Upon request, the Committee submitted back-up documentation on September 11, 1978 (Attachment III). The three contributors who are actually corporations have not yet been notified by the Commission of the violations.

The Commission, on July 26, 1978, discussed the subject of civil penalties regarding violations of 2 U.S.C. §441b which prohibits corporate and labor contributions. Based on the Commission's decision, all candidates and committees were notified in August, 1978, that in the future, the Commission would not only require that illegal contributions be refunded, but that civil penalties would be assessed against the contributor and recipient of such contributions. Due to the fact that this matter deals with 1977 contributions, it appears that no further action should be taken against the Committee; however the Commission should find reason to believe that the subject corporations violated 2 U.S.C. §441b(a).

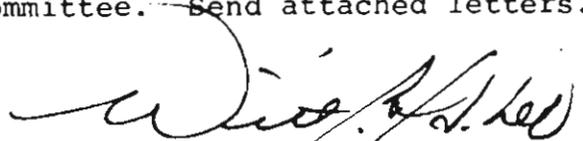
RECOMMENDATION

(1) Take no further action against the Michigan Republican State Finance Committee. Send attached letter.

(2) Find reason to believe that the Sexton Dairy Co., the Clairmont Transfer Co., and the Borgess Hospital violated 2 U.S.C. §441b(a) in connection with contributions to the Michigan Republican State Finance Committee. Send attached letters.

9/25/78

Date



William C. Oldaker  
General Counsel

Attachments

1. List of alleged corporate/labor contributions
2. Referral from Reports Analysis Division
3. Additional Documentation from Committee
4. Proposed letter to Committee
5. Proposed letter to Corporations
6. Certification

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100

CONTRIBUTIONS APPEARING ON THE JULY 10, 1977, and 1977 YEAR  
 END REPORT OF THE MICHIGAN REPUBLICAN STATE FINANCE COMMITTEE

<u>Contributor</u>	<u>Date</u>	<u>Amount</u>	<u>Committee Explanation</u>
Sexton Dairy Company	4-9-77	\$130	Refunded
Santeiu Partnership	5-9-77	\$260	Not a Corporation
Clairmont Transfer Co.	5-25-77	\$130	Refunded
Borgess Hospital	10-11-77	\$300	Refunded
AFL-CIO Council Et Det	5-25-77	\$260	Deposited in State Account
Michigan States Trades Craft	5-77	\$260	Deposited in State Account

2001078413  
MUR

REPORTS ANALYSIS REFERRAL SHEET

DATE: 4/11/78

ANALYST: [Signature]

THROUGH: General Counsel

TEAM CHIEF: [Signature]

THROUGH: STAFF DIRECTOR [Signature]

COMPLIANCE REVIEW: [Signature]

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE COMMITTEE: Michigan Republican State Finance Committee, 600041186

TREASURER: Robert A. Fisher

ADDRESS: 223 N. Walnut Street, Lansing, Michigan 48933

AFFILIATE(S): Not pertinent to allegation

ALLEGATION(S):	CITE:	ATTACHMENT(S):
Receipt of Corporate & Labor Contributions	2 U.S.C. 661b	2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review, AND DATE:

4/11/78

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment I.

PERIOD COVERED FROM 3/1/78 TO 3/31/78

TOTAL RECEIPTS \$ 34,240 TOTAL EXPENDITURES \$ 34,199

CASH ON HAND \$ 181.78 DEBITS \$ 0

HISTORY:

RESULTS OF REVIEW:	ATTACHMENT
38V1/78-28 sent on 5/8/78	3
38V2/78-28 sent on 6/21/78	6

COMMUNICATIONS WITH CANDIDATE COMMITTEE: ATTACHMENT

Telephone: Thompson & Middleton State Employees, Incorporation verified, 4/11/78 4  
 letter, dated 6/13/78, from Tom Bell of the committee 5

REASONS FOR REFERRAL: ATTACHMENT

adequate response received to 38V1/78-28 on 6/21/78 7  
 Corporate and Labor Contributions exceed threshold of 3/15/78 OGC Memorandum

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

None

OTHER RELEVANT INFORMATION:

None

Referrals: None



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20543

May 8, 1978

Robert A. Fisher, Treasurer  
Michigan Republican State  
Finance Committee  
223 North Walnut Street  
Lansing, Michigan 48933

Dear Mr. Fisher:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the July 10 and Year End Reports of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from corporations or unions, which are prohibited by the Act, unless segregated accounts have been established by the corporations or unions. A copy of that portion of your reports is attached for your review and clarification.

The Commission recommends that if you have accepted prohibited contributions that you return the full amounts to the donors. These returns should be reported immediately by letter and should be reflected as expenditures on your next report of receipts and expenditures. If you find your identification of the source of these contributions are incomplete or incorrect, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report by letter.

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Mike Thompson (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter  
Staff Director

Enclosure  
Certified Mail:  
Return Receipt Requested

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FEDERAL ELECTION COMMISSION

1155 K STREET, N.W.  
WASHINGTON, D.C. 20541

June 21, 1978

Robert A. Fisher, Treasurer  
Michigan Republican State  
Finance Committee  
223 North Walnut Street  
Lansing, Michigan 48933

Dear Mr. Fisher:

On May 8, 1978, you were notified that certain entries in the July 10 and Year End Reports of Receipts and Expenditures filed by your committee raised problems under 2 U.S.C. 441b.

As of this date, however, we have received no response from you. Your failure to respond gives the Commission reason to believe that you may have committed a violation of 2 U.S.C. 441b.

The Commission intends to take no action against you until you have had a reasonable opportunity to respond to this letter. This response should be mailed to the Commission within fifteen (15) days from the date of this letter.

If you have responded to the above or you require additional information, please contact Mike Thompson, our Reports Analyst assigned to you on our toll free number (800)424-9530. Our local number is 523-4048.

