



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1904

Date Filmed 9/23/86 Camera No. --- 2

Cameraman AS

86040613576

FEDERAL ELECTION COMMISSION

Routing cards & slips; Conciliation Reports;

Conciliation correspondence

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):

☐ (1) Classified Information

☐ (6) Personal privacy

☒ (2) Internal rules and practices

☐ (7) Investigatory files

☒ (3) Exempted by other statute

☐ (8) Banking Information

☐ (4) Trade secrets and commercial or financial information

☐ (9) Well Information (geographic or geophysical)

☒ (5) Internal Documents

Signed

George S. Brown, Jr.

date

8-7-86

FEC 9-21-77

86040513577

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Creative Display, Inc.)

PAC-ONE)

Beth N. Jackson, as treasurer)

Lewis Manderson, Jr.)

MUR 1904

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 25, 1986, the Commission decided by a vote of 6-0 to take the following actions in MUR 1904:

1. Accept the proposed conciliation agreement with Creative Display, Inc. PAC-ONE and Beth N. Jackson, as treasurer, and Lewis Manderson, Jr., as recommended in the General Counsel's Report signed July 21, 1986.
2. Approve the proposed letter, as recommended in the General Counsel's Report signed July 21, 1986.
3. Close the file.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively for this decision.

Attest:

7-25-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Wed.,	7-23-86,	10:41
Circulated on 48 hour tally basis:	Wed.,	7-23-86,	4:00
Deadline for vote:	Fri.,	7-25-86,	4:00

86040513578



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

perm
August 1, 1986

Maurice L. Shevin, Esquire
Sirote, Permutt, Friend, Friedman,
Held & Apolinski, P.C.
P.O. Box 55727
Birmingham, Alabama 35355

Re: MUR 1904
Creative Displays, Inc.
PAC-ONE and Beth N.
Jackson, as treasurer
Lewis Manderson, Jr.

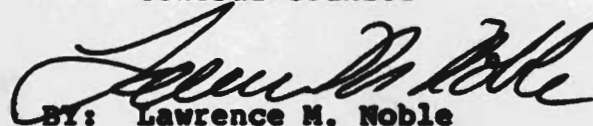
Dear Mr. Shevin:

On July 25, 1986, the Commission accepted the conciliation agreement signed by your clients in settlement of violations of 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3), and 2 U.S.C. § 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel


By: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

86040513579

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Creative Displays, Inc. PAC-ONE)

Beth N. Jackson, as treasurer)

Lewis Manderson, Jr.)

MUR 1904

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Lewis Manderson, Jr; and that Lewis Manderson, Jr. ("Manderson") violated 2 U.S.C. § 441a(a)(1)(C) and 2 U.S.C. § 441a(a)(3) by making excessive contributions to Creative Displays, Inc. PAC-ONE.

NOW, THEREFORE, the Commission, Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, and Manderson having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, and Manderson ("the Respondents"), and the subject matter of this proceeding.

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

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Respondent Creative Displays, Inc. PAC-ONE ("PAC-ONE") is a political committee within the meaning of 2 U.S.C. § 431(4)(B).
2. Respondent Beth N. Jackson is the treasurer of PAC-ONE.
3. In 1984 Respondent Lewis Manderson, Jr., made contributions totalling \$41,560 to PAC-ONE for use in the general election.
4. 2 U.S.C. § 441a(a)(1)(C) states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.
5. 2 U.S.C. § 441a(a)(3) states that no person shall make contributions aggregating more than \$25,000 in any calendar year.
6. 2 U.S.C. § 441a(f) states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.
7. Respondents contend that the excessive contribution by Manderson and the acceptance thereof, was inadvertent and resulted from the inexperience of the Respondents.

V. The Respondents acknowledge that:

86040513581

1. Respondents PAC-ONE and Beth N. Jackson, as treasurer, accepted contributions of \$41,560 from Lewis Manderson, Jr. The contributions from Manderson were in excess of contribution limitations by \$36,560 and in violation of 2 U.S.C. § 441a(f).

2. Respondent Manderson's contribution of \$41,560 to PAC-ONE was in excess of the contribution limitation by \$36,560 and in violation of 2 U.S.C. § 441a(a)(1)(C).

3. Respondent Manderson's contribution of \$41,560 to PAC-ONE was in excess of the aggregate contribution limitation by \$16,560 and in violation of 2 U.S.C. § 441a(a)(3).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of five thousand five hundred (\$5,500) pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

VIII. This agreement shall become effective as of this date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date of this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

86040513582

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY:

Lawrence M. Noble
Deputy General Counsel

Date

7/31/86

FOR THE RESPONDENTS:

Peggy B. Kracher Treasurer
MCH Management, Inc. PAC-ONE
F/K/A Creative Displays, Inc. PAC-ONE

July 3, 1986

86040513583

LAW OFFICES OF
SIROTE, PERMUTT, FRIEND, FRIEDMAN, HELD & APOLINSKY, P. C.

2222 ARLINGTON AVENUE SOUTH

REPLY TO

POST OFFICE BOX 56727

BIRMINGHAM, ALABAMA 35255

TELECOPIER (205) 933-7008

TELEPHONE (205) 933-7111

ANNISTON, ALABAMA-1000 QUINTARD AVENUE 35601-505/237-4129
HUNTSVILLE, ALABAMA-100 WASHINGTON STREET 35891-505/535-1711
TUSCALOOSA, ALABAMA-500 LURLEEN WALLACE BLVD. 35401-505/335-7111

July 29, 1986

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

Re: MUR 1904
Creative Displays, Inc. PAC-ONE
and Beth N. Jackson, as Treasurer
Lewis Manderson, Jr.

Dear George:

I have not received back our copies of the
Conciliation Agreement. I trust that the Agreement was
acceptable to the Commission.

Please return two fully executed copies to me.

Thanking you in advance, I am,

Very truly yours,

Maurice L. Shevin
Maurice L. Shevin
FOR THE FIRM

MLS/ajm

9/92

SIROTE
JAMES L. PERMUTT
C. M. FRIEND, JR.
RABE S. FRIEDMAN
JACK E. HELD
HAROLD I. APOLINSKY
ROBERT S. RUBIN
JOSEPH S. BLUESTEIN
RICHARD CONN
J. MADON DAVIS
LOUIS H. BAYER
JAMES A. HARRIS, JR.
EDWARD M. FRIEND, III
DONALD A. SIDES
C. LEE REEVES
MARK H. FRIEDMAN
THOMAS H. BROWN
JERRY E. HELD
MAURICE L. DUBOIN
DAVID M. FOSLERIDGE
HELENA M. MATHEWS
P. THOMAS MADGE
JACK E. LEVY
STEVEN A. BRICHMAN
JOHN V. LEE
RICHARD F. LEHR
SUSAN B. MITCHELL
JOHN H. COOPER
GEORGE W. NEAL, JR.
JOHN P. TONG
JOHN R. CHILES
E. PAUL DAVIS
CAROL GRAY CALDWELL

JOE H. RITCH, MANAGING
ATTORNEY IN HUNTSVILLE

MAYER U. NEWFIELD
OF COUNSEL

JOSEPH W. BLACKBURN
OF COUNSEL

WILLIAM WEST, JR.
* ADMITTED TO PRACTICE IN ALABAMA
* ADMITTED TO PRACTICE IN GEORGIA
* ADMITTED TO PRACTICE IN TEXAS

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
AUG 1 1986

HE FEC
CCCH 1096
AUG 1 1986
6. 1096-47



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Maurice L. Shevin, Esquire
Sirote, Permutt, Friend, Friedman,
Held & Apolinski, P.C.
P.O. Box 55727
Birmingham, Alabama 35355

Re: MUR 1984
Creative Displays, Inc.
PAC-ONE and Meth N.
Jackson, as treasurer
Lewis Manderson, Jr.

