



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

THIS IS THE END OF MUR # 2121

Date Filmed 6/2/86 Camera No. --- 2

Cameraman AS

86040590288

FEDERAL ELECTION COMMISSION

Day report, comment sheets, meeting slips,
Concubation matters, referral information,
Internal communications

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):

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

Signed

Charles W. Smith

date

May 16, 1986

FEC 5-21-77

Tracy
5/28/86

86040790289



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 1, 1986

J. Curtis Herge
Suite 200
8201 Greensboro Drive
McLean, Virginia 22101

RE: MUR 2121

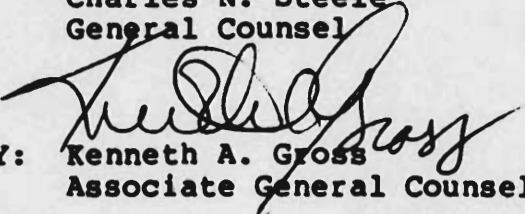
Dear Mr. Herge:

On April 29 , 1986, the Commission accepted the conciliation agreements signed by your clients and a civil penalty in settlement of a violation of 2 U.S.C. §§ 441a(f) and 441a(a)(1), 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 agreements for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreements

86040590290

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
American Space Frontier Committee) MUR 2121
and C. Monroe Thomas, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe was found that the American Space Frontier Committee and C. Monroe Thomas, as treasurer ("Respondent") violated 2 U.S.C. § 441a(f) by accepting an excessive contribution.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding a probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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 American Space Frontier Committee is a political committee as defined in 2 U.S.C. § 431(4).

95040320291

2. Respondent C. Monroe Thomas was the treasurer of said political committee at the time this matter was initiated by the Commission. Peter B. Gemma, Jr. was the treasurer of said political committee on February 6, 1984.

3. Respondents accepted a loan of \$13,530 from the Palmer National Bank on February 6, 1984, and repaid the loan in full, with interest, on March 13, 1984.

4. General Daniel Graham was the guarantor of said loan.

V. Respondents' acceptance of a \$13,530 loan that was guaranteed by one individual constitutes the acceptance by Respondents of an excessive contribution of \$8,530 in violation of 2 U.S.C. § 441a(f).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. 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 own 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 in the United States District Court for the District of Columbia.

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

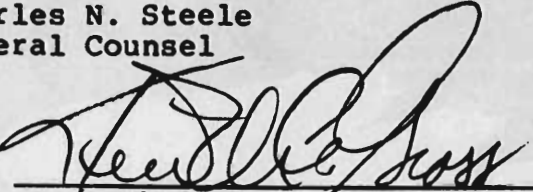
X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. 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

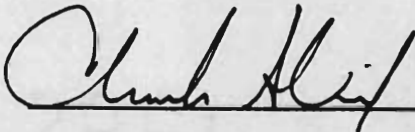
BY:


Kenneth A. Gross
Associate General Counsel

Date

April 30, 1986

FOR THE RESPONDENTS:



TREASURER

3/21/86

86040590293

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

General Daniel Graham)

MUR 2121

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe was found that General Daniel Graham ("Respondent") violated 2 U.S.C. § 441a(a)(1) by making an excessive contribution.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding a probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent was chairman of a political committee, the American Space Frontier Committee ("ASF").

2. On February 6, 1984, ASF received a loan of \$13,530 from the Palmer National Bank. The loan was repaid by American Space Frontier Committee, in full, with interest, on March 13, 1984.

86040590294

3. Respondent guaranteed said loan.

V. Respondent's guaranty of a \$13,530 loan to ASF constituted an excessive contribution of \$8,530 to a political committee in violation of 2 U.S.C. § 441a(a)(1).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that he shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. 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 own 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.

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

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

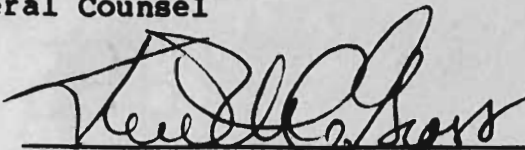
86040590295

XI. 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.

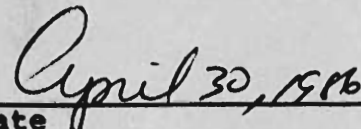
FOR THE COMMISSION:

Charles N. Steele
General Counsel

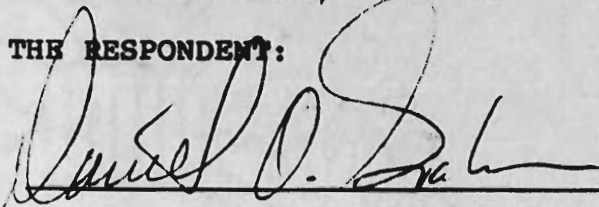
BY:

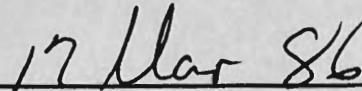

Kenneth A. Gross
Associate General Counsel

Date


April 30, 1986

FOR THE RESPONDENT:


Daniel O. Sullivan


17 Mar 86

86040570296

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
American Space Frontier Committee) MUR 2121
and Charles S. Via, as treasurer)
General Daniel Graham)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 29, 1986, the Commission decided by a vote of 5-0 to take the following actions in MUR 2121:

1. Accept the conciliation agreement, as recommended in the General Counsel's Report signed April 24, 1986.
2. Close the file.

Commissioners Aikens, Elliott, Harris, Josefiak and McDonald voted affirmatively for this decision; Commissioner McGarry did not cast a vote.

Attest:

4-29-86

Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Thurs.,	4-24-86,	2:24
Circulated on 48 hour tally basis:	Fri.,	4-25-86,	2:00
Deadline for vote:	Tues.,	4-29-86,	4:00

86040590297



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *red*
DATE: April 24, 1986
SUBJECT: MUR 2121 - General Counsel's Report

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

CIRCULATIONS		DISTRIBUTION	
48 Hour Tally Vote	☒	Compliance	☒
Sensitive	☒	Audit Matters	☐
Non-Sensitive	☐	Litigation	☐
24 Hour No Objection	☐	Closed MUR Letters	☐
Sensitive	☐	Status Sheets	☐
Non-Sensitive	☐	Advisory Opinions	☐
Information	☐	Other (see distribution below)	☐
Sensitive	☐		
Non-Sensitive	☐		
Other	☐		

86040570298

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
American Space Frontier Committee)
and Charles S. Via, as treasurer)
General Daniel Graham)

MUR 2121

GENERAL COUNSEL'S REPORT

BACKGROUND

Attached are two conciliation agreements, one signed by Charles S. Via on behalf of the American Space Frontier Committee ("ASF") and its treasurer, and the other by Daniel Graham on behalf of himself. Checks for the civil penalty have been received.

86040570299

RECOMMENDATION

The Office of the General Counsel recommends the acceptance of this agreement and the closing of the file.

Charles N. Steele
General Counsel

April 24, 1986
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. RAD letter
2. Conciliation agreements -
photocopy of civil penalty
checks
3. Letter from Curtis Herge
4. Proposed letter to Curtis Herge

86040590300

Attachment 1

Attachment 5



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RG-2

AUG 7 1985

C. Monroe Thomas, Treasurer
American Space Frontier Committee
7777 Leesburg Pike, Suite 307N
Falls Church, VA 22043

Identification Number: C90168468

Reference: April Quarterly Amended Report (1/1/84-3/31/84)

Dear Mr. Thomas:

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:

enc [-Your report discloses a contribution which appears to exceed the limitations of 2 U.S.C. §441a (pertinent portion attached). A loan, endorsement, or guarantee is included in the definition of a contribution under 2 U.S.C. §431(8)(A) and 11 CFR 100.7(a)(1)(i).]

The Commission notes the repayment of the loan, however, further legal steps may be taken concerning the acceptance of an excessive contribution.

-The outstanding debt owed to Robert Dornan appears to be incorrect. FEC calculations disclose this amount to be \$15,000. Please provide the correct balance for this debt.

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

Robyn Withson
Reports Analyst
Reports Analysis Division

86040590301
03033950991

attachment 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

American Space Frontier Committee
and C. Monroe Thomas, as treasurer

MUR 2121

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe was found that the American Space Frontier Committee and C. Monroe Thomas, as treasurer ("Respondent") violated 2 U.S.C. § 441a(f) by accepting an excessive contribution.