Sincerely,

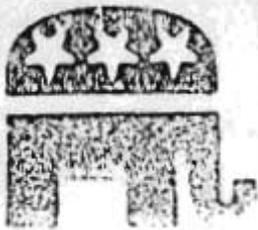
*John D. Walker*

Commissioner

Certified Mail  
Return Receipt Requested

RECEIVED RESPONSE REC'D  
Refer To: Following Form

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# REPUBLICAN STATE FINANCE COMMITTEE

221 N. WALNUT STREET  
TELEPHONE (517) 487-5413

LANSING, MICHIGAN 48211

12:00

July 18, 1978

001876

To Whom It May Concern:

The following is needed to clarify the information marked on the enclosed material. This is in reference to 35V1/78-28.

Sexton Dairy Co.	-----	Check for \$130 returned to sender
Santeiu Partnership	-----	This was not written on a corporate check. Their corporate listing is "John N. Santeiu & Son". The Santeiu partnership is comprised of four people - each involved equally. Ownership of the two tickets was divided among the four partners equally.
Clairmont Transfer Co.	-----	Check for \$130 returned to sender
Borgess Hospital	-----	Check for \$300 returned to sender
APC CIO Council Et Det	-----	Check for \$260 deposited in State Account
Mich. State Trades Craft	-----	Check for \$260 deposited in State Account.

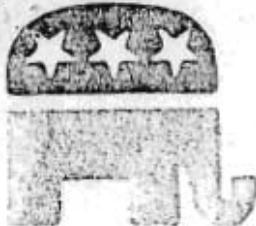
Sincerely,

Fran Hill  
Executive Assistant

Letter written for Robert A. Fisher, Treasurer  
Michigan Republican State Finance Committee  
223 North Walnut Street  
Lansing, Michigan 48223

enclosures

30030684135



*Donaldson*  
**REPUBLICAN STATE FINANCE COMMITTEE**

223 N. WALNUT STREET  
TELEPHONE (517) 487-5413

ATTACHMENT III  
LANSING, MICHIGAN 48933

78 SEP 11 P 1:22  
CC# 4835  
805077

September 7, 1978

To Whom It May Concern:

Enclosed you will find zerox copies of the checks that were sent to individuals or companies in order to return money that we were not able to keep.

The information I received concerning the Santeiu situation was from John Santeiu and the Corporate Record Division in the State of Michigan----- Telephone 517/373-0496.

Thank you for your cooperation and help. We do aim to please and do things the right way.

Sincerely,

*Fran Ball*

Fran Ball  
Executive Assistant

Letter written for Robert A. Fisher, Treasurer  
Michigan Republican State Finance Committee  
223 North Walnut Street  
Lansing, Michigan 48903

enclosures

79040084136







## FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Michigan Republican State Finance  
Committee  
223 N. Walnut Street  
Lansing, Michigan 48933

Re: MUR 702

Dear Mr. Fisher:

On September , 1978, the Commission determined to take no further action against your committee in connection with your acceptance of a contribution from corporations which may have violated 2 U.S.C. §441b(a). The Commission made this determination based on the fact that your Committee refunded the illegal contributions; however, the Commission notified all candidates and committees in August, 1978, that in the future, the Commission would not only require that all corporate and labor contributions be refunded, but that civil penalties would be assessed against the contributor and recipient of such contributions.

Should you have any questions regarding this matter, please call Susan Donaldson at (202) 523-4026.

Sincerely,

William C. Oldaker  
General Counsel

719 914 0 0 8 4 1 3 9

Proposed letter to Sexton Dairy Company, Clairmont Transfer Co., and Borgess Hospital



Attachment V

FEDERAL ELECTION COMMISSION

1125 K STREET N.W.  
WASHINGTON, D.C. 20463

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found that your corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that your corporation violated 2 U.S.C. §441b(a) by making a contribution of \$ on or about , 1977, to the Michigan Republican State Finance Committee. Although we note that the Committee returned this contribution to you by check dated July 11, 1978, the Act was violated when the contribution was originally made. We have numbered this matter MUR 702.

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 Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

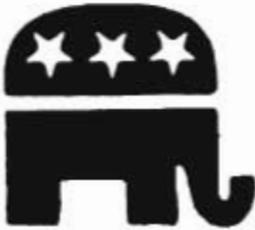
This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

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

70040084143



# REPUBLICAN STATE FINANCE COMMITTEE

223 N. WALNUT STREET  
TELEPHONE (517) 487-5413

RECEIVED  
COMMISSION  
LANSING, MICHIGAN 48933

18 SEP 11 11:22  
4835

803077

September 7, 1978

To Whom It May Concern:

Enclosed you will find zerox copies of the checks that were sent to individuals or companies in order to return money that we were not able to keep.

The information I received concerning the Santeiu situation was from John Santeiu and the Corporate Record Division in the State of Michigan----- Telephone 517/373-0496.

Thank you for your corporation and help. We do aim to please and do things the right way.

Sincerely,

Fran Ball  
Executive Assistant

Letter written for Robert A. Fisher, Treasurer  
Michigan Republican State Finance Committee  
223 North Walnut Street  
Lansing, Michigan 48823

enclosures

70010081141



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29 JUN

100-111-8730-2

CLAIRBANK TRANSFER CO.