Dear Mr. Shevin:

On , 1986, the Commission accepted the conciliation agreement signed by your clients in settlement of violations of 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3), and 2 U.S.C. § 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreement

GD
7/30/86
RM

86040613585

No 105PAY TO THE
ORDER OFFederal Election CommissionJune 19 1986\$ 5,500⁰⁰Five thousand five hundred andno¹⁰⁰

DOLLARS

THE FIRST NATIONAL BANK
OF TUNICA, MISSISSIPPI
Member FDIC

PAC-ONE

FOR

Civil penaltyPeggy B. Kracker

⑆062200709⑆ ⑆013 511 9⑆

MEMORANDUMTO: 0
6
0
2

Debra A. Reed

TO:

Judy Smith

FROM:

Judy Smith

FROM:

Debra A. Reed

CHECK NO. 105

(a copy of which is attached) RELATING

TO MUR

1904 (Demougeot)

AND NAME

Creative Displays, Inc. PAC-ONE,
and Beth N. Jackson, as Treasurer

WAS RECEIVED ON

7/11/86

PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ☒ /

BUDGET CLEARING ACCOUNT

(#95F3875.16)

/ /

CIVIL PENALTIES ACCOUNT

(#95-1099.160)

/ /

OTHER

SIGNATURE

Debra A. Reed

DATE

7/15/86

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Creative Displays, Inc. PAC-ONE
Beth N. Jackson, as treasurer
Lewis Manderson, Jr.

)
)
) MUR 1904
)
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of February 4, 1986, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1904:

1. Find probable cause to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).
2. Find probable cause to believe that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a) (1)(C) and 441a(a) (3).
3. Send the letter and conciliation agreement attached to the General Counsel's report dated January 24, 1986.

Commissioners Aikens, Elliott, Josefiak, McDonald, and McGarry voted affirmatively for the decision; Commissioner Harris was not present.

Attest:

3/4/86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

860406135887



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *AMB*
DATE: January 27, 1986
SUBJECT: MUR 1904 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of February 4, 1986

Open Session _____

Closed Session XXX

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []

24 Hour No Objection []
Sensitive []
Non-Sensitive []

Information []
Sensitive []
Non-Sensitive []

Other [kx]

For Agenda of 2-4-86

Circulate on blue paper.

Sensitive

DISTRIBUTION

Compliance [kx]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution below) []

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Creative Displays, Inc. PAC-ONE)

Beth N. Jackson, as treasurer)

Lewis Manderson, Jr.)

RECEIVED
FEB 04 1986
SENSITIVE

MUR 1904
2:37

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

FEB 04 1986

I. BACKGROUND

This matter was referred to the Office of the General Counsel by the Reports Analysis Division ("RAD"). The 1984 July Quarterly Report filed by Creative Displays, Inc. PAC-ONE ("PAC-ONE") disclosed a \$41,185 contribution from Lewis Manderson, Jr., on May 31, 1984. Based upon this information, a Request for Additional Information ("RAFI") was sent to PAC-ONE on October 31, 1984, which recommended that the amount in excess of the \$5,000 limit be refunded.

On November 9, 1984, PAC-ONE submitted a letter and a copy of two (2) refund checks dated November 6, 1984, to Mr. Manderson totalling \$36,560. One check was for a \$36,185 excessive contribution received in 1984, and the other check was for a \$375 excessive contribution received in 1983.

On February 27, 1985, the Commission found reason to believe that PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Lewis Manderson, Jr. Also on February 27, 1985, the Commission found reason to believe that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3) by making excessive contributions to that committee.

86040513589

II. LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A) states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3) states that no person shall make contributions aggregating more than \$25,000 in any calendar year.

2 U.S.C. § 441a(f) states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

Respondents do not contest the fact that Lewis Manderson made, and PAC-ONE accepted, contributions totalling \$36,560 in excess of statutory limits.

86040513590

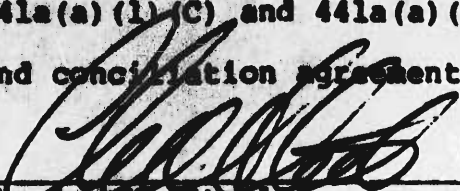
In view of this, the Office of General Counsel recommends that the Commission find probable cause to believe that the Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) and that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).
2. Find probable cause to believe that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).
3. Send the attached letter and conciliation agreement.

Date

24 January 1984


Charles N. Steele
General Counsel

Attachments

- I. Letter and conciliation agreements
- II. Brief from respondents

* Also, it is noted that PAC-ONE had total receipts of \$75,875 and total disbursements of \$15,200 for the 1983-1984 period.

86040613591



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

June 26, 1985

Maurice L. Shevin, Esquire
Sirote, Permutt, Friend, Friedman,
Held & Apolinski, P.C.
P.O. Box 55727
Birmingham, Alabama 35255

RE: MUR 1904
Creative Displays, Inc. PAC-ONE
and Beth N. Jackson, as treasurer
Lewis Manderson, Jr.

Dear Mr. Shevin:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on February 27, 1985, found reason to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, had violated 2 U.S.C. § 441a(f), and that Lewis Manderson, Jr. had violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

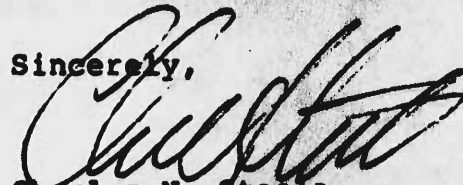
86040513592

Letter to Maurice L. Shevin, Esquire
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact George Demougeot, the staff member assigned to handle this matter, at (202) 523-4000.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

86040413593

86040513594

100

MUR 1904

On February 27, 1985, the Commission found reason to believe that PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Lewis Manderson, Jr. Also on February 27, 1985, the Commission found reason to believe that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

II. Legal Analysis

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3), states that no person shall make contributions aggregating more than \$25,000 in any calendar year.

2 U.S.C. § 441a(f), states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

In response to the reason to believe notification, the respondents have requested that the Commission take no further action in this matter. The request is based upon the fact that PAC-ONE, once contacted by RAD concerning the excessive contributions, promptly sent two refund checks to Mr. Manderson.

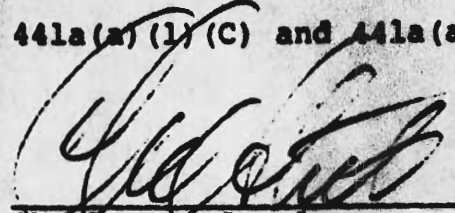
Notwithstanding PAC-ONE's prompt refund of the contributions, the fact remains that Mr. Manderson's two contributions exceeded statutory limits by \$36,560. In view of this, the Office of General Counsel recommends that the Commission find probable cause to believe that the creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) and that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

86040513595

III. General Counsel's Recommendation(s)

1. Find probable cause to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).
2. Find probable cause to believe that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

21 Jan 1965
Date


Charles N. Steele
General Counsel

86040613596



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel
DATE: June 24, 1985
SUBJECT: MUR 1904 - Memorandum to the Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote	[]
Sensitive	[]
Non-Sensitive	[]
24 Hour No Objection	[]
Sensitive	[]
Non-Sensitive	[]
Information	[X]
Sensitive	[X]
Non-Sensitive	[]

Other []

DISTRIBUTION

Compliance	[X]
Audit Matters	[]
Litigation	[]
Closed MUR Letters	[]
Status Sheets	[]
Advisory Opinions	[]

Other (see distribution below) []

86040613597



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

85 JUN 24 P 2: 50

June 24, 1985

CONFIDENTIAL

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CS*

SUBJECT: MUR #1904

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on June 24, 1985. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

- I. Brief
- II. Letter to Respondent
- III. Letter from Respondent

36040613598

II. Legal Analysis

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3), states that no person shall make contributions aggregating more than \$25,000 in any calendar year.

2 U.S.C. § 441a(f), states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

In response to the reason to believe notification, the respondents have requested that the Commission take no further action in this matter. The request is based upon the fact that PAC-ONE, once contacted by RAD concerning the excessive contributions, promptly sent two refund checks to Mr. Manderson.

Notwithstanding PAC-ONE's prompt refund of the contributions, the fact remains that Mr. Manderson's two contributions exceeded statutory limits by \$36,560. In view of this, the Office of General Counsel recommends that the Commission find probable cause to believe that the creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) and that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

Attachment I
(2)

86040513600

III. General Counsel's Recommendation(s)

1. Find probable cause to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).
2. Find probable cause to believe that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

Date _____

Charles N. Steele
General Counsel

86040613601

Attachment I

(3)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Maurice L. Shevin, Esquire
Sirote, Permutt, Friend, Friedman,
Held & Apolinski, P.C.
P.O. Box 55727
Birmingham, Alabama 35255

RE: MUR 1904
Creative Displays, Inc. PAC-ONE
and Beth N. Jackson, as treasurer
Lewis Manderson, Jr.