NOW, THEREFORE, the Commission and Respondents, having participated in informal methods of conciliation, prior to a finding a probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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 American Space Frontier Committee is a political committee as defined in 2 U.S.C. § 431(4).

86040590302

2. Respondent C. Monroe Thomas was the treasurer of said political committee at the time this matter was initiated by the Commission. Peter B. Gemma, Jr. was the treasurer of said political committee on February 6, 1984.

3. Respondents accepted a loan of \$13,530 from the Palmer National Bank on February 6, 1984, and repaid the loan in full, with interest, on March 13, 1984.

4. General Daniel Graham was the guarantor of said loan.

V. Respondents' acceptance of a \$13,530 loan that was guaranteed by one individual constitutes the acceptance by Respondents of an excessive contribution of \$8,530 in violation of 2 U.S.C. § 441a(f).

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. 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 own 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 in the United States District Court for the District of Columbia.

3030303040590303

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

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

XI. 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:

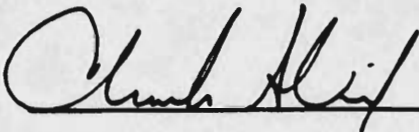
Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENTS:



TREASURER

3/21/86

86040590304



MEMORANDUM

CCH#130

TO: Debra A. Reed /
FROM: Judy Smith
FROM: Debra A. Reed

CHECK NO. 1024 (a copy of which is attached) RELATING
TO MUR 2121 AND NAME General Daniel Graham
AS RECEIVED ON 4/2/86. PLEASE INDICATE THE ACCOUNT INTO
WHICH IT SHOULD BE DEPOSITED:

- / ☒ BUDGET CLEARING ACCOUNT (#95F3875.160)
- / / CIVIL PENALTIES ACCOUNT (#95-1099.160)
- / / OTHER _____

SIGNATURE Debra A. Reed DATE 4/18/86

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
General Daniel Graham

)
)
) MUR 2121

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. Reason to believe was found that General Daniel Graham ("Respondent") violated 2 U.S.C. § 441a(a)(1) by making an excessive contribution.

NOW, THEREFORE, the Commission and Respondent, having participated in informal methods of conciliation, prior to a finding a probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent was chairman of a political committee, the American Space Frontier Committee ("ASF").

2. On February 6, 1984, ASF received a loan of \$13,530 from the Palmer National Bank. The loan was repaid by American Space Frontier Committee, in full, with interest, on March 13, 1984.

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3. Respondent guaranteed said loan.

V. Respondent's guaranty of a \$13,530 loan to ASF constituted an excessive contribution of \$8,530 to a political committee in violation of 2 U.S.C. § 441a(a)(1).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of One Thousand Dollars (\$1,000.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that he shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

VIII. 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 own 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.

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

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

36040590307

XI. 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:

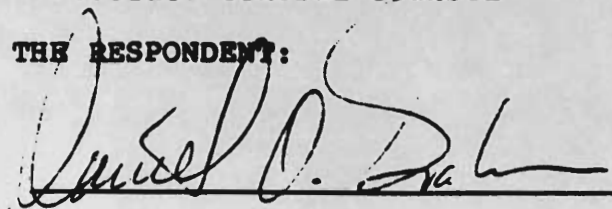
Charles N. Steele
General Counsel

BY:

Kenneth A. Gross
Associate General Counsel

Date

FOR THE RESPONDENT:



17 Mar 86

86040790308

Snyder

AMERICAN SPACE FRONTIER COMMITTEE 1-86

1024

FEDERAL FUND
PO BOX 1984
MERRIFIELD, VA 22116

3/24

68-315
560 1
19 86

PAY TO THE ORDER OF TREASURER OF THE UNITED STATES

\$ 1000.00

ONE THOUSAND AND 00/100

DOLLARS

Enterprise Bank

7707 LEESBURG PIKE
FALLS CHURCH, VIRGINIA 22043

Chub Alf

FOR CANCELLATION AGREEMENT

Monroe P. Todd

⑆056003⑆58⑆ 500 128 67⑈

MEMORANDUM

CCH#130

TO: Debra A. Reed

TO: Judy Smith

FROM: Judy Smith

FROM: Debra A. Reed

CHECK NO. 1024 (a copy of which is attached) RELATING

TO MUR 2121 AND NAME American Space Frontier Committee

C. Monroe Thomas, Treasurer

WAS RECEIVED ON 4/21/86. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ☒ BUDGET CLEARING ACCOUNT (#95F3875.160)

/ / CIVIL PENALTIES ACCOUNT (#95-1099.160)

/ / OTHER

SIGNATURE Debra A. Reed

DATE 4/8/86

8 6 0 4 0 5 0 6 2 0 0

Attachment?

Snyder

CCC#30
10:22

HERGE, SPARKS, CHRISTOPHER & BIONDI

ATTORNEYS AT LAW

SUITE 200

8201 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
GEORGE V. BIONDI
DONNA LYNN MILLER

March 27, 1986

(703) 848-4700

5-11-86
2
AM:32

Charles Snyder, Esq.
Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463

RE: MUR 2121

Dear Mr. Snyder:

Enclosed, in connection with the above-captioned matter, are the following:

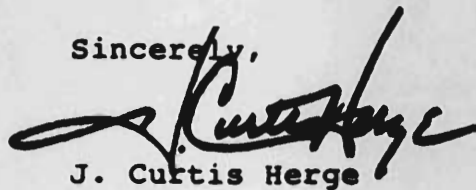
(1) The Conciliation Agreement of American Space Frontier Committee, executed by Charles S. Via, Treasurer of the Committee, together with a check drawn to the order of Treasurer of the United States in the amount of \$1,000.00 in payment of the civil penalty.

(2) The Conciliation Agreement of General Daniel O. Graham, signed by General Graham, together with a check drawn to the order of Treasurer of the United States in the amount of \$1,000.00 in payment of the civil penalty.

86040590310

Charles Snyder, Esq.
March 27, 1986
Page 2

Sincerely,



J. Curtis Herge

:sbl

Enclosures

cc: General Daniel O. Graham
Mr. Charles S. Via

36040590311

Harbert 4



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

J. Curtis Herge
Suite 200
8201 Greensboro Drive
McLean, Virginia 22101

RE: MUR 2121

Dear Mr. Herge:

On , 1986, the Commission accepted the conciliation agreements signed by your clients and a civil penalty in settlement of a violation of 2 U.S.C. §§ 441a(f) and 441a(a)(1), 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 agreements for your files.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreements

86040590312

AMERICAN SPACE FRONTIER COMMITTEE 1-86

FEDERAL FUND
PO BOX 1984
MERRIFIELD, VA 22116

1024

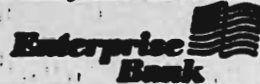
3/24

68-315
19 86 560 1

PAY TO THE ORDER OF TREASURER OF THE UNITED STATES \$ 1000.00

ONE THOUSAND AND 04/100

DOLLARS



7707 LEESBURG PIKE
FALLS CHURCH, VIRGINIA 22043

FOR CANCELLATION AGREEMENT

Chub Alf
Monroe P. Todd

⑆056003158⑆ 500 128 67⑈

MEMORANDUM

C/C# 130

TO: Debra A. Reed

TO: Judy Smith

FROM: Judy Smith

FROM: Debra A. Reed

CHECK NO. 1024 (a copy of which is attached) RELATING

TO MUR 2121 AND NAME American Space Frontier Committee

C. Monroe Thomas, Treasurer

WAS RECEIVED ON 4/21/86. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ☒ BUDGET CLEARING ACCOUNT (#95F3875.160)

/ / CIVIL PENALTIES ACCOUNT (#95-1099.160)

/ / OTHER

SIGNATURE

Debra A. Reed

DATE

4/8/86

8 6 0 4 0 5 0 6 1 2

DANIEL O. GRAHAM (LT GEN RET)
SPECIAL ACCOUNT
2427 FORT SCOTT DRIVE
ARLINGTON, VIRGINIA 22202

901
13 Mar 1986 88-424 48
580

PAY TO THE ORDER OF 1000 of the U.S. 1000.00
One Thousand and 00/100 DOLLARS

1st AMERICAN
FIRST AMERICAN BANK OF VIRGINIA
JACKSON, VIRGINIA 22020

MEMO CANCELLATION AGREEMENT

05600424003900804500901

MEMORANDUM

CCH# 130

Debra A. Reed

~~TO: Judy Smith~~

FROM: Judy Smith

FROM: Debra A. Reed

CHECK NO. 1024 (a copy of which is attached) RELATING

TO MUR 2121 AND NAME General Daniel Graham

WAS RECEIVED ON 4/2/86. PLEASE INDICATE THE ACCOUNT INTO

WHICH IT SHOULD BE DEPOSITED:

/ ☒ BUDGET CLEARING ACCOUNT (#95F3875.160)
/ / CIVIL PENALTIES ACCOUNT (#95-1099.160)
/ / OTHER _____

SIGNATURE Debra A. Reed

DATE 4/8/86

36112
All: 33



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: *MWE* MARJORIE W. EMMONS/ CHERYL A. FLEMING *CAF*

DATE: MARCH 28, 1986

SUBJECT: MUR 2121 - GENERAL COUNSEL'S REPORT
SIGNED MARCH 26, 1986

The above-captioned matter was circulated by the Commission Secretary's Office to the Commissioners on Thursday, March 27, 1986 at 4:00 P.M.