100-111-8730-2

*Handwritten signature*

REPUBLICAN NATIONAL BANK  
FOR DEPOSIT ONLY  
Republican State Finance Committee

MICHIGAN REPUBLICAN FINANCE COMMITTEE

223 N. Walnut Street  
Lansing, Michigan 48933

**CERTIFIED**

No. 214831

**MAIL**

ATTENTION: SUSAN DONALDSON  
M.U.R. # 702

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



SEP 11 10:22

FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

1487676

REPORTS ANALYSIS REFERRAL SHEET

DATE 9/5/78

ANALYST Michael Thompson

TO: Office of General Counsel

TEAM CHIEF \_\_\_\_\_

THROUGH: STAFF DIRECTOR OPP

COMPLIANCE REVIEW Lynn A Bowen

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS TH

CANDIDATE/COMMITTEE: Michigan Republican State Finance Committee  
C00041186

TREASURER: Robert A. Fisher

ADDRESS: 223 N. Walnut Street  
Lansing, Michigan 48933

AFFILIATE(S):  
Not pertinent to allegation

ALLEGATION(S):	CITE:	ATTACHMENT(S)
Receipt of Corporate & Labor Contributions	2 U.S.C. 441b	2

MANNER IN WHICH REVIEW WAS INITIATED if other than normal review. AND DATE:

4/11/78

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 1/1/77 TO 3/31/78

TOTAL RECEIPTS \$ 33,240 TOTAL EXPENDITURES \$ 34,199

CASH ON HAND \$ 181.18 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW:	ATTACHMENT
3SV1/78-28 sent on 5/8/78	3
3SV2/78-28 sent on 6/21/78	6

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT

Telecon: Thompson & Michigan State Employee, incorporation verified, 4/11/78	4
Letter, dated 6/13/78, from Fran Ball of the committee	5

REASON(S) FOR REFERRAL: ATTACHMENT

adequate response received to 3SV2/78-28 on 6/21/78	7
Corporate and Labor Contributions exceed threshold of 3/15/78 OGC Memorandum	

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT

None

OTHER RELEVANT INFORMATION:

None

Previous Referrals: None

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FEDERAL ELECTION COMMISSION  
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 24JUL78  
PAGE 1

PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
								IB# C00041106
MICHIGAN REPUBLICAN STATE FINANCE COMMITTEE								
CONNECTED ORGANIZATION: MICHIGAN REPUBLICAN STATE COMMITTEE								
	1977 DEBT SETTLEMENT STATEMENT AMENDMENT					24AUG77	2	77FEC/062/1653
	MISCELLANEOUS TRANSACTION TO F.E.C.					27SEP77	5	77FEC/062/1661
	DEBT SETTLEMENT STATEMENT AMENDMENT					25OCT77	1	77FEC/062/1673
	1978 MISCELLANEOUS TRANSACTION TO F.E.C.					18JUN78	2	78FEC/076/4600
	1977 APRIL 10 QUARTERLY	130,272		125,583		1JAN77 -31MAR77	393	77FEC/051/4673
	REQUEST FOR ADDITIONAL INFORMATION					1JAN77 -31MAR77	4	77FEC/062/1651
	APRIL 10 QUARTERLY - AMENDMENT					1JAN77 -31MAR77	2	77FEC/062/1659
	JULY 10 QUARTERLY	273,323		244,219		1APR77 - 1JUL77	291	77FEC/055/4748
	REQUEST FOR ADDITIONAL INFORMATION					1APR77 -30JUN77	3	77FEC/057/4664
	REQUEST FOR ADDITIONAL INFORMATION					1APR77 -30JUN77	5	77FEC/062/1666
	REQUEST FOR ADDITIONAL INFORMATION					1APR77 -30JUN77	2	78FEC/073/4262
	REQUEST FOR ADDITIONAL INFORMATION					1APR77 -30JUN77	7	78FEC/073/4265
	REQUEST FOR ADDITIONAL INFORMATION					1APR77 -30JUN77	3	78FEC/076/4562
	JULY 10 QUARTERLY - AMENDMENT					1APR77 -30JUN77	5	77FEC/058/3934
	JULY 10 QUARTERLY - AMENDMENT					1APR77 -30JUN77	1	77FEC/062/1675
	JULY 10 QUARTERLY - AMENDMENT					1APR77 -30JUN77	4	78FEC/074/1815
	OCTOBER 10 QUARTERLY	117,544		117,207		1JUL77 -30SEP77	14	77FEC/060/1421
	OCTOBER 10 QUARTERLY - AMENDMENT					1JUL77 -30SEP77	114	78FEC/072/1617
	YEAR END REPORT	131,279		169,871		1OCT77 -31DEC77	100	78FEC/065/1967
	REQUEST FOR ADDITIONAL INFORMATION					1OCT77 -31DEC77	1	78FEC/073/4499
	REQUEST FOR ADDITIONAL INFORMATION					1OCT77 -31DEC77	2	78FEC/076/4565
	1978 APRIL 10 QUARTERLY	240,376		208,059		1JAN78 -31MAR78	475	78FEC/072/1731
	REQUEST FOR ADDITIONAL INFORMATION					1JAN78 -31MAR78	3	78FEC/076/4567
	JULY 10 QUARTERLY	142,276		167,074		1APR78 -30JUN78	197	78FEC/079/3711
	TOTAL	1,035,570	0	1,032,893	0		1636	TOTAL PAGES

SV →  
CORP/LABOR

*All documents reviewed*

EXIT

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\*\*\* REPORT A \*\*\* ALL DONATIONS EXCEPT COUNTY COMMITTEES \*\*\*