Dear Mr. Shevin:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on February 27, 1985, found reason to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, had violated 2 U.S.C. § 441a(f), and that Lewis Manderson, Jr. had violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

Attachment II
(4)

86040513602

Letter to Maurice L. Shevin, Esquire
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact George Demougeot, the staff member assigned to handle this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

86040413603

Attachment II
(5)

LAW OFFICE
SIROTE, PERMUTT, FRIEND, FRIEDMAN, HELD & APOLINSKY, P. C.
2222 ARLINGTON AVENUE SOUTH
BIRMINGHAM, ALABAMA 35255
205/933-7111

ANNISTON, ALABAMA-1000 QUINTARD AVENUE 38202-205/237-4120
HUNTSVILLE, ALABAMA-71 WASHINGTON SQUARE 35801-205/530-1711
TUSCALOOSA, ALABAMA-2330 UNIVERSITY BLVD. 35401-205/330-7111

April 3, 1985

Mr. George Demougeot
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1904; Lewis M. Manderson, Jr.
6052 Shoreline Towers East Condominiums
Destin, Florida 32541

Dear Mr. Demougeot:

This letter follows my letter to you dated April 1, 1985, concerning my representation of Creative Displays, Inc. PAC-ONE. Please be advised that I also represent Lewis M. Manderson, Jr. You will find enclosed with this letter the Statement of Designation of Counsel.

I believe that my letter of April 1, 1985 adequately explains the circumstances surrounding Mr. Manderson's contribution to Creative Displays, Inc. PAC-ONE. We have complied with all of the requests of the Federal Election Commission. We request that you consider this matter concluded. If you have any questions or requests of us, please let me know.

Very truly yours,

Maurice L. Shevin
Maurice L. Shevin
FOR THE FIRM

MLS/bb

Enclosure

cc: Mr. Lewis M. Manderson, Jr.
Ms. Ruth G. Brown
Richard Cohn, Esquire

SIROTE
JAMES L. PERMUTT
E.M. FRIEND, JR.
EARL S. FRIEDMAN
JACK E. HELD
HAROLD I. APOLINSKY
ROBERT S. RUBIN
JOSEPH S. BLUESTEIN
RICHARD COHN
J. MARSH DAVIS
LOUIS H. BAYER
JAMES H. HARRIS, JR.
EDWARD H. FRIEND, III
DONALD J. SIDES
C. LEE REEVES
MARR H. FRIEDMAN
ALLAN J. CHAPPELLE
THOMAS H. BROWN
JERRY E. HELD
MAURICE L. SHEVIN
DAVID H. WOOLDRIDGE
HELEN M. MATHEWS
F. TIMOTHY MACE
JACK E. LEVY
STEVEN A. BRIGMAN
JOHN V. LEE
RICHARD L. LEHR
RUSAN E. MITCHELL
JOHN G. COOPER
GEORGE H. NEAL, JR.
JUDITH F. TORD

JOHN R. CHILES
C. PAUL DAVIS
CAROL A. FOLEY
DAVID S. FOLEY
CHARLES S. TRIGGARS
KATE A. MOUSER
ANDREA L. WITMER
B. SCOTT MCLAM
DAVID A. MIDDLEBROOKS
RICHARD E. NEAL
JOAN C. RASDALE
TIMOTHY A. BIRCH

JOE H. RITCH, MANAGING
ATTORNEY IN HUNTSVILLE
MAYER U. NEWFIELD
OF COUNSEL IN BIRMINGHAM

ROBERT E. FRALEY
OF COUNSEL IN ORLANDO, FL.

JOHN G. WEST, JR.
1922-1978

85 APR 8 A8:51
AIO:51
OFFICE OF THE
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

Attachment III
(6)

LAW OFFICE OF
SIROTE, PERMUTT, FRIEND, FRIEDMAN, HELD & APOLINSKY, P.C.

2222 ARLINGTON AVENUE SOUTH

REPLY TO

POST OFFICE BOX 55727

BIRMINGHAM, ALABAMA 35255

205/933-7111

ANNISTON, ALABAMA-1000 QUINTARD AVENUE 35202-205/237-4189
HUNTSVILLE, ALABAMA-71 WASHINGTON SQUARE 35801-205/536-1711
TUSCALOOSA, ALABAMA-2330 UNIVERSITY BLVD. 35401-205/339-7111

SIROTE
PERMUTT
FRIEND, JR.
FRIEDMAN
HELD
APOLINSKY
ROBERT S. HUGHES
JOSEPH S. BLUESTEIN
RICHARD COHN
J. NASHON DAVIS
LOUIS H. BAYER
JAMES A. HARRIS, JR.
EDWARD M. FRIEND, III
EDWARD J. SIDES
G. LEE REEVES
MARK H. FRIEDMAN
ALLAN J. CHAPPELLE
THOMAS H. BROWN
JERRY S. HELD
MAURICE L. SHEVIN
DAVID H. WOOLBRIDGE
HELENA M. HATHAWAY
T. TIMOTHY HAGES
JACK S. LEVY
STEVEN A. BRICKMAN
JOHN V. LEE
RICHARD L. LEMR
SUSAN S. MITCHELL
JOHN H. COOPER
GEORGE H. NEAL, JR.
JUDITH R. TODD

Demougeot
JOHN R. CHILES
C. PAUL DAVIS
JOHN S. ALLEN
CHARLES R. DRISCOLL
KATE A. HOUSE
ANDREA L. WITCHEE
D. SCOTT MCLEIN
DAVID J. H. DOLESPHORS
RICHARD S. NEAL
JOAN C. RASSELL
TIMOTHY A. BUSH

JOE H. RYAN, MANAGING
ATTORNEY IN HUNTSVILLE
MAYER U. NEWFIELD
OF COUNSEL IN BIRMINGHAM
ROBERT E. FRALEY
OF COUNSEL IN ORLANDO, FL.

WILLIAM D. WEST, JR.
1982-1978

April 1, 1985

Mr. George Demougeot
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1904; Creative Displays, Inc. PAC-ONE

Dear Mr. Demougeot:

The undersigned and this law firm have the privilege of representing Creative Displays, Inc. PAC-ONE. Please find enclosed the Statement of Designation of Counsel, signed by Ms. Brown, Assistant Treasurer for my client, and dated March 27, 1985.

I would like to take this opportunity to discuss the merits of your March 5, 1985 letter addressed to Beth N. Jackson, Treasurer.

Michael Butterfield, Reports Analyst Division, made us aware of the excessive contribution made by Mr. Manderson, in letters dated October 31, 1984 and November 2, 1984. Based upon those letters, my client responded with a letter dated November 6, 1984 to Mr. Butterfield stating that the excessive amount of \$36,560.00 had been refunded to Mr. Manderson by check numbers 75 and 76. Ms. Brown, Assistant Treasurer, enclosed copies of those checks in the letter to Mr. Butterfield. Further, on Post General Report for the period October 18, 1984 through November 26, 1984, Ms. Brown indicated the refund on line 27. This report was dated and mailed November 27, 1984. We had thought the matter was concluded until we received the letter from Mr. McGarry, Chairman, on March 5, 1985.

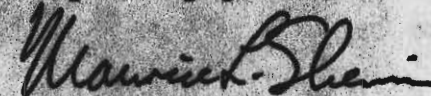
I am not certain what further information or steps which you need to go through in order to consider this matter to have been

Attachment III
(7)

Mr. George Demougeot
Page Two
April 1, 1985

concluded. Please let me know if any additional information is
needed. Thanking you in advance, I am,

Very truly yours,



Maurice L. Shevin
FOR THE FIRM

MLS:bb

Enclosure

cc: Ms. Ruth G. Brown, Assistant Treasurer

860403.13606

Attachment III
(8)



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Maurice L. Shevin, Esquire
Sirote, Permutt, Friend, Friedman,
Held & Apolinski, P.C.
P.O. Box 55727
Birmingham, Alabama 35255

RE: MUR 1904
Creative Displays, Inc. PAC-ONE
and Beth N. Jackson, as treasurer
Lewis Manderson, Jr.

Dear Mr. Shevin:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your clients the Federal Election Commission, on February 27, 1985, found reason to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, had violated 2 U.S.C. § 441a(f), and that Lewis Manderson, Jr. had violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

86040513607

Letter to Maurice L. Shevin, Esquire
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact George Demougeot, the staff member assigned to handle this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

86040513608

86040513609

)
)
)
)
)
)

MUR 1904

On February 27, 1985, the Commission found reason to believe that PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Lewis Manderson, Jr. Also on February 27, 1985, the Commission found reason to believe that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

II. Legal Analysis

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3), states that no person shall make contributions aggregating more than \$25,000 in any calendar year.