There were no objections received in the Office of the Secretary of the Commission to the General Counsel's Report at the time of the deadline.

86040590315



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *rd*
DATE: March 27, 1986
SUBJECT: MUR 2121 - 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 []
 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) []

85040590316

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)

American Space Frontier Committee)
and C. Monroe Thomas, as treasurer)
General Daniel Graham)

MUR 2120 MAR 27 11:21

GENERAL COUNSEL'S REPORT

On February 21, 1986, the Commission authorized the commencement of conciliation with the Respondents in the above-captioned Matter prior to a finding of probable cause to believe.

Charles N. Steele
General Counsel

March 26, 1986
Date

BY:

Kenneth A. Gross
Associate General Counsel

86040590317



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 24, 1986

J. Curtis Herge, Esquire
Herge, Sparks, Christopher & Biondi
Suite 200
8201 Greensboro Drive
McLean, Virginia 22102

RE: MUR 2121
American Space Frontier
Committee and C. Monroe
Thomas, as treasurer;
Daniel Graham

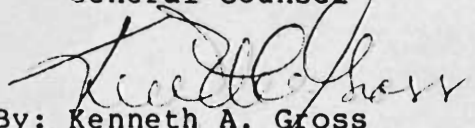
Dear Mr. Herge:

On January 2, 1986, the Commission found reason to believe that the American Space Frontier Committee and C. Monroe Thomas, as treasurer, violated 2 U.S.C. § 441a(f) and that General Daniel Graham violated 2 U.S.C. § 441a(a)(1). At your request, the Commission determined on February 21, 1986, to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please sign and return them along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreements, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel


By: Kenneth A. Gross
Associate General Counsel

Enclosures

86040590318



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

J. Curtis Herge, Esquire
Herge, Sparks, Christopher & Biondi
Suite 200
8201 Greensboro Drive
McLean, Virginia 22102

RE: MUR 2121
American Space Frontier
Committee and C. Monroe
Thomas, as treasurer;
Daniel Graham

Dear Mr. Herge:

On January 2, 1986, the Commission found reason to believe that the American Space Frontier Committee and C. Monroe Thomas, as treasurer, violated 2 U.S.C. § 441a(f) and that General Daniel Graham violated 2 U.S.C. § 441a(a)(1). At your request, the Commission determined on , 198 , to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please sign and return them along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreements, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

CS
3/24/86
CS
2/21

By: Kenneth A. Gross
Associate General Counsel

Enclosures

83040590319

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2121
American Space Frontier Committee)
and C. Monroe Thomas, as treasurer,)
General Daniel Graham)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 21, 1986, the Commission decided by a vote of 4-0 to take the following actions in MUR 2121:

1. Enter into conciliation with the American Space Frontier Committee and C. Monroe Thomas, as treasurer, and General Daniel Graham, prior to a finding of probable cause to believe.
2. Approve and send the proposed conciliation agreements attached to the General Counsel's Report signed February 14, 1986.
3. Approve and send the letter attached to the General Counsel's Report signed February 14, 1986.

Commissioners Elliott, Josfiak, McDonald and McGarry voted affirmatively for this decision; Commissioners Aikens and Harris did not vote.

Attest:

2-21-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Tues.,	2-18-86,	2:35
Circulated on 48 hour tally basis:	Wed.,	2-19-86,	11:00
Deadline for vote:	Fri.,	2-21-86,	11:00

86040590320



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

February 24, 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION: CHARLES SNYDER

FROM: LEE GARRITY
COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 2121: AMERICAN SPACE FRONTIER COMMITTEE

Please review the attached Request for Additional Information which is to be sent to the American Space Frontier Committee for the 1985 Year-End Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 5:30 p.m. on Wednesday, February 26, 1986. Thank you.

COMMENTS:

Attachment

86040590321



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

Charles S. Via, Treasurer
American Space Frontier Committee
1010 Vermont Avenue, NW, Suite 516
Washington, D.C. 20005

Identification Number: C00168468

Reference: Year End Report (8/24/85-12/31/85)

Dear Mr. Via:

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:

-Please clarify all expenditures made for mailing fees, printing, postage, list maintenance, fundraising and consulting fees. If a portion or all of these expenditures were made on behalf of specifically identified Federal candidates, they should be disclosed on Schedule B or E for Line 21 or 22 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

-The outstanding balance of a debt owed to a creditor at the close of one report should be exactly the same as the beginning outstanding balance of the next report. Your 1985 Year End Report discloses a beginning cash balance of \$423.69 owed to National Conversion Systems, while your 1985 Mid-Year Report does not disclose any outstanding debts owed to National Conversion Systems. Please clarify this discrepancy.

Schedule D of your Report discloses a \$0 beginning balance for MCI, with \$94.19 in "Amount Incurred This Period." Schedule B of your report discloses \$392.26 for "Payment This Period", with an outstanding balance of \$298.07. Please clarify this discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need

26040590322

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Michael D. Butterfield

Michael D. Butterfield
Reports Analyst
Reports Analysis Division

86040590323



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *rd*
DATE: February 18, 1986
SUBJECT: MUR 2121 - 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	☒
Sensitive	☒
Non-Sensitive	☐
24 Hour No Objection	☐
Sensitive	☐
Non-Sensitive	☐
Information	☐
Sensitive	☐
Non-Sensitive	☐

Other ☐

DISTRIBUTION

Compliance	☒
Audit Matters	☐
Litigation	☐
Closed MUR Letters	☐
Status Sheets	☐
Advisory Opinions	☐

Other (see distribution below) ☐

86040590324

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

American Space Frontier Committee)
and C. Monroe Thomas, as treasurer,)
General Daniel Graham)

MUR 2121 P2:35

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On January 2, 1986, the Federal Election Commission found reason to believe that the American Space Frontier Committee ("ASF") and C. Monroe Thomas, as treasurer, violated 2 U.S.C. § 441a(f), and that General Daniel Graham violated 2 U.S.C. § 441a(a)(1). Respondents have now requested pre-probable cause conciliation. (See Attachment 1)

II. LEGAL ANALYSIS

(See First General Counsel's Report, signed December 23, 1985).

It is undisputed that General Graham guaranteed a \$13,530 bank loan to ASF and its treasurer. This guaranty represents an \$8,530 excessive contribution from General Graham to ASF. This Office therefore recommends proceeding to pre-probable cause conciliation.

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

86040790325

IV. RECOMMENDATIONS

1. Enter into conciliation with the American Space Frontier Committee and C. Monroe Thomas, as treasurer, and General Daniel Graham, prior to a finding of probable cause to believe.
2. Approve and send the attached proposed conciliation agreements.
3. Approve and send the attached letter.