DATE	NAME	ADDRESS	CITY	MI	ZIP	AMOUNT	BALANCE
04/15/77	W. Thompson	2140 HUBERT RD	BRIGHTON	31405	48116TR4274047	250.00**	250.00
					MI 48116		
					WICH THOMPSON CHIEF SATHAINERS		
04/15/77	W. Tidwell	222 HUBBELL ST	BRIGHTON	31405	48217IN5224064	130.00**	130.00
					MI 48217		
04/15/77	T. Tims	275 LEWIS ST	ADRIAN	31405	49221TIN4544545	100.00**	100.00
					MI 49221		
04/15/77	W. Tobias	227 CITY HALL BLD	DETROIT	31405	48226TC106270162	130.00**	130.00
					MI 48226		
					TOBIAS & SNEYDY		
04/15/77	W. Thomas	REBECCA A	TRAVERSE CITY	31405	49654TCR R 28	130.00**	130.00
					MI 49654		
					RETIRED FARMER		
04/15/77	W. Trites	3840 WILSON DR	ANN ARBOR	31405	48217TD153304164	130.00**	130.00
					MI 48217		
					ANN ARBOR		
04/15/77 -R	T. Trosko	704 W. FORT ST	TECUMSEH	32422	49057TCB7042046	100.00**	100.00
					MI 49226		
					RETIRED		
04/15/77	W. Young	20230 BELLESLY	RIVERVIEW	31405	48169TCLJ2023062	130.00**	130.00
					MI 48169		
					ARTHUR YOUNG & CO		
04/15/77	W. Townsend	17175 SANTA ROSA	DETROIT	31405	48221TONL1717502	100.00**	100.00
					MI 48221		
					ATTORNEY		
04/15/77 -AS	T. Trosko	1009 BERRISFIRE RD	ANN ARBOR	30406	48104TOS1009061	5000.00	5000.00
					MI 48104		
					U OF MICH ANN ARBOR MI		
04/15/77 -AS	T. Trosko	1000 BERRISFIRE RD	ANN ARBOR	30406	48104TOS1000061	10000.00**	5000.00
					MI 48104		
					U OF MICH ANN ARBOR MI		
04/15/77	W. Trades Craft	119 S WASHINGTON	LANSING	31405	48207TRDM4195 33	200.00**	200.00
					MI 48203		
04/15/77	TRANSFER CO	1203 7TH AVENUE N	CLAIRBONT	31405	48226TRN1203021	100.00**	100.00
					MI 48226		

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\*\*\*\*\* REPORT A \*\*\*\*\* ALL LOCATIONS EXCEPT COUNTY GOVERNMENTS \*\*\*\*\*

DATE	NAME	ADDRESS	CITY	STATE	ZIP	ACCT NO	AMOUNT	PERIOD
04/20/77	(15)	FRANKLIN WASHINGTON 200355E-1405	UNKLES	MI	48117	Y 0404701	130.00**	130.00
04/20/77	(13)	200355E-1405	REDFORD	MI	48240	482-0490J2005E92	130.00**	130.00
04/20/77	(11)	ACT COMM 115 E NORTH ST	BRIGHTON	MI	48110	481-1640 M115E 47		130.00
						STANDARD BRED CR. INS MI POL COMM		
04/20/77	(11)	ACT COMM 115 E NORTH ST	BRIGHTON	MI	48110	481-1640 M115E 47	260.00**	130.00
						STANDARD BRED CR. INS MI POL COMM		
04/20/77	(15)	ADAMS 931 WEST HAWSDALE CAMPION OF THE BFD	BLOOMFIELD HILLS	MI	48313	483-1340M548K163	130.00**	130.00
						CAMPBELL-EMALD COMPANY		
04/20/77	(15)	ADAMS 546 KINGSLEY TRL EAGLE VP	BLOOMFIELD HILLS	MI	48313	483-1340M548K163	130.00**	130.00
						FEDERAL MOELL CORP		
04/20/77		ADAMS 1424 FRANKLIN DR MFCR	BIRMINGHAM	MI	48310	483-1040L1424R63	100.00**	100.00
						ADAMS MANUF CO MOVI		
05/13/77	(15)	ALPAY 20214 CARLYLE BUSINESS	DEARBORN	MI	48124	481-2440A20214R62	130.00**	130.00
						ALPAY APPL & PHOTO EXTR INC		
05/25/77	(15)	AFL CIO COUNCIL ET MET 2310 CASS AVENUE	DETROIT	MI	48201	482-0140M2310A92	260.00**	260.00
05/25/77	(19)	ALEXANDER 1407 S FAIRVIEW AD-ASST EXEC OFFICE	LANSING	MI	48912	489-1240L1407N 33	130.00**	130.00
04/20/77	(15)	ALLEN 676 KELLEY DR RETIRED	SIRMINGHAM	MI	48608	486-0640R676R603	130.00**	130.00
						FIRST FEDERAL		
05/22/77	(15)	ALLEY 1912 PARKWOOD PLACE	CLARE	MI	48617	486-1740L1912PA16	130.00**	130.00
05/12/77	(15)	ALLEY 400 WASHINGTON SQ JUDGE	LANSING	MI	48933	489-3340L400WA33	260.00	

U 2 C V LANSING COURT OF APPEALS

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MICHIGAN REPUBLICAN FINANCE COMMITTEE  
 \*\*\* REPORT A \*\*\* ALL DONATIONS EXCEPT COUNTY COMMITTEES \*\*\*