2 U.S.C. § 441a(f), states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

In response to the reason to believe notification, the respondents have requested that the Commission take no further action in this matter. The request is based upon the fact that PAC-ONE, once contacted by RAD concerning the excessive contributions, promptly sent two refund checks to Mr. Manderson.

Notwithstanding PAC-ONE's prompt refund of the contributions, the fact remains that Mr. Manderson's two contributions exceeded statutory limits by \$36,560. In view of this, the Office of General Counsel recommends that the Commission find probable cause to believe that the creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) and that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

86040613610

III. General Counsel's Recommendation(s)

1. Find probable cause to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).
2. Find probable cause to believe that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

Date

Charles N. Steele
General Counsel

86040513611



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES N. STEELE
GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE:

MAY 9, 1985

SUBJECT:

**MUR 1904 - Comprehensive Investigative
Report #1 signed May 7, 1985**

The above-captioned matter was circulated to the Commission on a 24 hour no-objection basis at 4:00, May 7, 1985.

There were no objections to the Comprehensive Investigative Report at the time of the deadline.

86040513612



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: May 7, 1985
SUBJECT: MUR 1904 - Comprehensive Investigative Report #1

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []
24 Hour No Objection [X]
Sensitive [X]
Non-Sensitive []
Information []
Sensitive []
Non-Sensitive []
Other []

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

86040513613

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of

Creative Displays, Inc. PAC-ONE
Beth N. Jackson, as treasurer
Lewis Manderson, Jr.

MUR 1904

85 MAY 7 A 8:38

SENSITIVE

COMPREHENSIVE INVESTIGATIVE REPORT #1

This matter was referred to the Office of General Counsel by the Reports Analysis Division ("RAD"). On February 27, 1985, the Commission found reason to believe that Creative Displays, Inc. PAC-ONE ("PAC-ONE") and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) by accepting excessive contributions from Lewis Manderson, Jr. Also on February 27, 1985, the Commission found reason to believe that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3). On March 5, 1985, notification letters were mailed to respondents.

On April 5, 1985, respondents requested that the Commission take no further action in this matter. This request was based upon the fact that PAC-ONE, once contacted by RAD concerning the excessive contributions, promptly sent two refund checks to Mr. Manderson.

Briefs are being prepared and should be forwarded to the Commission shortly.

Charles N. Steele
General Counsel

May 6, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

86040513614

LAWS OFFICES OF
SIROTE, PERMUTT, FRIEND, FRIEDMAN, HELD & APOLINSKY, P. C.

2222 ARLINGTON AVENUE SOUTH

REPLY TO

POST OFFICE BOX 55727

BIRMINGHAM, ALABAMA 35255

205/833-7111

ANNISTON, ALABAMA-1000 QUINTARD AVENUE 36205-205/837-4150
HUNTSVILLE, ALABAMA-41 WASHINGTON SQUARE 35801-205/535-1711
TUSCALOOSA, ALABAMA-2350 UNIVERSITY BLVD. 35401-205/339-7111

April 3, 1985

Mr. George Demougeot
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1904; Lewis M. Manderson, Jr.
6052 Shoreline Towers East Condominiums
Destin, Florida 32541

Dear Mr. Demougeot:

This letter follows my letter to you dated April 1, 1985, concerning my representation of Creative Displays, Inc. PAC-ONE. Please be advised that I also represent Lewis M. Manderson, Jr. You will find enclosed with this letter the Statement of Designation of Counsel.

I believe that my letter of April 1, 1985 adequately explains the circumstances surrounding Mr. Manderson's contribution to Creative Displays, Inc. PAC-ONE. We have complied with all of the requests of the Federal Election Commission. We request that you consider this matter concluded. If you have any questions or requests of us, please let me know.

Very truly yours,

Maurice L. Shevin
Maurice L. Shevin
FOR THE FIRM

MLS/bb

Enclosure

cc: Mr. Lewis M. Manderson, Jr.
Ms. Ruth G. Brown
Richard Cohn, Esquire

GCC 7084

RECEIVED AT THE FEO

MORRIS S. SIROTE
JAMES L. PERMUTT
E. M. FRIEND, JR.
CARL S. FRIEDMAN
JACK E. HELD
HAROLD I. APOLINSKY
ROBERT S. RUBIN
JOSEPH S. BLUESTEIN
RICHARD COHN
J. NASHON DAVIS
LOUIS H. BAYER
JAMES A. HARRIS, JR.
EDWARD M. FRIEND, III
DONALD J. SIDES
C. LEE REEVE
MARK H. FRIEDMAN
ALLAN J. CHAPPELLE
THOMAS H. BROWN
JERRY E. HELD
MAURICE L. SHEVIN
DAVID M. WOOLBRIDGE
MELINDA M. MATTHEWS
F. TIMOTHY HARRIS
JACK B. LEVY
STEVEN A. BRICKMAN
JOHN V. LEE
RICHARD I. LEHR
SUSAN B. MITCHELL
JOHN M. COOPER
GEORGE H. NEAL, JR.
JUDITH F. TODD

JOHN R. CHILES
C. PAUL DAVIS
CARL M. CALDWELL
DAVID E. STONE
CHARLES R. BRIGGS
NATE R. HOUSER
ANDREA L. WITCHER
D. SCOTT MELAIN
DAVID J. MIDDLEBROOKS
RICHARD E. NEAL
JOHN C. RAGSDALE
TIMOTHY A. BURN

JOE H. RITCH, MANAGING
ATTORNEY IN HUNTSVILLE
MAYER U. NEWFIELD
OF COUNSEL IN BIRMINGHAM

ROBERT E. FRALEY
OF COUNSEL IN ORLANDO, FL

JOHN E. WEST

1985-1975

RECEIVED
GENERAL COUNSEL
APR 10 1985
NO: 51

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1904

NAME OF COUNSEL: Maurice L. Shevin, Esq.

ADDRESS: Sirote, Permutt, Friend, Friedman, Held & Apollinsky

2222 Arlington Avenue South, PO Box 55727

Birmingham, Alabama 35255

TELEPHONE: 205-933-7111

REC-
GENERAL COUNSEL
APR 8
AIO: ST

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.

April 1, 1985
Date


Signature

RESPONDENT'S NAME: Lewis M. Manderson, Jr.

ADDRESS: 6052 Shoreline Towers E. Condo

Destin, Florida 32541

HOME PHONE: 904-837-7646

BUSINESS PHONE: 205-345-6141

86040513616

LAW OFFICES OF

ROTE, PERMUTT, FRIEND, FRIEDMAN, HELD & APOLINSKY, P. C.

2222 ARLINGTON AVENUE SOUTH

POST OFFICE BOX 55727

BIRMINGHAM, ALABAMA 35255



Mr. George Demougeot
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

040513617

85 APR 8 10:48



LAW OFFICES OF
SIROTE, PERMUTT, FRIEND, FRIEDMAN, HELD & APOLINSKY, P.C.