Charles N. Steele
General Counsel

Date

February 14, 1986

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

1. Request for pre-probable cause conciliation
2. Proposed conciliation agreements (2)
3. Proposed letter to respondents

cs/8

86040590326

Rec'd. Office
1-30-86
Snyder
Attachment 1

CC# 9595

HERGE, SPARKS, CHRISTOPHER & BIONDI

ATTORNEYS AT LAW

SUITE 200

8201 GREENSBORO DRIVE

MCLEAN, VIRGINIA 22102

20 JAN 30 AM 11:40

J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
GEORGE V. BIONDI
DONNA LYNN MILLER

(703) 848-4700

January 28, 1986

The Honorable Joan D. Aikens
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463

Attention: Charles Snyder, Esq.
Office of General Counsel

RE: MUR 2121

Dear Madam Chairman:

This responds to your letter to me, dated January 14, 1986, in which you reported that the Federal Election Commission has determined there is reason to believe that our client, American Space Frontier Committee and its treasurer, may have violated 2 U.S.C. 441a(f) and 11 CFR 100.7(b)(11) in connection with a \$13,500.00 bank loan from The Palmer National Bank on or about February 6, 1984, which loan was repaid in full with interest on or about March 13, 1984. This letter also responds to your similar notification to General Daniel O. Graham, there being enclosed herewith a Statement of Designation of Counsel signed by General Graham.

This will serve to notify you, pursuant to 11 CFR 111.18(d), that our clients are interested in pursuing pre-probable cause conciliation in connection with this matter. In furtherance of an expedient resolution, we are submitting to you herewith the executed affidavits of General Graham and Mr. Walter G. Lukens, which explain that the loan in question was taken to provide funds for the direct-mail fundraising solicitation program of American Space Frontier Committee; and, that no individual associated with the transaction was aware of the fact that the loan proceeds would constitute a contribution from General Graham to the Committee. General Graham serves as the Chairman of American Space Frontier Committee and Mr. Lukens was, at the time, an employee of the firm which managed the direct-mail fundraising program of the Committee.

96 JAN 30 PM 12:13

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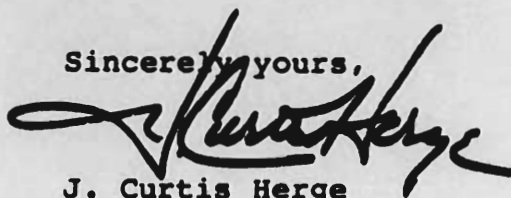
The Honorable Joan D. Aikens
January 28, 1986
Page 2

86040590328

sbl

Enclosures

Sincerely yours,

A handwritten signature in dark ink, appearing to read "J. Curtis Herge". The signature is fluid and cursive, with a large, stylized initial "J" and a long, sweeping underline.

J. Curtis Herge

BEFORE THE FEDERAL ELECTION COMMISSION

AMERICAN SPACE FRONTIER
COMMITTEE,
Respondent

MUR 2121

AFFIDAVIT OF DANIEL O. GRAHAM

COMMONWEALTH OF VIRGINIA)
COUNTY OF FAIRFAX) to-wit:

DANIEL O. GRAHAM, being duly sworn, deposes and says:

1. That he has personal knowledge of the facts relating to a loan made by The Palmer National Bank on or about February 6, 1984, in the amount of \$13,530.00, which loan is the subject of Matter Under Review 2121.

2. That he is Chairman of American Space Frontier Committee, a political committee subject to the provisions of the Federal Election Campaign Act of 1971, as amended.

3. That, at the time the loan was made, Ann E. W. Stone and Associates, Inc. was the firm engaged by American Space Frontier Committee to coordinate and manage the direct-mail fundraising solicitation program of American Space Frontier Committee.

4. That Ann E. W. Stone and Associates, Inc. undertook to negotiate and assist with the processing of the subject loan from The Palmer National Bank to provide funds to pay postage for a planned mailing for American Space Frontier Committee, the requisite loan documents being presented to your deponent for signature by Walter G. Lukens, an employee of Ann E. W. Stone and

Associates, Inc.

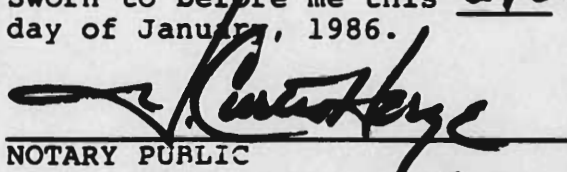
5. That he had no knowledge of the fact that the Federal Election Campaign Act of 1971, as amended, and the Regulations thereunder of the Federal Election Commission contained provisions that would deem the loan proceeds to be the equivalent of a contribution from your deponent to American Space Frontier Committee and that, to the best of his knowledge, no other officer or employee of American Space Frontier Committee, no individual associated with the processing of the loan at The Palmer National Bank and no employee of Ann E. W. Stone and Associates, Inc. had knowledge of such fact at the time the loan was processed and the proceeds thereof used in furtherance of the programs of the Committee.

IN WITNESS WHEREOF, this Affidavit was executed on the 27th day of January, 1986.



DANIEL O. GRAHAM

Sworn to before me this 27th
day of January, 1986.



NOTARY PUBLIC

My Commission Expires: August 22, 1988

BEFORE THE FEDERAL ELECTION COMMISSION

AMERICAN SPACE FRONTIER
COMMITTEE,
Respondent

MUR 2121

AFFIDAVIT OF WALTER G. LUKENS

COMMONWEALTH OF VIRGINIA)
COUNTY OF FAIRFAX) to-wit:

WALTER G. LUKENS, being duly sworn, deposes and says:

1. That he has personal knowledge of the facts relating to a loan made by The Palmer National Bank on or about February 6, 1984, in the amount of \$13,530.00, which loan is the subject of Matter Under Review 2121.

2. That, at the time the loan was made, he was employed by the firm, Ann E. W. Stone and Associates, Inc., which firm coordinated and managed the direct-mail fundraising solicitation program of American Space Frontier Committee; and, as such an employee, he served as the day-to-day supervisor and manager of the direct-mail account of American Space Frontier Committee.

3. That, in connection with the direct-mail fundraising solicitation program of American Space Frontier Committee, it became necessary for the Committee to provide the funds to pay postage for a planned mailing and that, upon inquiry, it was learned that such funds were not then available in the account of the Committee.

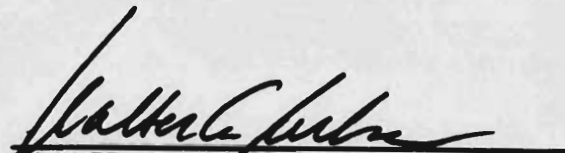
4. That Ann E. W. Stone and Associates, Inc. thereupon undertook to negotiate and assist with the processing of the

subject loan from The Palmer National Bank and, in so doing, presented the documents required by the Bank to General Graham for signature and then returned the signed documents to the Bank.

5. The signature of General Graham was a requirement of The Palmer National Bank, General Graham being the Chairman of American Space Frontier Committee.

6. That he had no knowledge of the fact that the Federal Election Campaign Act of 1971, as amended, and the Regulations thereunder of the Federal Election Commission contained provisions that would deem the loan proceeds to be the equivalent of a contribution from General Graham to American Space Frontier Committee and that, to the best of his knowledge, General Graham, other officers or employees of American Space Frontier Committee, individuals associated with the processing of the loan at The Palmer National Bank and other employees of Ann E. W. Stone and Associates, Inc. had no knowledge of such fact at the time the loan was processed and the proceeds thereof used in furtherance of the programs of the Committee.

IN WITNESS WHEREOF, this Affidavit was executed on the 27th day of January, 1986.


WALTER G. LUKENS

Sworn to before me this 27th
day of January, 1986.


Notary Public

My Commission Expires: August 22, 1988

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2121

NAME OF COUNSEL: Curtis Herge

ADDRESS: 8201 Greensboro Drive

McLean, VA 22102

TELEPHONE: (703) 848-4700

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.