RUN DATE: 01/12/78 PAGE: 2

DONATIONS GREATER THAN \$100.00

DETAIL FOR DATE 10/01/77 THRU 12/31/77

DATE	NAME AND ADDRESS	AGGR YTD	PERIOD
10/13/77	PENSON C 20229 W 14 MILE RD BIRMINGHAM BUSINESS EXECUTIVE	31404 SF-0004714-1 MI 48010	100.00** 100.00
10/13/77 MS	BENTLEY A 301 N OLIVER ST <i>Lansing</i>	31404 SF-0048105-5 MI 48107	1,000.00** 1,000.00
10/13/77	RIXBY H 13855 W MCNICOLS DETROIT RETIRED	31403 SF-0035210-1 MI 48219	100.00** 100.00
10/13/77 MR	BLACKMON A 6101 PLANTATION DR GRAND BLANC GEN MGR	31404 SF-0041479-4 MI 48039	300.00** 300.00
10/13/77 MR	BONNER A 229 VESTER FERRISDALE EXECUTIVE	31403 SF-0033831-3 MI 48220	700.00** 600.00
10/13/77 MR	BOOTH H 700 CRAWFORD RD BLOOMFIELD HILLS RETIRED	31404 SF-0006827-4 MI 48303	100.00** 100.00
10/13/77	BURGESS HOSP INC 7-5-27 1011021011773140 KALAMAZOO 80030000	31404 SF-0090358-5 MI 49001	300.00** 300.00
10/13/77 MR	HUOY C 776 ARLINGTON BIRMINGHAM BANKER	31404 SF-0004231-4 MI 48109	100.00** 100.00
10/13/77 MS	BOYKIN H 330 BROOKBRIDGE DETROIT PUBLIC RELATIONS	31405 SF-0031326-5 MI 48202	300.00** 300.00
10/13/77	GRADY JERRY 20760 COLLIDGE RD OAK PARK J GRADY & SONS INC	31404 SF-0090402-4 MI 48237	500.00** 500.00
10/13/77 MR	BRAUN P 712 STILL BLDG FLINT INSURANCE	10400 SF-0042335-4 MI 48502	700.00** 200.00
10/13/77 MR	BREEDEN R 2549 WOODBURY DRIVE GRAND BLANC MI 48439	31404 SF-0041517-4	100.00** 100.00
10/13/77 MS	BRESLIN J 945 PEARLERWOOD LN E LANSING U.P. MSU 690 V E L U 8 L	31404 SF-0046377-3 MI 48523	500.00** 500.00

1038115

MICHIGAN REPUBLICAN FINANCE CO. STATE \*\*\* REPORT A \*\*\* ALL DONATIONS EXCEPT COUNTY COMMITTEES \*\*\* RUN DATE: 01/11/77 PAID: 11

DATE	NAME	ADDRESS	CITY	STATE	ZIP	AMOUNT	PERIOD
01/11/77	TRONCOURT	100 2740 HUNLINT RD	BRIGHTON	MI	48116	200.00**	200.00
01/11/77	TED JILL	5-N 232 HUBBELL ST	HUGHTON	MI	48021P	100.00**	100.00
01/11/77	TOMAS	396 LEWIS ST	ADRIAN	MI	49221	100.00**	100.00
01/11/77	TORIAS	627 CITY HAT BK BLD	DETROIT	MI	48226	100.00**	100.00
01/11/77	TORIAS	4925 R 28	TRAVERSE CITY	MI	49664	100.00**	100.00
01/11/77	TORIAS	5 3540 RIDGEMORE DR	ANN ARBOR	MI	48104	100.00**	100.00
01/11/77	TOWNS	704 E. FRANKLIN	TECUMSEH	MI	49206	100.00**	100.00
01/11/77	TOWLE JR	20230 ELLESLEY	RIVERVIEW	MI	48100	100.00**	100.00
01/11/77	TOWSEND	1400 E. WASHINGTON	DETROIT	MI	48221	100.00**	100.00
01/15/77	TOWSLEY	1000 BENSHIRE RD	ANN ARBOR	MI	48104	5,000.00**	5,000.00
01/15/77	TOWSLEY	1000 BENSHIRE RD	ANN ARBOR	MI	48104	10,000.00**	5,000.00
01/15/77	TRADES	119 S WASHINGTON	LANSING	MI	48933	200.00**	200.00

01/15/77 TRANSFER COMPANY CLEARING INC. S-15-47 31405 49629TR01207721 100.00\*\* 100.00  
 1003 7TH AVENUE N.E. ANN ARBOR MI 48106

1 1 5 5  
 \*\*\* REPORT A \*\*\* ALL DONATIONS EXCEPT COUNTY COMMITTEES \*\*\*

CONTRIBUTORS LISTED FROM 05/01/77  
 DATE FOR DATE 05/01/77 TO 05/30/77

DATE	NAME	ADDRESS	CITY	STATE	ZIP	AMOUNT	PERIOD
05/01/77	ACIUCO	34775 WOOD	LIVONIA	MI	48152	390.00**	390.00
05/01/77	ADAMS	29001 FAIRMOUNT	DEARBORN	MI	48124	130.00**	130.00
05/01/77	ADAMS	23021 HOLLANDER	DEARBORN	MI	48124	130.00**	130.00
05/01/77	ALAZZOLI	7205 E ADAMS	DETROIT	MI	48212	250.00**	250.00
05/01/77	ALLEN	1047 NILES CT	MUSKOGON	MI	49845	130.00**	130.00
05/01/77	ALLEN DC	51 W SOUTH AVE	HESPERIA	MI	49421	130.00**	130.00
05/25/77	ALLEN JR	724 HARBOR DRIVE	NAVISTEE	MI	49660	130.00**	130.00
05/01/77	AMSTERDAM	1137 WISTER RD	GARDEN CITY	MI	48135	250.00**	250.00
05/12/77	ANDREOLA	65120 J77051231405	JACKSON	MI	49241	130.00**	130.00
05/12/77	ANDERSON	3429 CANTON	DETROIT	MI	48226	130.00**	130.00
05/01/77	ANDERSON	746 W HIGH POS 747	JACKSON	MI	49204	130.00**	130.00
05/01/77	ANDERSON	426 NAKOIA	GRAND RAPIDS	MI	49504	130.00**	130.00

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MICHIGAN REPUBLICAN FINANCE COMMITTEE  
 \*\*\* SPEND ALL MONIES EXCEPT COUNTY COMMITTEES \*\*\*

