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March 23, 2000

VIA CERTIFIED MAIL

Federal Election Commission
999 East E Street, NW
Washington, D.C. 20463

Attention: Office of General Counsel

Re: **RESPONSE TO FEDERAL ELECTION COMMISSION COMPLAINT**
MUR NUMBER 4984
Our File No. P-00-2022

Dear Sir:

Please be advised that this office is general counsel for Godwin Developments, Inc. d/b/a **Marion Oaks Golf Club** and has been designated as legal counsel to respond to the above-referenced Complaint (MUR 4984). I have enclosed the Statement of Designation of Counsel for your reference. Godwin Developments, Inc. d/b/a **Marion Oaks Golf Club** has not violated any provisions of the Federal Election Campaign Act of 1971, as amended. On behalf of Godwin Developments, Inc. d/b/a Marion Oaks Golf Club, I can respond to the Complaint as follows:

- A. **FACTS.** Godwin Developments, Inc. d/b/a Marion Oaks Golf Club, operates a restaurant facility from its business premises located at 2255 Pinckney Road, Howell, Michigan. Prior to July 26, 1999, Godwin Developments, Inc. d/b/a Marion Oaks Golf Club was engaged by Doug Seabolt to provide a breakfast buffet for 21 persons. A meeting room was reserved for the breakfast buffet. On July 26, 1999, the staff of Marion Oaks provided food and beverage services for those persons attending the breakfast buffet. The invoice for the breakfast buffet in the amount of \$294.00 was delivered to Doug Seabolt. A copy of the invoice (0002626-IN) is enclosed. On or about August 26, 1999, Godwin Developments, Inc. d/b/a Marion Oaks Golf Club received a personal check from Doug Seabolt in the amount of \$294.00 as full payment of the invoice. A copy of the Godwin Developments, Inc. d/b/a Marion Oaks Golf Club deposit

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL COUNSEL
MAR 27 3 43 PM '00

6150 520 61 12

slip to NBD Bank dated August 26, 1999, itemizing the receipt of the payment of Doug Seabolt in the amount of \$294.00 is also enclosed.

Godwin Developments, Inc. d/b/a Marion Oaks Golf Club did not make any contributions to the Michael J. Rogers campaign, but only provided food and beverage services paid by Doug Seabolt.

I ask that any and all future communication pertaining to this matter be directed to this office as authorized by the Statement of Designation of Counsel. There is no reason to believe that the Complaint sets forth a possible violation of the Federal Election Campaign Act of 1971, as amended, and the file should be closed. I respectfully request that notice of closure of the file be issued by the Commission and provided to this office.

If you have any questions, comments or need for further documents, please do not hesitate to contact this office.

Sincerely,

BURCHFIELD, PARK & HEDDON



David L. Park

DLP/maf

Enclosures

cc: Godwin Developments, Inc. d/b/a Marion Oaks Golf Club

21-19-025-0320

*****INVOICE*****

MARION OAKS GOLF CLUB
2255 PINCKNEY ROAD
HOWELL, MI 48843

(517) 548-0050

DOUG SEABOLT
C/O 700 N WASHINGTON AVE
LANSING, MI 48906

CONTACT:

INVOICE: 0002626-IN

DATE: 7/26/99

DUE DATE: 8/26/99

CUST #: DSEABOLT

DESCRIPTION	QUANTITY	PRICE	AMOUNT
BREAKFAST BUFFET	21	11.47	240.87
ROOM CHARGE			00.00
SVCCHG			38.68

A FINANCE CHARGE OF 1.50% WILL BE
ADDED TO ALL INVOICES 30 DAYS PAST DUE.

NET INVOICE : 279.55
FREIGHT: 00.00
SALES TAX: 14.45

INVOICE TOTAL: 294.00

21.19.025.0321

21 19 025 0322

DEPOSIT RECORD COPY 9-32/720

GUYIN DEVELOPMENT, INC.
A MARION OAKS GOLF CLUB

NBD Bank
Howell Office - 599
Howell, Michigan 48843

DATE 8.26.1999

CR132
D1132

DEPOSITS MAY NOT BE AVAILABLE FOR IMMEDIATE WITHDRAWAL

CURRENCY	DOLLARS	CENTS
(NONE)		
CHECKS LIST EACH SEPARATELY		
Heather Rich	150	00
Carolyn Forkent	150	00
BANK OF AMERICA	150	50
Patette		
Heller	213	76
Bar Buckley	312	64
St. of MI	352	00
WV COBANK	155	73
Cornerstone		
ADICS		
6-15	538	90
BOGS		
Seabolt	294	00
Andy Nussle	235	17
R. Musitch	270	95
BADGER		
COACLES	410	00
TOTAL FROM OTHER SIDE OR ATTACHED LIST		
PLEASE REENTER TOTAL HERE	3231 65	

2612
2611

2626

923165

Checks and other items are received for deposit subject to the provisions of the Uniform Commercial Code or any applicable collection agreement

STATEMENT OF DESIGNATION OF COUNSEL

MOR 4984

NAME OF COUNSEL: DAVID L. PARK

ADDRESS: BURCHFIELD, PARK + HEDDON
225 E GRAND RIVER
BRIGHTON, MI 48116

TELEPHONE: 810 227-3100

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

3-15-00
Date

Franklin E. Godwin
Signature

RESPONDENT'S NAME: FRANKLIN E. GODWIN

ADDRESS: 5280 KIERSTAN
BRIGHTON, MI 48114

HOME PHONE: _____

BUSINESS PHONE: 517 5248 5181 X12

2025 FEB 14 11