January 27, 1986
Date


Signature

RESPONDENT'S NAME: Daniel O. Graham

ADDRESS: 2427 Fort Scott Drive

Arlington, VA 22202

HOME PHONE: (703) 684-7681

BUSINESS PHONE: (202) 737-4979

333305904068



Attachment 3

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

J. Curtis Herge, Esquire
Herge, Sparks, Christopher & Biondi
Suite 200
8201 Greensboro Drive
McLean, Virginia 22102

RE: MUR 2121
American Space Frontier
Committee and C. Monroe
Thomas, as treasurer;
Daniel Graham

Dear Mr. Herge:

On January 2, 1986, the Commission found reason to believe that the American Space Frontier Committee and C. Monroe Thomas, as treasurer, violated 2 U.S.C. § 441a(f) and that General Daniel Graham violated 2 U.S.C. § 441a(a)(1). At your request, the Commission determined on , 198 , to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed are conciliation agreements that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreements, please sign and return them along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible. If you have any questions or suggestions for changes in the agreements, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures

Rec. Aikens Office
1-30-86

CCC#9595

HERGE, SPARKS, CHRISTOPHER & BIONDI

ATTORNEYS AT LAW

SUITE 200

8201 GREENSBORO DRIVE
MCLEAN, VIRGINIA 22102

28 JAN 30 11:40

J. CURTIS HERGE
ROBERT R. SPARKS, JR.
A. MARK CHRISTOPHER
GEORGE V. BIONDI
DONNA LYNN MILLER

(703) 848-4700

January 28, 1986

The Honorable Joan D. Aikens
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D. C. 20463

Attention: Charles Snyder, Esq.
Office of General Counsel

RE: MUR 2121

Dear Madam Chairman:

This responds to your letter to me, dated January 14, 1986, in which you reported that the Federal Election Commission has determined there is reason to believe that our client, American Space Frontier Committee and its treasurer, may have violated 2 U.S.C. 441a(f) and 11 CFR 100.7(b)(11) in connection with a \$13,500.00 bank loan from The Palmer National Bank on or about February 6, 1984, which loan was repaid in full with interest on or about March 13, 1984. This letter also responds to your similar notification to General Daniel O. Graham, there being enclosed herewith a Statement of Designation of Counsel signed by General Graham.

This will serve to notify you, pursuant to 11 CFR 111.18(d), that our clients are interested in pursuing pre-probable cause conciliation in connection with this matter. In furtherance of an expedient resolution, we are submitting to you herewith the executed affidavits of General Graham and Mr. Walter G. Lukens, which explain that the loan in question was taken to provide funds for the direct-mail fundraising solicitation program of American Space Frontier Committee; and, that no individual associated with the transaction was aware of the fact that the loan proceeds would constitute a contribution from General Graham to the Committee. General Graham serves as the Chairman of American Space Frontier Committee and Mr. Lukens was, at the time, an employee of the firm which managed the direct-mail fundraising program of the Committee.

36 JAN 30 12:13

RECEIVED
GENERAL COUNSEL

The Honorable Joan D. Aikens
January 28, 1986
Page 2

86040590336

sbl

Enclosures

Sincerely yours,

A handwritten signature in dark ink, appearing to read "J. Curtis Herge". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

J. Curtis Herge

BEFORE THE FEDERAL ELECTION COMMISSION

AMERICAN SPACE FRONTIER
COMMITTEE,
Respondent

MUR 2121

AFFIDAVIT OF WALTER G. LUKENS

COMMONWEALTH OF VIRGINIA)
COUNTY OF FAIRFAX) to-wit:

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2. That, at the time the loan was made, he was employed by the firm, Ann E. W. Stone and Associates, Inc., which firm coordinated and managed the direct-mail fundraising solicitation program of American Space Frontier Committee; and, as such an employee, he served as the day-to-day supervisor and manager of the direct-mail account of American Space Frontier Committee.

3. That, in connection with the direct-mail fundraising solicitation program of American Space Frontier Committee, it became necessary for the Committee to provide the funds to pay postage for a planned mailing and that, upon inquiry, it was learned that such funds were not then available in the account of the Committee.

4. That Ann E. W. Stone and Associates, Inc. thereupon undertook to negotiate and assist with the processing of the

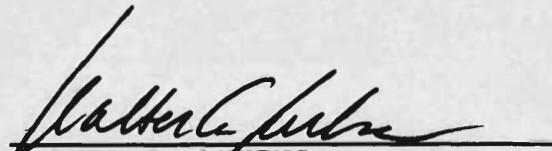
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subject loan from The Palmer National Bank and, in so doing, presented the documents required by the Bank to General Graham for signature and then returned the signed documents to the Bank.

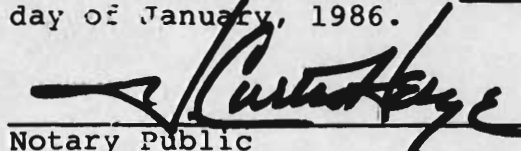
5. The signature of General Graham was a requirement of The Palmer National Bank, General Graham being the Chairman of American Space Frontier Committee.

6. That he had no knowledge of the fact that the Federal Election Campaign Act of 1971, as amended, and the Regulations thereunder of the Federal Election Commission contained provisions that would deem the loan proceeds to be the equivalent of a contribution from General Graham to American Space Frontier Committee and that, to the best of his knowledge, General Graham, other officers or employees of American Space Frontier Committee, individuals associated with the processing of the loan at The Palmer National Bank and other employees of Ann E. W. Stone and Associates, Inc. had no knowledge of such fact at the time the loan was processed and the proceeds thereof used in furtherance of the programs of the Committee.

IN WITNESS WHEREOF, this Affidavit was executed on the 27th day of January, 1986.


WALTER G. LUKENS

Sworn to before me this 27th
day of January, 1986.


Notary Public

My Commission Expires: August 22, 1988

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2121

NAME OF COUNSEL: Curtis Herge

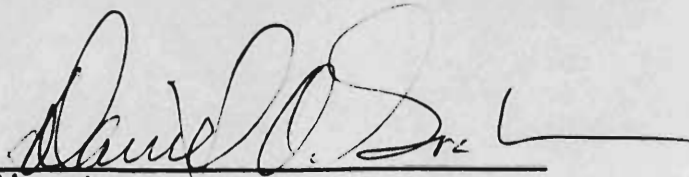
ADDRESS: 8201 Greensboro Drive

McLean, VA 22102

TELEPHONE: (703) 848-4700

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.

January 27, 1986
Date


Signature

RESPONDENT'S NAME: Daniel O. Graham

ADDRESS: 2427 Fort Scott Drive

Arlington, VA 22202

HOME PHONE: (703) 684-7681

BUSINESS PHONE: (202) 737-4979

96040590339

BEFORE THE FEDERAL ELECTION COMMISSION

AMERICAN SPACE FRONTIER
COMMITTEE,

Respondent

)
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)
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)
MUR 2121

AFFIDAVIT OF DANIEL O. GRAHAM

COMMONWEALTH OF VIRGINIA)
COUNTY OF FAIRFAX)

to-wit:

DANIEL O. GRAHAM, being duly sworn, deposes and says:

1. That he has personal knowledge of the facts relating to a loan made by The Palmer National Bank on or about February 6, 1984, in the amount of \$13,530.00, which loan is the subject of Matter Under Review 2121.

2. That he is Chairman of American Space Frontier Committee, a political committee subject to the provisions of the Federal Election Campaign Act of 1971, as amended.

3. That, at the time the loan was made, Ann E. W. Stone and Associates, Inc. was the firm engaged by American Space Frontier Committee to coordinate and manage the direct-mail fundraising solicitation program of American Space Frontier Committee.

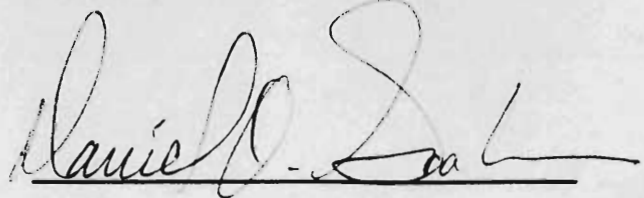
4. That Ann E. W. Stone and Associates, Inc. undertook to negotiate and assist with the processing of the subject loan from The Palmer National Bank to provide funds to pay postage for a planned mailing for American Space Frontier Committee, the requisite loan documents being presented to your deponent for signature by Walter G. Lukens, an employee of Ann E. W. Stone and

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Associates, Inc.

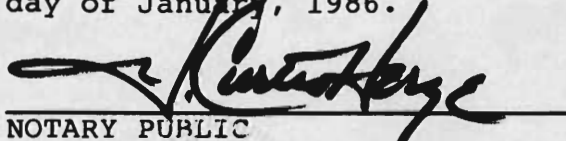
5. That he had no knowledge of the fact that the Federal Election Campaign Act of 1971, as amended, and the Regulations thereunder of the Federal Election Commission contained provisions that would deem the loan proceeds to be the equivalent of a contribution from your deponent to American Space Frontier Committee and that, to the best of his knowledge, no other officer or employee of American Space Frontier Committee, no individual associated with the processing of the loan at The Palmer National Bank and no employee of Ann E. W. Stone and Associates, Inc. had knowledge of such fact at the time the loan was processed and the proceeds thereof used in furtherance of the programs of the Committee.