SUN DATE 10/30/77 PAGE 19

COMMITTEE REPORT FROM 5/1/77 TO 9/30/77  
 DATE 10/30/77

DATE	NAME	ADDRESS	CITY	MARKET OPINION RESEARCH	ACCR YTD	PERIOD
05/16/77	<del>(5) DANIELS</del>	65120377051231405	UNKNOWN	31405 494400LH0513761 MI	130.00**	130.00
05/20/77	<del>12</del> CHARLES W. WATSON PRESIDENT	21675400561000	ROCHESTER	31405 484300ARC305TA63 MI 48063	130.00**	130.00
05/20/77	<del>12</del> HARRY RETIRED	21675400561000	SOUTHFIELD	31405 480750AHM216R063 MI 48075	130.00**	130.00
05/20/77	<del>(5) DAIRY CO</del>	25020500THFIELD RD	SOUTHFIELD	31405 480750ARS25AS063 MI 48075	130.00**	130.00
05/15/77	JALTON RETIRED	1133 SOUTH RD	KALAMAZOO	30400 494010ATO113SH39 MI 49001	1,000.00**	1,000.00
05/14/77	<del>15</del> RICHARD PRESIDENT	504 BOJTELL DR	GRAND BLANC	31405 484390LYR5845025 MI 48439	130.00**	130.00
05/10/77	<del>15</del> JAMES LT GOVERNOR	7161 DELTA RIVER DR	LANSING	31405 484600ARJ716DE33 MI 48905	130.00**	130.00
05/12/77	<del>(15) DANIELS</del>	65120377051231405	UNKNOWN	31405 494410AIC0513761 MI	130.00**	130.00
05/13/77	<del>15</del> FREDERICK ATTORNEY	3065 PENNSCOTT BLDG	DETROIT	31405 482260ADF305PE22 MI 48226	130.00**	130.00
05/13/77	<del>15</del> TOM OWNER	25655003 RD	NOVI	31405 481500ALT256ND63 MI 48050	130.00**	130.00
05/14/77	<del>15</del> F. W. MCELLEN OWNER	104 W. MCELLEN PTE	CASSOPOLIS	31405 490310ASF RR14 MI 49031	130.00**	130.00
05/10/77	<del>15</del> CHARLES LIFE INSURANCE	3001 N. VIG HEAVEN	TROY	31405 484640AEC306W 63 MI 48064	130.00**	130.00
05/10/77	<del>15</del> JOSEPH			31405 480130AEC193HI53	130.00**	130.00



FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.  
WASHINGTON, D.C. 20463

May 8, 1978

Robert A. Fisher, Treasurer  
Michigan Republican State  
Finance Committee  
223 North Walnut Street  
Lansing, Michigan 48933

Dear Mr. Fisher:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the July 10 and Year End Reports of Receipts and Expenditures, we noticed entries indicating that you may have accepted contributions from corporations or unions, which are prohibited by the Act, unless segregated accounts have been established by the corporations or unions. A copy of that portion of your reports is attached for your review and clarification.

The Commission recommends that if you have accepted prohibited contributions that you return the full amounts to the donors. These returns should be reported immediately by letter and should be reflected as expenditures on your next report of receipts and expenditures. If you find your identification of the source of these contributions are incomplete or incorrect, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report by letter.

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Mike Thompson (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter  
Staff Director

Enclosure  
Certified Mail:  
Return Receipt Requested

7  
2  
7  
6  
14  
11  
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6  
20  
2

DEBITIVE CHECKED FROM SECTION  
DATE 05/20/77 TO 05/20/77  
DATE 05/20/77 TO 05/20/77

AMOUNT PERIOD

DATE	NAME	ADDRESS	CITY	STATE	AMOUNT	PERIOD
05/22/77	<del>15</del> PRESIDENT	05120377051201405	UNKOWN	MI	130.00**	130.00
05/22/77	<del>15</del> PRESIDENT	300 TAYLOR	RICHMOND	MI	130.00**	130.00
05/22/77	<del>15</del> PRESIDENT	210754041201405	SOUTHFIELD	MI	120.00**	120.00
05/22/77	<del>15</del> PRESIDENT	250205041201405	SOUTHFIELD	MI	130.00**	130.00
05/25/77	WALTER	1133 SOUTH RD	KALAMAZOO	MI	1,000.00**	1,000.00
05/25/77	<del>15</del> PRESIDENT	504 603 TELL DR	GRAND BLAND	MI	130.00**	130.00
05/25/77	<del>15</del> PRESIDENT	7161 DELTA RIVER DR	LANSING	MI	130.00**	130.00
05/25/77	<del>15</del> PRESIDENT	05120377051201405	UNKOWN	MI	130.00**	130.00
05/25/77	<del>15</del> PRESIDENT	3065 PENNACOTT BLDG	DETROIT	MI	130.00**	130.00
05/25/77	<del>15</del> PRESIDENT	250551011 RD	NOVI	MI	130.00**	130.00
05/25/77	<del>15</del> PRESIDENT	104 W. ELL PTE	CASSPOLIS	MI	130.00**	130.00
05/25/77	<del>15</del> PRESIDENT	3001 W 110 WYVERN	TRUY	MI	130.00**	130.00
05/25/77	<del>15</del> PRESIDENT	JUSON	Y Y C L Z	MI	130.00**	130.00

Life Insurance

7 7 0 3 0 3 3 9 9 3 7

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MICHIGAN REPRODUCTION FUND COMMITTEE  
 \*\*\* REPORT A \*\*\* ALL DONATIONS EXCEPT COUNTY COMMITTEES \*\*\*