2222 ARLINGTON AVENUE SOUTH

REPLY TO

POST OFFICE BOX 88727

BIRMINGHAM, ALABAMA 35255

205/833-7111

ANNISTON, ALABAMA-1000 QUINTARD AVENUE 36208-205/837-4189
HUNTSVILLE, ALABAMA-91 WASHINGTON SQUARE 35891-205/836-1711
TUSCALOOSA, ALABAMA-2330 UNIVERSITY BLVD. 35401-205/338-7111

MORRIS R. SIROTE
JAMES L. PERMUTT
E.M. FRIEND, JR.
KARL S. FRIEDMAN
JACK E. HELD
HAROLD I. APOLINSKY
ROBERT S. FUSCH
JOSEPH S. BLUESTEIN
RICHARD CONN
J. NASH DAVIS
LOUIS N. BAYER
JAMES A. HARRIS, JR.
EDWARD M. FRIEND, II
DONALD J. SIDER
G. LEE REEVES
MARK H. FRIEDMAN
ALLAN J. CHAPPELLE
THOMAS H. BROWN
JERRY E. HELD
MAURICE L. SHEVIN
DAVID M. WOODBRIDGE
MELINDA M. MATHEWS
P. TIMOTHY NABES
JACK B. LEVY
STEVEN A. BRICKMAN
JOHN V. LEE
RICHARD I. LEHR
RUSAN E. MITCHELL
JOHN H. CROPER
GEORGE H. NEAL, JR.
JUDITH F. TODD

JOHN R. CHILES
C. PAUL BARKER
CHARLES R. BRIDGERS
KATE K. HOUSER
ANDREA L. WITCHER
D. SCOTT MCLAIN
DAVID J. NIDDLEBROOKS
RICHARD E. NEAL
JOAN C. RAGSDALE
TIMOTHY A. BUSH

JOE H. WITCH, MANAGING
ATTORNEY IN HUNTSVILLE

MATTHEW J. NEWFIELD
OF COUNSEL IN BIRMINGHAM

ROBERT E. FRALY
OF COUNSEL IN ORLANDO, FL

WILLIAM S. WEST, JR.
1922-1978

April 1, 1985

Mr. George Demougeot
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1904; Creative Displays, Inc. PAC-ONE

Dear Mr. Demougeot:

The undersigned and this law firm have the privilege of representing Creative Displays, Inc. PAC-ONE. Please find enclosed the Statement of Designation of Counsel, signed by Ms. Brown, Assistant Treasurer for my client, and dated March 27, 1985.

I would like to take this opportunity to discuss the merits of your March 5, 1985 letter addressed to Beth N. Jackson, Treasurer.

Michael Butterfield, Reports Analyst Division, made us aware of the excessive contribution made by Mr. Manderson, in letters dated October 31, 1984 and November 2, 1984. Based upon those letters, my client responded with a letter dated November 6, 1984 to Mr. Butterfield stating that the excessive amount of \$36,560.00 had been refunded to Mr. Manderson by check numbers 75 and 76. Ms. Brown, Assistant Treasurer, enclosed copies of those checks in the letter to Mr. Butterfield. Further, on Post General Report for the period October 18, 1984 through November 26, 1984, Ms. Brown indicated the refund on line 27. This report was dated and mailed November 27, 1984. We had thought the matter was concluded until we received the letter from Mr. McGarry, Chairman, on March 5, 1985.

I am not certain what further information or steps which you need to go through in order to consider this matter to have been

86040313618

Mr. George Demougeot
Page Two
April 1, 1985

concluded. Please let me know if any additional information is needed. Thanking you in advance, I am,

Very truly yours,



Maurice L. Shevin
FOR THE FIRM

MLS:bb

Enclosure

cc: Ms. Ruth G. Brown, Assistant Treasurer

86040513619

STATEMENT OF DESIGNATION OF COUNSEL

MUR 1904

NAME OF COUNSEL: Maurice L. Shevin, Esq.

ADDRESS: Sirote, Permutt, Friend, Friedman, Held & Apolinsky
2222 Arlington Avenue South, P.O. Box 55727
Birmingham, Alabama 35255

TELEPHONE: (205) 933-7111

--- 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.

March 27, 1985
Date

A. R. Brown
Signature *Ash. Brown*

RESPONDENT'S NAME: Creative Displays, Inc.

ADDRESS: PAC-ONE
P.O. Box 2389
2330 University Boulevard, 9th Floor
Tuscaloosa, Alabama 35403

HOME PHONE: _____

BUSINESS PHONE: (205) 345-6141

860406136620

OTE, PERMUTT, FRIEND, FRIEDMAN, HELD & APOLINSKY, P. C.

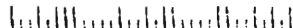
POST OFFICE BOX 55727

BIRMINGHAM, ALABAMA 35255

Mr. George Demougeot
General Counsel's Office
Federal Election Commission
Washington, D.C. 20463

85 APR 5

AS



800 46942
RECEIVED AT THE FED

85 MAR 21 AM 48:52

March 18, 1985

MGH

Management, Inc.

POST OFFICE BOX 2388 • TUSCALOOSA, ALABAMA 35403-2389 • TELEPHONE 205/345-6141

Mr. George Demougeot
General Counsel's Office
Federal Election Commission
Washington, D. C. 20463

RE: MUR 1904

Dear Mr. Demougeot:

As per our telephone conversation of this date, I am confirming that John Warren McGarry's letter to Beth W. Jackson, Treasurer Creative Displays, Inc. PAC-ONE dated March 5, 1985 was just opened this date. Since she is no longer employed here, this letter was in a stack of mail that arrived while I was out of the office last week.

Therefore, we are assuming that a reply within ten days of this date (March 18, 1985) will be satisfactory with your office.

Sincerely,



Ruth G. Brown

rgb

86040513622

AGH

Management, Inc.

P.O. BOX 2389 • TUSCALOOSA, ALABAMA 35403-2389

040613623



18 MAR 1985

Mr. George Demougeot
General Counsel's Office
Federal Election Commission
Washington, D. C. 20453

05 MAR 21 AG:5

RECEIVED
OFFICE OF THE FEC
COMMISSIONER SECRETARY

 FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

85 MAR 4 11:47

March 4, 1985

SENSITIVE

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel *KAG*
SUBJECT: RAD Referral 84L-34

On February 27, 1985 the Commission approved the recommendation that RAD Referral 84L-34 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 84L-34 should now become MUR 1904.

Attachment
Copy of Certification

3300A0313



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

85 MAR 4 AM : 47

March 4, 1985

SENSITIVE

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel
By: Kenneth A. Gross
Associate General Counsel *KAG*
SUBJECT: RAD Referral 84L-34

On February 27, 1985 the Commission approved the recommendation that RAD Referral 84L-34 should become a MUR. Therefore, all documents which had previously been contained in RAD Referral 84L-34 should now become MUR 1904.

Attachment
Copy of Certification

8604051362

BEFORE THE FEDERAL ELECTION COMMISSION

M 1904

In the Matter of

Creative Displays, Inc. PAC-ONE
Beth N. Jackson, Treasurer
Lewis Manderson, Jr.

RAD Referral 84L-34

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 27, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 84L-34:

1. Open a MUR.
2. Find reason to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Lewis Manderson, Jr., violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).
4. Approve the letter and General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed February 22, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

2-27-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

2-22-85, 4:07
2-25-85, 11:00

86040513626

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Creative Displays, Inc. PAC-ONE
Beth N. Jackson, Treasurer
Lewis Manderson, Jr.

)
) RAD Referral 84L-34
)
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 27, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 84L-34:

1. Open a MUR.
2. Find reason to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Lewis Manderson, Jr., violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).
4. Approve the letter and General Counsel's Factual and Legal Analysis attached to the First General Counsel's Report signed February 22, 1985.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

2-27-85

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:

2-22-85, 4:07
2-25-85, 11:00

86040513627



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1985

Lewis M. Manderson, Jr.
6052 Shoreline Towers E. Condo
Destin, Florida 32541

RE: MUR 1904

Dear Mr. Manderson:

On February 27, 1985, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

86040513628

Lewis M. Manderson, Jr.
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

86040613629

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1904

RESPONDENT: Lewis Manderson, Jr.

SUMMARY OF ALLEGATIONS

The 1984 July Quarterly Report filed by Creative Displays, Inc. PAC-ONE ("PAC-ONE") disclosed a \$41,185 contribution from Lewis Manderson, Jr., on May 31, 1984. Based upon this information, a Request for Additional Information ("RFAI") was sent to PAC-ONE on October 31, 1984, which recommended that the amount in excess of the \$5,000 limit be refunded.

On November 9, 1984, PAC-ONE submitted a letter and a copy of two (2) refund checks dated November 6, 1984, to Mr. Manderson totalling \$36,560. One check was for a \$36,185 excessive contribution received in 1984, and the other check was for a \$375 excessive contribution received in 1983.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3), states that no person shall make contribution aggregating more the \$25,000 in any calendar year.

2 U.S.C. § 441a(f), states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

86040513630

In view of the fact that the two contributions from Mr. Manderson exceeded the contribution limitation by \$36,560, the Office of General Counsel recommends that the Commission find reason to believe that Lewis Manderson, Jr., violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

86040513631



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1985

Beth N. Jackson, Treasurer
Creative Displays, Inc. PAC-ONE
P.O. Box 2389
2330 University Boulevard, 9th Floor
Tuscaloosa, Alabama 35403

RE: MUR 1904

Dear Ms. Jackson:

On February 27, 1985, the Federal Election Commission determined that there is reason to believe Creative Displays, Inc. PAC-ONE and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

86040513632

Beth N. Jackson, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

86040313633

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. 1904

RESPONDENTS: Creative Displays, Inc. PAC-ONE
Beth M. Jackson, Treasurer

SUMMARY OF ALLEGATIONS

The 1984 July Quarterly Report filed by Creative Displays, Inc. PAC-ONE ("PAC-ONE") disclosed a \$41,185 contribution from Lewis Manderson, Jr., on May 31, 1984. Based upon this information, a Request for Additional Information ("RFAI") was sent to PAC-ONE on October 31, 1984, which recommended that the amount in excess of the \$5,000 limit be refunded.