IN WITNESS WHEREOF, this Affidavit was executed on the 27th day of January, 1986.



DANIEL O. GRAHAM

Sworn to before me this 27th
day of January, 1986.


NOTARY PUBLIC

My Commission Expires: August 22, 1988

86040590341



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 14, 1986

General Daniel Graham
2427 Ft. Scott Drive
Arlington, VA 22202

RE: MUR 2121
General Daniel Graham

Dear General Graham:

On January 2, 1986, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 100.7(b)(11) of the Commission's regulations. 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, along with your answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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General Daniel Graham
Page 2

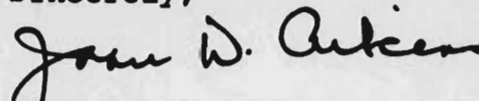
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Joan D. Aikens
Chairman

Enclosures

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

26040790343

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. _____

RESPONDENT General Daniel Graham

SUMMARY OF ALLEGATIONS

The Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on the grounds that the American Space Frontier Committee's ("ASF") 1984 April Quarterly Report disclosed receipt of a \$13,500 bank loan from the Palmer National Bank on February 6, 1984. The loan was repaid in full with interest on March 13, 1984. On July 1, 1985, ASF filed an amended 1984 April Quarterly Report, showing that the loan had been guaranteed by General Daniel Graham.

It appears that the guaranty of a \$13,500 loan to ASF constitutes a contribution to a political committee in excess of the limits established by the Federal Election Campaign Act ("the Act")

FACTUAL AND LEGAL ANALYSIS

The Act defines a contribution to include a loan, except for a bank loan "made in accordance with applicable law and in the ordinary course of business," except that such loan:

(I) shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors....

2 U.S.C. § 431(8)(B)(vii). See also 11 C.F.R. § 100.7(b)(11).

While it appears that the loan was made in the ordinary course of business, the fact that General Graham is listed as the sole guarantor of the loan would mean that he made a contribution of \$13,500 to ASF. This contribution exceeds the \$5,000 limit on

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individual contributions. 2 U.S.C. § 441a(a), 11 C.F.R.
§ 100.7(b)(11).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

General Daniel Graham
2427 Ft. Scott Drive
Arlington, VA 22202

RE: MUR
General Daniel Graham

Dear General Graham:

On January 2, 1986, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 100.7(b)(11) of the Commission's regulations. 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, along with your answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

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General Daniel Graham
Page 2

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Joan D. Aikens
Chairman

Enclosures

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



86040790347



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 14, 1986

J. Curtis Herge, Esquire
Sedam & Herge
8300 Greensboro Drive
Suite 1100
McLean Virginia 22102

RE: MUR 2121
American Space Frontier
Committee and C. Monroe
Thomas, as treasurer

Dear Mr. Herge:

On January 2, 1985, the Federal Election Commission determined that there is reason to believe that your client, American Space Frontier Committee and its treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 100.7(b)(11) of the Commission's regulation. 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, your client has an opportunity to demonstrate that no action should be taken against 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, along with answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your client and its treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

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Letter to J. Curtis Herge
Page 2

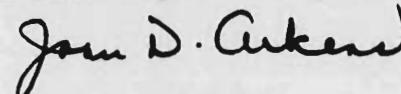
pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Joan D. Aikens
Chairman

Enclosures
General Counsel's Factual
and Legal Analysis
Procedures

86040590349



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

J. Curtis Herge, Esquire
Sedam & Herge
8300 Greensboro Drive
Suite 1100
McLean Virginia 22102

RE: MUR
American Space Frontier
Committee and C. Monroe
Thomas, as treasurer

Dear Mr. Herge:

On , 1985, the Federal Election Commission determined that there is reason to believe that your client, American Space Frontier Committee and its treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 100.7(b)(11) of the Commission's regulation. 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, your client has an opportunity to demonstrate that no action should be taken against 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, along with answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your client and its treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be

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Letter to J. Curtis Herge
Page 2

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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 Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Joan D. Aikens
Chairman

Enclosures
General Counsel's Factual
and Legal Analysis
Procedures

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GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. _____

RESPONDENT American Space Frontier Committee and C. Monroe Thomas, as treasurer

SUMMARY OF ALLEGATIONS

The Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on the grounds that the American Space Frontier Committee's ("ASF") 1984 April Quarterly Report disclosed receipt of a \$13,500 bank loan from the Palmer National Bank on February 6, 1984. The loan was repaid in full with interest on March 13, 1984. On July 1, 1985, ASF filed an amended 1984 April Quarterly Report, showing that the loan had been guaranteed by General Daniel Graham. RAD's efforts to obtain additional information concerning this transaction have proven unavailing.

It is alleged that the guaranty of a \$13,500 loan to ASF constitutes a contribution to a political committee in excess of the limits established by the Federal Election Campaign Act ("the Act") and that the acceptance of such an excessive contribution is also a violation of the Act.

FACTUAL AND LEGAL ANALYSIS

The Act defines a contribution to include a loan, except for a bank loan "made in accordance with applicable law and in the ordinary course of business," except that such loan:

(I) shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors....

2 U.S.C. § 431(8)(B)(vii). See also 11 C.F.R. § 100.7(b)(11).

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While it appears that the loan was made in the ordinary course of business, the fact that General Graham is listed as the sole guarantor of the loan would mean that he made a contribution of \$13,500 to ASF. This contribution exceeds the \$5,000 limit on individual contributions. 2 U.S.C. § 441a(a). ASF would have violated the Act by accepting an excessive contribution. 2 U.S.C. § 441a(f), 11 C.F.R. § 100.7(b)(11).

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

American Space Frontier Committee and)
C. Monroe Thomas, as treasurer;)
Daniel Graham)

RAD 85L-39

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on January 2, 1986, the Commission decided by a vote of 4-0 to take the followings actions in RAD 85L-39:

1. Find reason to believe the American Space Frontier Committee and C. Monroe Thomas, as treasurer, violated 2 U.S.C. § 441a(f).
2. Find reason to believe General Daniel Graham violated 2 U.S.C. § 441a(a) (1).
3. Approve and send the letters and General Counsel's Legal and Factual Analysis attached to the First General Counsel's Report signed December 23, 1985.

Commissioners Elliott, Harris, McDonald and McGarry voted affirmatively for this decision; Commissioners Aikens and Josefiak did not cast a vote.

Attest:

1-3-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:	Tues.,	12-24-85,	11:42
Circulated on 48 hour tally basis:	Thurs.,	12-26-85,	4:00
Deadline for vote:	Thurs.,	1-2-86,	4:00

86040590354



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Rd*
DATE: December 24, 1985
SUBJECT: RAD Ref. 85L-39 - First General Counsel's Rpt.

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 ☐
Sensitive ☐
Non-Sensitive ☐
Other ☐

DISTRIBUTION

Compliance ☒
Audit Matters ☐
Litigation ☐
Closed MUR Letters ☐
Status Sheets ☐
Advisory Opinions ☐
Other (see distribution below) ☐

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

85 DEC 24 AM : 42

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION:

RAD #85L-39

STAFF MEMBER: Snyder

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

RESPONDENT'S NAME: American Space Frontier Committee and
C. Monroe Thomas, as treasurer;
Daniel Graham

RELEVANT STATUTES: 2 U.S.C. §§ 441a(a)(1), 441a(f)
11 C.F.R. § 100.7(b)(11)

INTERNAL REPORTS
CHECKED:

ASF Reports

FEDERAL AGENCIES
CHECKED:

None

GENERATION OF MATTER

The Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on the grounds that the American Space Frontier Committee's ("ASF") 1984 April Quarterly Report disclosed receipt of a \$13,500 bank loan from the Palmer National Bank on February 6, 1984. The loan was repaid in full with interest on March 13, 1984. On July 1, 1985, ASF filed an amended 1984 April Quarterly Report, showing that the loan had been guaranteed by General Daniel Graham. RAD's efforts to obtain additional information concerning this transaction have proven unavailing.

SUMMARY OF ALLEGATIONS

It is alleged that the guaranty of a \$13,500 loan to ASF constitutes a contribution to a political committee in excess of

the limits established by the Federal Election Campaign Act ("the Act") and that the acceptance of such an excessive contribution is also a violation of the Act.