RUN DATE: 05/30/77 PAGE: 02

QUANTITIES GREATER THAN 100000  
 -DETAIL FOR DATE 05/01/77 THRU 05/31/77  
 DATE

DATE	NAME	ADDRESS	CITY	STATE	ZIP	ASGR YTD	PERIOD
04/01/77	FRANCESCO	3450 E. 14 <sup>TH</sup> AVE 20775 WAPGA	LIVONIA	MI	48152	390.00**	390.00
04/01/77	FRANCZESKI	FRANK 25001 FAIRMOUNT	DEARBORN	MI	48124	130.00**	130.00
04/01/77	FRANCZESKI	RICHARD 23021 HOLLANDER	DEARBORN	MI	48124	130.00**	130.00
4/05/77	FALAZZOLA	JOHN 7205 E. 40 <sup>TH</sup> AVE	DETROIT	MI	48212	250.00**	250.00
04/05/77	FALLEN	4	WHITE CLOUD	MI	49349	130.00**	130.00
04/05/77	FALLEN	THOMAS 1047 WILSON CT	MUSKEGON	MI	49445	130.00**	130.00
04/05/77	FALLEN DC	TERRY 51 " SOUTH AVE	HESPERIA	MI	49421	130.00**	130.00
05/25/77	FANNES JR	WARRE 724 HARBOUR DRIVE	WARRE	MI	49650	130.00**	130.00
05/01/77	FARTHERSHIP	THE SANTEIU PARTNERSHIP 1137 W. WALTER RD	GARDEN CITY	MI	48135	260.00**	260.00
05/12/77	FISHERA	0	JACKSON	MI	49204	130.00**	130.00
05/12/77	FITZGERALD	FREDERICK 2424 CADILLAC	DETROIT	MI	48226	130.00**	130.00
04/01/77	FITZGERALD	" 746 W. HIGH POB 747	JACKSON	MI	49204	130.00**	130.00
05/13/77	FITZGERALD	PRISCILLA 426 MADISON	ZEPHYRUS CITY	MI	49634	130.00**	130.00

7001031158

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MICHIGAN REPUBLICAN FINANCE COMMITTEE  
 \*\*\* REPORT A \*\*\* ALL DONATIONS EXCEPT COUNTY COMMITTEES \*\*\*

RUN DATE: 01/30/77 PAGE: 11

DONATIONS GREATER THAN \$100.00

PERIOD FOR DATE 01/01/77 TO 01/31/77

DATE	NAME AND ADDRESS	CITY	STATE	ZIP	AMOUNT	PERIOD
01/01/77	THORNTON, JOP 2740 HIGHT RD	BRIGHTON	MI	48116	200.00**	200.00
01/01/77	TIDWELL, S-H 222 HURDELL ST	HUGHTON	MI	48218	100.00**	100.00
01/01/77	TINNS, JOHN 596 LEWIS ST	ADRIAN	MI	49221	100.00**	100.00
01/01/77	TODIAS, GEORGE 227 CITY HAT BK BLD	DETROIT	MI	48226	100.00**	100.00
01/13/77	TOWNS, REBECCA R 1	TRAVERSE CITY	MI	49604	100.00**	100.00
01/01/77	TOWLES, S 3540 WINDSOR DR	ANN ARBOR	MI	48106	100.00**	100.00
01/01/77 -R	TOWNS, JENS 704 W FORTANTANIC	TECUMSEH	MI	49206	100.00**	100.00
01/01/77	TOWLE JR, JOHN 20230 ELLESLY	RIVERVIEW	MI	48150	100.00**	100.00
01/01/77	TOWSEND, LINDIE 21455 TAHOA	DETROIT	MI	48221	100.00**	100.00
01/15/77 -RS	TOWSLEY, WERT 1000 BENSHPHIRE RD	ANN ARBOR	MI	48104	5,000.00	5,000.00
01/12/77 -RS	TOWSLEY, HANNY 1000 BENSHPHIRE RD	ANN ARBOR	MI	48104	10,000.00**	5,000.00
01/01/77	TRADES CRAFT, HIGH STATE 419 S WASHINGTON	LANSING	MI	48933	200.00**	200.00

01/25/77

TRANSFER COMPANY, CLAIRMONT, INC. S-15-47  
 203 7TH AVENUE NE, OCCASION

31405 49629TRHC1807T21 MI 48298 100.00\*\* 100.00

78030652935  
72010783135

DONATIONS GREATER THAN \$100.00  
 DETAIL FOR DATE 10/01/77 THRU 12/31/77  
 DATE NAME AND ADDRESS AGGR YTD PER100

10/13/77 HENSON C 31408 SF-0004714-1 100.00\*\* 100.00  
 20999 W 14 MILE RD BIRMINGHAM MI 48010  
 BUSINESS EXECUTIVE

10/11/77 HENSLEY A 31404 SF-0049105-5 100.00\*\* 100.00  
 201 W OLIVER ST BROSSO MI 48167  
*Lansing*

10/13/77 RITBY H 31405 SF-0035210-1 100.00\*\* 100.00  
 13845 W MCNICOLS DETROIT MI 48219  
 RETIRED EXCELLO CORP

10/13/77 MR BLACKMON A 31404 SF-0041479-4 300.00\*\* 300.00  
 6101 PLANTATION DR GRAND BLANC MI 48439  
 GEN MGR MECHANICAL DESIGN/ENG

10/13/77 MR BONNER A 31408 SF-0033831-3 700.00\*\* 600.00  
 229 VESTER FERRISLE MI 48220  
 EXECUTIVE A T & G CO 30790 W A MI FARMIN

10/13/77 MR BOUTH H 31409 SF-0006827-4 100.00\*\* 100.00  
 700 CHANDLER RD BLOOMFIELD HILLS MI 48303  
 RETIRED

10/11/77 BURGESS HOSP INC 7-5-27 31404 SF-0090358-5 300.00\*\* 300.00  
 1011021011773140 KALAMAZOO MI 49001  
 80010000 BURGESS HOSP

10/13/77 MR BUYS C 31404 SF-0004231-4 100.00\*\* 100.00  
 776 ARLINGTON BIRMINGHAM MI 48109  
 BANKER DETROIT BK & TRST

10/21/77 HRS BOYKIN U 31405 SF-0031326-5 300.00\*\* 300.00  
 330 TRUARRIDGE DETROIT MI 48202  
 PUBLIC RELATIONS WOPR-TV 62

10/13/77 BRADY JERRY 31408 SF-0090402-4 500.00\*\* 500.00  
 20760 CONLIDGE #200 OAK PARK MI 48237  
 J BRADYSONS INC

12/30/77 MR BRAUN P 30400 SF-0042335-4 700.00\*\* 200.00  
 712 SILL BLDG FLINT MI 48502  
 INSURANCE BRAUN & BRAUN INC

10/13/77 MR BREEDEN R 31408 SF-0041517-4 100.00\*\* 100.00  
 2549 WOODMONT DRIVE GRAND BLANC MI 48439

11/21/77 HRS BRISLIN J 31404 SF-0046377-3 500.00\*\* 500.00  
 945 PERLERWOOD LN E LANSING MI 48923  
 U.P. MSU 690 V E L C U 8 L