On November 9, 1984, PAC-ONE submitted a letter and a copy of two (2) refund checks dated November 6, 1984, to Mr. Manderson totalling \$36,560. One check was for a \$36,185 excessive contribution received in 1984, and the other check was for a \$375 excessive contribution received in 1983.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3), states that no person shall make contribution aggregating more the \$25,000 in any calendar year.

2 U.S.C. § 441a(f), states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

86040513634

In view of the fact that the two contributions from Mr. Manderson exceeded the contribution limitation by \$36,560, the Office of General Counsel recommends that the Commission find reason to believe that the Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).

86040613635



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Beth W. Jackson, Treasurer
Creative Displays, Inc. PAC-ONE
P.O. Box 2389
2330 University Boulevard, 9th Floor
Tuscaloosa, Alabama 35403

RE: MUR

Dear Ms. Jackson:

On , 1985, the Federal Election Commission determined that there is reason to believe Creative Displays, Inc. PAC-ONE and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

26040613636

Beth N. Jackson, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

86040613637

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENTS: Creative Displays, Inc. PAC-ONE
Beth N. Jackson, Treasurer

SUMMARY OF ALLEGATIONS

The 1984 July Quarterly Report filed by Creative Displays, Inc. PAC-ONE ("PAC-ONE") disclosed a \$41,185 contribution from Lewis Manderson, Jr., on May 31, 1984. Based upon this information, a Request for Additional Information ("RFAI") was sent to PAC-ONE on October 31, 1984, which recommended that the amount in excess of the \$5,000 limit be refunded.

On November 9, 1984, PAC-ONE submitted a letter and a copy of two (2) refund checks dated November 6, 1984, to Mr. Manderson totalling \$36,560. One check was for a \$36,185 excessive contribution received in 1984, and the other check was for a \$375 excessive contribution received in 1983.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3), states that no person shall make contribution aggregating more the \$25,000 in any calendar year.

2 U.S.C. § 441a(f), states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

86040513638

In view of the fact that the two contributions from Mr. Manderson exceeded the contribution limitation by \$36,560, the Office of General Counsel recommends that the Commission find reason to believe that the Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).

86040613639



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cut*
DATE: February 22, 1985
SUBJECT: RAD 84L-34: First General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote [X]
Sensitive [X]
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information []
Sensitive []
Non-Sensitive []
Other []

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

86040513640

SENSITIVE

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

05 FEB 22 P 4: 07

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

2/22/85-4:00

RAD 84L-34
STAFF MEMBER
George Denougeot

SOURCE OF MUR: **I N T E R N A L L Y G E N E R A T E D**

RESPONDENTS' NAME: Creative Displays, Inc. PAC - ONE
Beth N. Jackson, Treasurer
Lewis Manderson, Jr.

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

INTERNAL REPORTS CHECKED: Committee Reports

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The 1984 July Quarterly Report filed by Creative Displays, Inc. PAC-ONE ("PAC-ONE") disclosed a \$41,185 contribution from Lewis Manderson, Jr., on May 31, 1984. Based upon this information, a Request for Additional Information ("RFAI") was sent to PAC-ONE on October 31, 1984, which recommended that the amount in excess of the \$5,000 limit be refunded.

On November 9, 1984, PAC-ONE submitted a letter and a copy of two (2) refund checks dated November 6, 1984, to Mr. Manderson totalling \$36,560. One check was for a \$36,185 excessive contribution received in 1984, and the other check was for a \$375 excessive contribution received in 1983.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any multicandidate political committee in any

86040513641

calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3), states that no person shall make contribution aggregating more than \$25,000 in any calendar year.

2 U.S.C. § 441a(f), states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

In view of the fact that the two contributions from Mr. Manderson exceeded the contribution limitation by \$36,560, the Office of General Counsel recommends that the Commission find reason to believe that the Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f) and that Lewis Manderson, Jr. violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe that Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).
3. Find reason to believe that Lewis Manderson, Jr., violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3).

86040513642

4. Approve the attached letter and General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

February 27, 1985

[Signature]
BY: Kenneth A. Gross
Associate General Counsel

Attachments

- I. RAD Referral
- II. Proposed General Counsel's Factual & Legal Analysis
- III. Proposed letters

86040513643

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 29 November 1984

ANALYST: Michael D. Butterfield

I. COMMITTEE: Creative Displays, Inc. PAC - ONE
(C00149088)
Beth N. Jackson, Treasurer
P.O. Box 2389
2330 University Boulevard, 9th Floor
Tuscaloosa, AL 35403

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of an Excessive Contribution From a Person
- 2 U.S.C. §441a(f)

The 1984 July Quarterly Report filed by Creative Displays, Inc. PAC-ONE ("PAC-ONE") disclosed a \$41,185 contribution from Lewis Manderson Jr. on May 31, 1984 (Attachment 2). Based upon this information, a Request for Additional Information ("RFAI") was sent to PAC-ONE on October 31, 1984, which recommended that the amount in excess of the \$5,000 limit be refunded (Attachment 3).

On November 9, 1984, PAC-ONE submitted a letter and a copy of two (2) refund checks dated November 6, 1984, to Mr. Manderson totalling \$36,560 (Attachment 4). One check was for a \$36,185 excessive contribution received in 1984, and the other check was for a \$375 excessive contribution received in 1983.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

Attachment I

②

86040513644

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CREATIVE DISPLAYS, INC PAC-ONE						NON-PARTY NON-QUALIFIED ID #C00149088
CONNECTED ORGANIZATION: CREATIVE DISPLAYS INC						
1983	STATEMENT OF ORGANIZATION - AMENDMENT			11OCT83	4	83FEC/284/3096
	MID-YEAR REPORT	6,615	5,800	1JAN83 -30JUN83	10	83FEC/280/2655
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	9	84FEC/348/3567
	1ST LETTER INFORMATIONAL NOTICE			1JAN83 -30JUN83	3	84FEC/348/0197
	YEAR-END	1,244	3,550	1JUL83 -31DEC83	7	84FEC/293/3932
1984	APRIL QUARTERLY	0	2,000	1JAN84 -31MAR84	6	84FEC/309/3147
	JULY QUARTERLY	58,016	750	1APR84 -30JUN84	8	84FEC/319/210
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	1	84FEC/348/3893
	REQUEST FOR ADDITIONAL INFORMATION	0	3,100	1APR84 -30JUN84	3	84FEC/347/4751
	OCTOBER QUARTERLY	0	0	1JUL84 -30SEP84	6	84FEC/341/2177
	PRE-GENERAL	0	0	1OCT84 -17OCT84	3	84FEC/344/0153
TOTAL		75,875	0 15,200	0	60	TOTAL PAGES

- 1.) All reports have been reviewed.
- 2.) Ending cash (10/17/84): \$63,318.88
- 3.) Outstanding debt owed by (10/17/84): -0-

Attachment I
 (3)

Attachment #1

SCHEDULE A

**Attachment #2
ITEMIZED RECEIPTS**

Supplemental Schedule A
This schedule is required for the
preparation of the Schedule
C (Form 1041)

Any information reported here must be reported on Schedule C, and can be used by any person for the purpose of obtaining deductions or for
commercial purposes, other than using the name and address of any subject mentioned to obtain contributions from such persons.

