



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 707

DATE: 10/5/78

FILMED BY: WAB



FEDERAL ELECTION COMMISSION

Internal memos within the Office of the Comptroller
of the Currency

Reference to a separate MUR in the referral
letter

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 checked="" 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 checked="" type="checkbox"/> (5) Internal Documents | |

Signed

Miriam Legman

date

9/21/78

FEC 9-21-77

78040070236

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Richard E. Turner, President)	MUR 707
Westside National Bank of)	
Manatee County)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 21, 1978, the Commission determined by a vote of 6 - 0, to adopt the recommendation of the General Counsel to take the following action in the above-captioned matter:

Take no further action against Richard E. Turner or the Westside National Bank of Manatee County and close the file.

Attest:

9/21/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

78040070237

September 15, 1978

MEMORANDUM TO: Marge Emmons
FROM: Blissa T. Carr
SUBJECT: MUR 707

Please have the attached First General Counsel's Report on MUR 707 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040070238

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL SEP 15 1978
BY OGC TO THE COMMISSION _____

MUR NO. 707
DATE COMPLAINT RECEIVED _____
BY OGC _____
STAFF _____
MEMBER Aguiar

SOURCE: Referral from Comptroller of the Currency
Administrator of National Banks, Washington,
D.C.

RESPONDENT'S NAME: Richard E. Turner, President
Westside National Bank of Manatee County
Bradenton, FL

RELEVANT STATUTE: 2 U.S.C. §441b

INTERNAL REPORTS CHECKED:

FEDERAL AGENCIES CHECKED:

BACKGROUND

The Commission received a referral from the Comptroller of the Currency on September 5, 1978 alleging that on June 28, 1978 respondent signed a bank expense check in the amount of \$75 to the Manatee County Republican Executive Committee for purchase of barbeque tickets in violation of 2 U.S.C. §441b. Mr. Turner subsequently reimbursed the \$75 from his personal funds when advised of the illegality of the expenditure by the Comptroller's office.

ANALYSIS

2 U.S.C. §441b(a) prohibits contributions in connection with any election to any political office made by any national bank. Further, it prohibits any bank officer from consenting to any such contribution. "Contribution" is defined by 2 U.S.C. §441b(b)(2) to include direct payments or anything of value to any political party or organization in connection with any election to any political office.

The small amount of the contribution and the prompt reimbursement by Mr. Turner of the \$75 from his personal funds when he was notified of the violation, argue against any further action against respondent bank or bank president.

RECOMMENDATION

Take no further action against the Westside National Bank or its president, Richard E. Turner, and close the file.

78040070240

September 6, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: Referral from the Compt of the Currency

Please have the attached referral distributed to
the Commission for their information.

Thank you.

78040070241

600+ 4767

RECEIVED
FEDERAL ELECTION
COMMISSION

Comptroller of the Currency
Administrator of National Banks

78 SEP 5 P 1:13

Washington, D. C. 20219

September 1, 1978

005937

Federal Election Commission
Attention: Mr. Brad Litchfield
1325 K Street, NW
Washington, DC 20463

Gentlemen:

Two matters involving possible violations of 2 U.S.C. §441b have recently been received by the Enforcement and Compliance Division of the Comptroller of the Currency's Office. Since primary jurisdiction over this statute rests with your agency, we are forwarding documents describing the fact patterns with this letter for whatever action you deem appropriate. Brief descriptions of the alleged offenses follow.

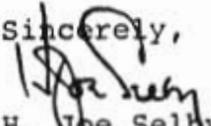
8040077291

On June 28, 1978, Richard E. Turner, president of the Westside National Bank of Manatee County, Bradenton, Florida, signed a check in the amount of \$75 which was made payable to the Manatee County Republican Executive Committee. The check was used to purchase barbeque tickets which were distributed among bank employees. The \$75 was reimbursed to the bank by Mr. Turner when he was advised of the illegal nature of the expense.

MUR 707

If we can be of any further assistance or can provide any additional information, please contact Mr. Peter E. Rosden of our Enforcement and Compliance Division at 447-1983.

Sincerely,


H. Joe Selby
Deputy Comptroller
for Operations

cc: Michael Doman - Region 11
John G. Hensel - Region 6



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Treasury - 556



Comptroller of the Currency
Administrator of National Banks

Washington, D.C. 20219

Official Business Penalty for Private Use \$300

7 8 1 1 3
SEP 5 11:18
Federal Election Commission
Attention: Mr. Brad Litchfield
1325 K Street, N.W.
Washington, D. C. 20463



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 707