FACTUAL AND LEGAL ANALYSIS

The Act defines a contribution to include a loan, except for a bank loan "made in accordance with applicable law and in the ordinary course of business," except that such loan:

(I) shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors....

2 U.S.C. § 431(8)(B)(vii). See also 11 C.F.R. § 100.7(b)(11).

While it appears that the loan was made in the ordinary course of business, because General Graham is the sole guarantor of the loan would mean that he made an excessive contribution of \$8,500 to ASF in view of the \$5,000 limit on individual contributions under 2 U.S.C. § 441a(a). Consequently, ASF has also violated the Act by accepting the excessive contribution under 2 U.S.C. § 441a(f).

RECOMMENDATION

1. Find reason to believe the American Space Frontier Committee and C. Monroe Thomas, as treasurer, violated 2 U.S.C. & 441a(f).
2. Find reason to believe General Daniel Graham violated 2 U.S.C. § 441a(a)(1).

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3. Approve and send the attached letters and General Counsel's Legal and Factual Analysis.

Charles N. Steele
General Counsel

December 23, 1985
Date

BY: Kenneth A. Gross
Associate General Counsel

Attachments

1. Referral
2. Proposed letter to respondents
3. General Counsel's Legal and Factual Analysis

86040390358



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

19 September 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF AMERICAN SPACE FRONTIER COMMITTEE

This is a referral of the American Space Frontier Committee ("the Committee"). The Committee received an apparent excessive contribution in the form of a bank loan endorsed by an individual

If you have any questions, please contact Robyn Jameson at 523-4048.

Attachment

9530359

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 19 September 1984

ANALYST: Robyn Jameson

I. COMMITTEE: American Space Frontier Committee
(C00168468)
C. Monroe Thomas, Treasurer*/
(April 30, 1985 - present)
Peter Gemma Jr., Treasurer
(January 23, 1984-April 30, 1985)
Roy Beheler, Treasurer
(July 7, 1983 - January 23, 1984)
P.O. Box 1984
Merrifield, VA 22116

II. RELEVANT STATUTE: 2 U.S.C. §441a(f)
11 CFR 100.7(b)(11)

III. BACKGROUND:

Receipt of an Excessive Contribution in the Form of a Loan

The American Space Frontier Committee's ("the Committee") 1984 April Quarterly Report disclosed a \$13,500 bank loan incurred on February 6, 1984; however, Schedule C did not itemize any endorers or guarantors (Attachment 2). As noted on a supporting disbursement schedule, the loan was repaid in full with interest on March 13, 1984 (Attachment 3).

On July 1, 1985 the Committee filed an amended 1984 April Quarterly Report. Schedule C of the amendment disclosed only one guarantor for the loan, General Daniel Graham (Attachment 4). A Request for Additional Information was sent on August 7, 1985 noting the repayment of the loan, and informing the Committee of possible legal steps being taken concerning the acceptance of an excessive contribution (Attachment 5). Mr. C. Monroe Thomas, the Committee's treasurer, responded by letter on August 16, 1985, stating the matter had been referred to their lawyer, Curt Herge (Attachment 6).

*/ The Committee's 1985 30 Day Post-Runoff Report indicated a change in address from 7777 Leesburg Pike, Suite 307, Falls Church, Virginia 22043 to the above address.

86040590360

AMERICAN SPACE FRONTIER COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

The Reports Analysis Division ("RAD") analyst attempted to contact Mr. Thomas on September 4, 1985; however, the Committee's phone had been disconnected (Attachment 7). Later that day, the RAD analyst telephoned the office of Mr. Herge. The RAD analyst explained that the loan was considered an excessive contribution because there appeared to be only one guarantor. When the RAD analyst asked if there were additional guarantors, Mr. Herge replied the matter should be sent to the Office of General Counsel (Attachment 8).

On September 12, 1985, the RAD analyst obtained a new telephone number from directory assistance and called the Committee. Mr. Thomas was asked if General Graham had personally guaranteed the loan or if, as Chairman, he had guaranteed it on behalf of the Committee. Mr. Thomas stated he did not know, because he was not the Committee's treasurer at that time. He said he would check the records to see how the transaction had been conducted and send in a response (Attachment 9).

As of this date, the Committee has not submitted any additional information.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN SPACE FRONTIERS COMMITTEE CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID 8C00168468
1983	STATEMENT OF ORGANIZATION			11JUL83	3	83FEC/275/0387
	STATEMENT OF ORGANIZATION - AMENDMENT			25OCT83	3	83FEC/286/0012
	YEAR-END	121,325	118,991	30JUN83 -31DEC83	17	84FEC/294/2091
	YEAR-END - AMENDMENT	121,325	118,991	30JUN83 -31DEC83	20	84FEC/311/0768
	YEAR-END - AMENDMENT	-	-	30JUN83 -31DEC83	7	84FEC/313/1711
	YEAR-END - AMENDMENT	124,135	122,521	1JUL83 -31DEC83	24	85FEC/377/1113
	YEAR-END - AMENDMENT	124,135	122,521	30JUN83 -31DEC83	25	85FEC/385/3002
	REQUEST FOR ADDITIONAL INFORMATION			30JUN83 -31DEC83	2	84FEC/306/3172
	REQUEST FOR ADDITIONAL INFORMATION 2ND			30JUN83 -31DEC83	1	84FEC/311/2829
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	2	85FEC/385/0978
1984	STATEMENT OF ORGANIZATION - AMENDMENT			6FEB84	3	84FEC/295/4303
	MISCELLANEOUS REPORT			18JUL84 TO FEC	2	84FEC/323/0344
	APRIL QUARTERLY	76,372	41,015	1JAN84 -31MAR84	15	84FEC/313/0887
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	2	84FEC/319/1548
	APRIL QUARTERLY - AMENDMENT	97,011	87,912	1JAN84 -31MAR84	19	85FEC/377/1073
	APRIL QUARTERLY - AMENDMENT	97,011	87,912	1JAN84 -31MAR84	21	85FEC/385/5281
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	2	84FEC/318/3216
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	2	85FEC/385/0981
	JULY QUARTERLY	67,462	81,331	1APR84 -30JUN84	21	84FEC/328/0243
	JULY QUARTERLY - AMENDMENT	67,462	81,331	1APR84 -30JUN84	3	84FEC/349/0649
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	1	85FEC/366/0564
	JULY QUARTERLY - AMENDMENT	73,159	78,687	1APR84 -30JUN84	24	85FEC/377/1035
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	2	84FEC/351/3144
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR84 -30JUN84	1	84FEC/357/4712
	OCTOBER QUARTERLY	69,999	78,797	1JUL84 -30SEP84	20	84FEC/349/1308
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	1	85FEC/366/0563
	OCTOBER QUARTERLY - AMENDMENT	75,681	79,443	1JUL84 -30SEP84	19	85FEC/377/1093
	NOTICE OF FAILURE TO FILE			1JUL84 -30SEP84	1	84FEC/348/2051
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	1	84FEC/351/3147
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	4	84FEC/357/4520
	PRE-GENERAL	14,207	14,038	1OCT84 -17OCT84	8	84FEC/357/1068
	PRE-GENERAL - AMENDMENT	14,207	13,538	1OCT84 -17OCT84	4	85FEC/366/0565
	PRE-GENERAL - AMENDMENT	14,434	13,636	1OCT84 -17OCT84	12	85FEC/377/1060
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	1	85FEC/358/4412
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -17OCT84	2	85FEC/363/2212
	POST-GENERAL	21,128	23,206	18OCT84 -29NOV84	11	85FEC/362/0376
	POST-GENERAL - AMENDMENT	21,790	23,207	18OCT84 -26NOV84	11	85FEC/377/1011
	POST-GENERAL - AMENDMENT	21,128	23,656	18OCT84 -29NOV84	4	85FEC/368/1946
	NOTICE OF FAILURE TO FILE			18OCT84 -26NOV84	1	84FEC/357/4890
	1'ST LETTER INFORMATIONAL NOTICE			18OCT84 -29NOV84	1	85FEC/366/5120
	YEAR-END	11,097	7,147	27NOV84 -31DEC84	11	85FEC/363/4263
	YEAR-END - AMENDMENT	11,097	7,147	27NOV84 -31DEC84	3	85FEC/368/1486
	YEAR-END - AMENDMENT	11,691	7,148	27NOV84 -31DEC84	11	85FEC/377/1023
	1'ST LETTER INFORMATIONAL NOTICE			27NOV84 -31DEC84	1	85FEC/366/5116

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 10SEP85
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	1985 MISCELLANEOUS NOTICE FROM FEC			18JAN85	1	05FEC/360/3731
	TOTAL	417,239	0	413,003	0	350 TOTAL PAGES

Cash on Hand as of 12/31/84: \$5,346.15

Debts and Obligations Owed to the Committee as of 12/31/84: \$0

Debts and Obligations Owed by the Committee as of 12/31/84: \$53,200.57

All reports have been reviewed.