Name of Corporation (or Full Name of Partnership) **Creative Displays, Inc., INC-000** **1984 July Quarterly**

A. Full Name, Mailing Address and ZIP Code	Name of Employee	Date (month, day, year)	Amount of Cash Received This Period
George F. Hubbard 379 Woodland Hills Tuscaloosa, AL 35406	Creative Displays, Inc. Corporation Stockholder Aggregate Year-to-Date - \$ 1,406.00	7-31-84	\$1,406.00
Receipt for ☒ Primary ☐ General (Other type, if any)			
Terry C. Killgore 732 Ashby Street, N. W. Atlanta, GA 30377	Creative Displays, Inc. Corporation Stockholder Aggregate Year-to-Date - \$ 612.00	7-31-84	\$ 612.00
Receipt for ☒ Primary ☐ General (Other type, if any)			
Phil Loman P. O. Box 12076 Norfolk, VA 23502	Creative Displays, Inc. Corporation Stockholder Aggregate Year-to-Date - \$ 408.00	7-31-84	\$ 408.00
Receipt for ☒ Primary ☐ General (Other type, if any)			
Cindy Manderson 302 Inverness Birmingham, AL 35243	Creative Displays, Inc. Corporation Stockholder Aggregate Year-to-Date - \$ 909.00	7-31-84	\$ 909.00
Receipt for ☒ Primary ☐ General (Other type, if any)			
Levis M. Manderson, Jr. 6052 Shoreline Towers E. Condo Destin, FL 32541	Creative Displays, Inc. Corporation Stockholder Aggregate Year-to-Date - \$ 41,185.00	7-31-84	\$41,185.00
Receipt for ☒ Primary ☐ General (Other type, if any)			
Michael G. Manderson 6100 Timberly Road N. Mobile, AL 36609	Creative Displays, Inc. Corporation Stockholder Aggregate Year-to-Date - \$ 960.00	7-31-84	\$ 960.00
Receipt for ☒ Primary ☐ General (Other type, if any)			
James A. McLaughlin 732 Ashby Street, N. W. Atlanta, GA 30377	Creative Displays, Inc. Corporation Stockholder Aggregate Year-to-Date - \$ 408.00	7-31-84	\$ 408.00
Receipt for ☒ Primary ☐ General (Other type, if any)			
SUBTOTAL (All Receipts This Page Reported)			\$45,888.00
TOTAL (Incl. Period Start page 1 to last number only)			\$45,888.00

Attachment I

(4)

86040513646
9331925704



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

OCT 31 1984 RQ-2

Beth N. Jackson, Treasurer
Creative Displays, Inc. Political
Action Committee-One
P.O. Box 2389
2330 University Boulevard, 9th Floor
Tuscaloosa, AL 35403

Identification Number: C00149088

Reference: July Quarterly Report (4/1/84-6/30/84)

Dear Ms. Jackson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor, or transfer-out to a non-Federal account, the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

102111 | 000 492

Attachment I
(5)

86040613647

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Michael Butterfield
Reports Analyst
Reports Analysis Division

86040513648

Attachment I
⑥

RECEIVED AT THE FEC

84 NOV 8 48:48

creative
displays

November 6, 1984

Mr. Michael Butterfield
 Reports Analyst
 Reports Analysis Division
 Federal Election Commission
 Washington, D. C. 20463

Identification Number: C00149088

Reference: Your letters of October 31, 1984 and November 2, 1984

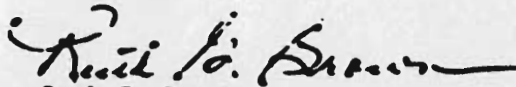
Dear Mr. Butterfield:

Please find enclosed a copy of check numbers 75 and 76 payable to
 Lewis Manderson, Jr., totalling \$36,360.00, which relate to your
 letters referenced above, for the refund due Mr. Manderson. These
 figures will be reported on Schedule B, line 26 or 27 of our next
 report.

A copy of your letters are enclosed for your reference.

If you should have any questions, please contact me.

Sincerely,



Ruth G. Brown
 Assistant Treasurer
 Creative Displays, Inc., PAC-ONE

/rgb

Enclosures

Attachment I

(7)

86040613649
 9173310133479
 TUN-KALIKU-A ALABAMA J4003280 / TELEPHONE 205355-0101
 POSTOFFICE BOX 20463

No 75

11/6 1984

TO THE ORDER OF Lewis Henderson, Jr. \$ 3,250.00

Three Thousand Twenty-five and no/100 DOLLARS

fmb THE FIRST NATIONAL BANK OF TUSCALOOSA

FOR Refund of previous contribution Ruth B. Brown

11/26/84

⑆062200709⑆ ⑆013 511 9⑆

No 76

11/6 1984

TO THE ORDER OF Lewis Henderson, Jr. \$ 36,185.00

Thirty-six Thousand One Hundred Eighty-five and no/100 DOLLARS

fmb THE FIRST NATIONAL BANK OF TUSCALOOSA

FOR Refund of previous contribution Ruth B. Brown

11/3/84

⑆062200709⑆ ⑆013 511 9⑆

Attachment I
 (8)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENT: Lewis Manderson, Jr.

SUMMARY OF ALLEGATIONS

The 1984 July Quarterly Report filed by Creative Displays, Inc. PAC-ONE ("PAC-ONE") disclosed a \$41,185 contribution from Lewis Manderson, Jr., on May 31, 1984. Based upon this information, a Request for Additional Information ("RFAI") was sent to PAC-ONE on October 31, 1984, which recommended that the amount in excess of the \$5,000 limit be refunded.

On November 9, 1984, PAC-ONE submitted a letter and a copy of two (2) refund checks dated November 6, 1984, to Mr. Manderson totalling \$36,560. One check was for a \$36,185 excessive contribution received in 1984, and the other check was for a \$375 excessive contribution received in 1983.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3), states that no person shall make contribution aggregating more the \$25,000 in any calendar year.

2 U.S.C. § 441a(f), states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

Attachment II
⑨

86040513651

In view of the fact that the two contributions from Mr. Manderson exceeded the contribution limitation by \$36,560, the Office of General Counsel recommends that the Commission find reason to believe that Lewis Manderson, Jr., violated 2 U.S.C. §§ 441a(a) (1) (C) and 441a(a) (3).

86040613652

Attachment II

(10)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO.

RESPONDENTS: Creative Displays, Inc. PAC-ONE
Beth N. Jackson, Treasurer

SUMMARY OF ALLEGATIONS

The 1984 July Quarterly Report filed by Creative Displays, Inc. PAC-ONE ("PAC-ONE") disclosed a \$41,185 contribution from Lewis Manderson, Jr., on May 31, 1984. Based upon this information, a Request for Additional Information ("RFAI") was sent to PAC-ONE on October 31, 1984, which recommended that the amount in excess of the \$5,000 limit be refunded.

On November 9, 1984, PAC-ONE submitted a letter and a copy of two (2) refund checks dated November 6, 1984, to Mr. Manderson totalling \$36,560. One check was for a \$36,185 excessive contribution received in 1984, and the other check was for a \$375 excessive contribution received in 1983.

FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(1)(A), states that no person shall make contributions to any multicandidate political committee in any calendar year which, in the aggregate, exceeds \$5,000.

2 U.S.C. § 441a(a)(3), states that no person shall make contribution aggregating more the \$25,000 in any calendar year.

2 U.S.C. § 441a(f), states that no multicandidate political committee shall knowingly accept or make any expenditure in violation of the \$5,000 aggregate limitation imposed on contributions under this section.

Attachment II
(11)

In view of the fact that the two contributions from Mr. Manderson exceeded the contribution limitation by \$36,560, the Office of General Counsel recommends that the Commission find reason to believe that the Creative Displays, Inc. PAC-ONE and Beth N. Jackson, as treasurer, violated 2 U.S.C. § 441a(f).

86040513654

Attachment II
(12)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Lewis M. Manderson, Jr.
6052 Shoreline Towers E. Condo
Destin, Florida 32541

RE: MUR

Dear Mr. Manderson:

On , 1985, the Federal Election Commission determined that there is reason to believe you, violated 2 U.S.C. §§ 441a(a)(1)(C) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Attachment III
(13)

86040513655

Lewis M. Manderson, Jr.
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's proceduress for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

86040513656

Attachment III
(14)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Beth N. Jackson, Treasurer
Creative Displays, Inc. PAC-ONE
P.O. Box 2389
2330 University Boulevard, 9th Floor
Tuscaloosa, Alabama 35403

RE: MUR

Dear Ms. Jackson:

On , 1985, the Federal Election Commission determined that there is reason to believe Creative Displays, Inc. PAC-ONE and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within ten days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Attachment III
(15)

86040513657

Beth N. Jackson, Treasurer
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's proceduress for handling possible violations of the Act. If you have any questions, please contact George Demougeot, the staff member assigned to this matter, at (202) 523-4000.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

Attachment III
16

86040513658

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 29 November 1984

ANALYST: Michael D. Butterfield

I. COMMITTEE: Creative Displays, Inc. PAC - ONE
(C00149088)
Beth W. Jackson, Treasurer
P.O. Box 2389
2330 University Boulevard, 9th Floor
Tuscaloosa, AL 35403

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)

III. BACKGROUND:

Receipt of an Excessive Contribution From a Person
- 2 U.S.C. §441a(f)

The 1984 July Quarterly Report filed by Creative Displays, Inc. PAC-ONE ("PAC-ONE") disclosed a \$41,185 contribution from Lewis Manderson Jr. on May 31, 1984 (Attachment 2). Based upon this information, a Request for Additional Information ("RFAI") was sent to PAC-ONE on October 31, 1984, which recommended that the amount in excess of the \$5,000 limit be refunded (Attachment 3).