7703051015  
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RECEIVED

MICHIGAN REPUBLICAN FINANCE COMMITTEE  
 \*\*\* REPORT A \*\*\* ALL DONATIONS EXCEPT COUNTY COMMITTEES \*\*\*

RUN DATE 05/30/77 PAGE 1

DEBITAL BALANCE FWD 510.00

DEBITAL BALANCE DATE 12/31/77 12/31/77

DATE	NAME	ADDRESS	CITY	STATE	ZIP	ACCR YTD	PERIOD
05/09/77	(15) YPSILANTI	WASHINGTON 2409477600-31405	UNKNOWN	MI	48157	130.00**	130.00
05/09/77	(13) ADRI	JACAL 200355 EIRLE	REDFORD	MI	48240	130.00**	130.00
05/09/77	(11) ACT COMM	DECK POL 115 E NORTH ST	BRIGHTON	MI	48116	130.00	130.00
05/09/77	(11) ACT COMM	DECK POL 115 E NORTH ST	BRIGHTON	MI	48116	260.00**	130.00
05/09/77	(15) ADAMS	THOMAS 931 WEST HAWSCALE CAMPBELL OF THE MID	BLOOMFIELD HILLS	MI	48313	130.00**	130.00
05/09/77	(15) ADAMS	WILLIAM 540 NIMOSLEY TRL EXEC VP	BLOOMFIELD HILLS	MI	48313	130.00**	130.00
05/09/77	ACELL	FRANKLIN 1429 ARBROOK DR MFRS	BIRMINGHAM	MI	45010	100.00**	100.00
05/13/77	(13) ACPAY	MICHAEL 20219 CARLISLE BUSINESS	DEARBORN	MI	48124	130.00**	130.00
05/25/77	(13) AFL CIO COUNCIL	DET DET 2310 CASS AVENUE	DETROIT	MI	48201	200.00**	260.00
05/25/77	(19) ALEXANDER	ROBERT 1407 W PATRIOT ADV ASSI EXEC OFFICE	LANSING	MI	48912	130.00**	130.00
05/09/77	(15) ALIBEN	JAMES 476 HEMLEY DR RETIRED	BIRMINGHAM	MI	45008	130.00**	130.00
05/12/77	(15) ALLEN	MARBARA 1412 PARKWOOD PLACE	CLARE	MI	48617	130.00**	130.00
05/12/77	(15) ALLEN	BLENN 400 WASHINGTON SQ JUDGE	LANSING	MI	48233	260.00	260.00

U 2 C V LANSING COURT OF APPEALS



MEMO TO THE FILES:

TELECON

DATE: April 11, 1978

Person Spoken To: Employee of the State of Michigan - Secy of State; Corp Div.

Person Calling: Mike Thompson

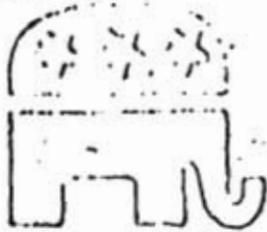
Subject: Verifying dates of incorporation (if incorporated) of several  
businesses in Michigan

(MICHIGAN REPUBLICAN STATE FINANCE COMMITTEE)

I called the Secy of States Office (Corp Div) today to verify whether or not certain businesses were corporations or not. These businesses had been listed on Michigan Republican State Finance Committee as contributors to the committee.

Indeed, several were listed in Michigan as corporations.

20040781152



# REPUBLICAN STATE FINANCE COMMITTEE

273 N. WALNUT STREET  
TELEPHONE (517) 487-5413

LANSING, MICHIGAN 48233

June 13, 1978

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

Attention: Orlando B. Potter

Dear Mr. Potter:

In reference to your letter of 5/8/78 # 3SV1/78-28, I am trying to clarify the information. As soon as I have the proper information, I will send it to you.

Thank you for being patient.

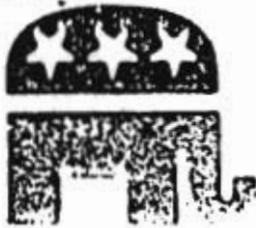
Sincerely,

Fran Ball  
Executive Assistant  
Republican State Finance Committee

for: Robert A Fisher, Treasurer

780304811851375





# REPUBLICAN STATE FINANCE COMMITTEE

223 N. WALNUT STREET  
TELEPHONE (517) 487-5413

LANSING, MICHIGAN 48211

12:00

July 18, 1978

CG1878

To Whom It May Concern:

The following is needed to clarify the information marked on the enclosed material. This is in reference to 33V1/78-28.

Sexton Dairy Co.	-----	Check for \$130 returned to sender
Santeiu Partnership	-----	This was not written on a corporate check. Their corporate listing is "John N. Santeiu & Son". The Santeiu partnership is comprised of four people - each involved equally. Ownership of the two tickets was divided among the four partners equally.
Clairmont Transfer Co.	-----	Check for \$130 returned to sender
Borgess Hospital	-----	Check for \$300 returned to sender
AFL CIO Council Et Det	-----	Check for \$260 deposited in State Account
Mich. State Trades Craft	-----	Check for \$260 deposited in State Account.

Sincerely,

Fran Hill  
Executive Assistant

Letter written for Robert A. Fisher, Treasurer  
Michigan Republican State Finance Committee  
223 North Walnut Street  
Lansing, Michigan 48223

enclosures

33V1/78-28



FEDERAL ELECTION COMMISSION

1125 K STREET NW  
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 702

Date Filmed 1/12/79 Camera No. --- 2

Camcraan GPC