On November 9, 1984, PAC-ONE submitted a letter and a copy of two (2) refund checks dated November 6, 1984, to Mr. Manderson totalling \$36,560 (Attachment 4). One check was for a \$36,185 excessive contribution received in 1984, and the other check was for a \$375 excessive contribution received in 1983.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None

86040613659

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
CREATIVE DISPLAYS, INC PAC-ONE						
CONNECTED ORGANIZATION: CREATIVE DISPLAYS INC						
NON-PARTY NON-QUALIFIED ID #C00149088						
1983	STATEMENT OF ORGANIZATION - AMENDMENT			11OCT83	4	83FEC/284/3096
	MID-YEAR REPORT	16,615	5,800	1JAN83 -30JUN83	10	83FEC/280/2655
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN83 -30JUN83	9	84FEC/348/3567
	1ST LETTER INFORMATIONAL NOTICE			1JAN83 -30JUN83	3	84FEC/348/0197
	YEAK-END	1,244	3,550	1JUL83 -31DEC83	7	84FEC/293/3932
1984	APRIL QUARTERLY	0	2,000	1JAN84 -31MAR84	6	84FEC/309/3142
	JULY QUARTERLY	58,016	750	1APR84 -30JUN84	8	84FEC/319/2165
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	1	84FEC/348/3893
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	3	84FEC/347/4751
	OCTOBER QUARTERLY	0	3,100	1JUL84 -30SEP84	6	84FEC/341/2177
	PRE-GENERAL	0	0	1OCT84 -17OCT84	3	84FEC/344/0153
	TOTAL	75,875	0 15,200	0	60	TOTAL PAGES

- 1.) All reports have been reviewed.
- 2.) Ending cash (10/17/84): \$63,318.88
- 3.) Outstanding debt owed by (10/17/84): -0-

SCHEDULE A

**Attachment #2
ITEMIZED RECEIPTS**

Statement of the donor to the IRS
The donor certifies that the amounts reported on this statement are true and correct.

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of obtaining contributions or for commercial purposes, other than those for which the donor has authorized the use of the information.

Name of Corporation (or Full Name of Donor) **Creative Displays, Inc. 800-442-1111** **1984 July Quarterly**

A. Full Name, Mailing Address and ZIP Code	Name of Employee	Date (month, day, year)	Amount of Cash Received This Period
George F. Hubbard 379 Woodland Hills Tuscaloosa, AL 35406	Creative Displays, Inc. President Stockholder	3-31-84	\$1,406.00
Receipt for ☒ Primary ☐ General (Other category)	Aggregate Year-to-Date - \$ 1,406.00		
Terry C. Killgore 732 Ashby Street, N. W. Atlanta, GA 30377	Creative Displays, Inc. President Stockholder	3-31-84	\$ 612.00
Receipt for ☒ Primary ☐ General (Other category)	Aggregate Year-to-Date - \$ 612.00		
Phil Loman P. O. Box 12076 Norfolk, VA 23502	Creative Displays, Inc. President Stockholder	3-31-84	\$ 400.00
Receipt for ☒ Primary ☐ General (Other category)	Aggregate Year-to-Date - \$ 400.00		
Cindy Henderson 302 Inverness Birmingham, AL 35243	Creative Displays, Inc. President Stockholder	3-31-84	\$ 909.00
Receipt for ☒ Primary ☐ General (Other category)	Aggregate Year-to-Date - \$ 909.00		
Levis H. Henderson, Jr. 6052 Shoreline Towers E. Condo Destin, FL 32341	Creative Displays, Inc. President Stockholder	3-31-84	\$41,185.00
Receipt for ☒ Primary ☐ General (Other category)	Aggregate Year-to-Date - \$ 41,185.00		
Michael G. Henderson 6100 Timberly Road N. Mobile, AL 36609	Creative Displays, Inc. President Stockholder	3-31-84	\$ 960.00
Receipt for ☒ Primary ☐ General (Other category)	Aggregate Year-to-Date - \$ 960.00		
James A. McLaughlin 732 Ashby Street, N. W. Atlanta, GA 30377	Creative Displays, Inc. President Stockholder	3-31-84	\$ 400.00
Receipt for ☒ Primary ☐ General (Other category)	Aggregate Year-to-Date - \$ 400.00		
SUBTOTAL (if Receipts This Page Supplement)			\$45,880.00
TOTAL (if Receipts This Page Supplement)			

86040513661
933:425704



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

OCT 31 1984 HQ-2

Beth M. Jackson, Treasurer
 Creative Displays, Inc. Political
 Action Committee-One
 P.O. Box 2389
 2330 University Boulevard, 9th Floor
 Tuscaloosa, AL 35403

Identification Number: C00149088

Reference: July Quarterly Report (4/1/84-6/30/84)

Dear Ms. Jackson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a committee from receiving contributions from another political committee or a person in excess of \$5,000 per calendar year. (2 U.S.C. §441a(f)) If you have received a contribution that exceeds the limits, the Commission recommends that you refund to the donor, or transfer-out to a non-Federal account, the amount in excess of \$5,000. Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. In addition, the disbursement of the amount in excess should be disclosed on a supporting Schedule B for Line 26 or 27 of your next report.

If the contribution(s) in question was incorrectly reported and/or you have additional information, you may wish to submit documentation for the public record.

Although the Commission may take further legal steps concerning the acceptance of an excessive contribution(s), your prompt refund or transfer-out of the excessive amount will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

102111 and 2492

86040513662

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Michael Butterfield
Reports Analyst
Reports Analysis Division

86040613663

RECEIVED AT THE FEC

04 NOV 84 10:46

Creative
Displays

November 6, 1984

Mr. Michael Butterfield
 Reports Analyst
 Reports Analysis Division
 Federal Election Commission
 Washington, D. C. 20463

Identification Number: C00149002

Reference: Your letters of October 31, 1984 and November 2, 1984

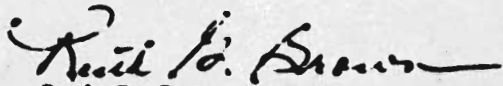
Dear Mr. Butterfield:

Please find enclosed a copy of check numbers 75 and 76 payable to
 Lewis Manderson, Jr., totalling \$36,560.00, which relate to your
 letters referenced above, for the refund due Mr. Manderson. These
 figures will be reported on Schedule B, line 26 or 27 of our next
 report.

A copy of your letters are enclosed for your reference.

If you should have any questions, please contact me.

Sincerely,



Ruth G. Brown
 Assistant Treasurer
 Creative Displays, Inc., PAC-ONE

/rgb

Enclosures

86040613664
417331613537

POSTOFFICE BOX 2189 TUSCALOOSA ALABAMA 35602-2189 / TELEPHONE 205345-0141

No 75

1 TO THE ORDER OF Lewis Henderson, Jr. 11/6 1984

Three Thousand Seven Hundred and Fifty 8,975.00

fmb THE FIRST NATIONAL BANK OF TULSA, OKLA. PAID ONE

Refund of previous contribution 11/6/84 Ruth B. Brown

⑆062200709⑆ ⑆013 511 9⑆

No 76

2 TO THE ORDER OF Lewis Henderson, Jr. 11/6 1984

Thirty-six Thousand One Hundred Eighty-five 36,185.00

fmb THE FIRST NATIONAL BANK OF TULSA, OKLA. PAID ONE

Refund of previous contribution 11/6/84 Ruth B. Brown

⑆062200709⑆ ⑆013 511 9⑆

86040613665
86403103568

86040513666



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1904

Date Filmed 9/23/86 Camera No. --- 2

Cameraman AS