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 19SEP85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN SPACE FRONTIER COMMITTEE CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00168468
	1985 STATEMENT OF ORGANIZATION - AMENDMENT			9MAY85	3	85FEC/373/0313
	MID-YEAR REPORT	180,833	186,061	1JAN85 -30JUN85	29	85FEC/381/3570
	POST-RUN-OFF	20,140	19,279	1JUL85 -23AUG85	12	85FEC/386/4812
	TOTAL	200,973	0 205,340	0	44	TOTAL PAGES

Cash on Hand as of 8/23/85: \$978.47

Debts and Obligations Owed to the Committee as of 8/23/85:

\$0

Debts and Obligations Owed by the Committee as of 8/23/85:

\$64,063.75

All reports have been reviewed.

8 6 0 4 0 5 9 0 3 6 4

1984 APRIL QUARTERLY REPORT

SCHEDULE C
(Revised 2/83)

LOANS

Attachment 2

Page 1 of 2 for
 LINE NUMBER
 Use separate schedules
 for each numbered line

Name of Committee (in Full) American Space Frontier Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source Palmer National Bank 1057 K Street, N.W. Washington, D.C.		Original Amount of Loan \$13,530.00	Balance Outstanding at Close of This Period --0--
Station: ☐ Primary ☐ General ☐ Other (specify): POSTAGE		Cumulative Payments To Date \$13,678.09	
Terms: Date Incurred <u>2/5/84</u> Date Due <u>1/5/84</u> Interest Rate <u> </u> % (april) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Station: ☐ Primary ☐ General ☐ Other (specify)		Cumulative Payments To Date	
Terms: Date Incurred <u> </u> Date Due <u> </u> Interest Rate <u> </u> % (april) ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 4
 LINE NUMBER N
 (Also enter the schedule for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
American Space Frontier Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Falls Church Post Office Falls Church, VA 22043	postage	2/27/84	\$291.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	2/26/84	400.00
		3/8/84	300.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement (see pg. 4 item F)	Date (month, day, year)	Amount of Each Disbursement This Period
Palmer National Bank 1667 K Street, N.W. Washington, D.C. 20006	repayment of loan with interest	3/13/84	\$13,676.09
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Swift Mailing House 5170 Lawrence Place Hyattsville, MD 20781	direct mail fundraising	3/13/84	\$1,261.35
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Envelopes Unlimited 649 N. Horners Lane Rockville, MD 20850	printing	3/13/84	\$1,459.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Virginia Risdon 2251 Pimmit Drive Falls Church, VA 22043	salary	3/15/84	\$266.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Monroe Thomas 2348 Greenbrier Way Vienna, VA 22180	salary	1/28/84	\$750.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	2/10/84	750.00
		3/10/84	850.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Telepost, Inc. 1951 Kidwell Drive Vienna, VA 22180	direct mail fundraising	3/21/84	\$2,000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Channel Corp. 305 4th Street, N.E. Washington, D.C. 20002	fundraising services	1/4/84	\$2,000.00
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	1/5/84	1,782.50
		1/7/84	4,830.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
"	"	1/31/84	2,341.50
	Disbursement for: ☐ Primary ☐ General ☐ Other (specify):	2/8/84	783.00
		2/9/84	1,000.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page the line number only)			

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AMENDED 1984 APRIL QUARTERLY REPORT

SCHEDULE C
(Revised 3/83)

LOANS

Attachment 4
Page 1 of 1
LINE NUMBER 34
Use separate schedules
for each numbered line

Name of Committee (in Full) American Space Frontier Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source Palmer National Bank 1667 K Street, N.W. Washington, D.C. 20006		Original Amount of Loan 13,530.00	Cumulative Payments To Date 13,674.09
		Balance Outstanding at Close of This Period --	
Election: ☒ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred 2/7/84 Date Due 4/6/84 Interest Rate PRIME + 3/4%		☐ Secured	
Let All Endorsers or Guarantors (if any) to item A			
1. Full Name, Mailing Address and ZIP Code Gen. Daniel O. Graham 2427 Ft. Scott Drive Arlinton, VA 22202		Name of Employer High Frontier Occupation Assoc. Dir. Amount Guaranteed Outstanding \$ --	
2. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payments To Date
		Balance Outstanding at Close of This Period	
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred Date Due Interest Rate		☐ Secured	
Let All Endorsers or Guarantors (if any) to item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer Occupation Amount Guaranteed Outstanding \$	
TOTALS This Period This Page only			
TOTALS This Period All Pages in this line only			
Carry outstanding balances only to LINE 2, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RG-2

AUG 7 1985

C. Monroe Thomas, Treasurer
American Space Frontier Committee
7777 Leesburg Pike, Suite 307N
Falls Church, VA 22043

Identification Number: C00168468

Reference: April Quarterly Amended Report (1/1/84-3/31/84)

Dear Mr. Thomas:

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:

RM [-Your report discloses a contribution which appears to exceed the limitations of 2 U.S.C. §441a (pertinent portion attached). A loan, endorsement, or guarantee is included in the definition of a contribution under 2 U.S.C. §431(8)(A) and 11 CFR 100.7(a)(1)(i).]

The Commission notes the repayment of the loan, however, further legal steps may be taken concerning the acceptance of an excessive contribution.

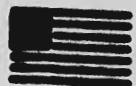
-The outstanding debt owed to Robert Dornan appears to be incorrect. FEC calculations disclose this amount to be \$15,000. Please provide the correct balance for this debt.

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

Robyn Winson
Reports Analyst
Reports Analysis Division

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American Space Frontier Committee

P. O. Box 1884, Norfolk, Virginia 23516



LT. General Daniel O. Graham, USA (Ret.)
Chairman

Mr. Robert K. Dornan
President

C. Monroe Thomas
Political Director

to "Provide for the
Common Defense"
from the High Frontier
of Space

August 11, 1985

FEC #C00169469

Ms. Robyn Jamison
Federal Election Commission
Washington, D.C.

Dear Ms. Jamison,

Regarding your letter last week concerning the American Space Frontier Committee's Federal Election Report for the first quarter of 1985, we have referred the loan problem to our lawyer Curt Herge of Sedam and Herge, McLean, Virginia.

The other problem on the debt statement was a typographical error. The amount of money incurred by the American Space Frontier Committee to Robert K. Dornan, should read \$15,000.00 instead of \$16,000.00. We are sorry we made a mistake.

If you have any questions, please feel free to give me a call at 790-0557.

Sincerely,

C. Monroe Thomas
Political Director

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ANALYST: James

CONVERSATION WITH: Mr. C Monroe Thomas

COMMITTEE: American Space Frontier Committee

DATE: 9/4/85

SUBJECT(S): Excessive Contribution

I attempted to contact Mr. C. Monroe Thomas, Treasurer of the Committee, concerning the loan which appeared to be an excessive contribution. The Committee's phone had been disconnected.

86040590370

ANALYST: James...

CONVERSATION WITH: Mr. Curt Herge

COMMITTEE: American Space Frontier Committee

DATE: 9/4/85

SUBJECT(S): Excessive Contribution

I telephoned the office of Mr. Curt Herge, the Lawyer for the Committee, to discuss the apparent excessive contribution. Mr. Herge was on another line and a message was left requesting he return my call.

When Mr. Herge phoned I explained that a loan was considered a contribution and therefore subject to limitations. I further explained if the loan had more than one guarantor the proportion each was liable for would be considered a contribution.

Mr. Herge then asked me if I was with the Reports Analysis Division. I told him that I was and he replied that I should send the matter to the Office of the General Counsel.

86040590371

ANALYST: Jameson

CONVERSATION WITH: Mr. C. Monroe Thomas

COMMITTEE: American Space Frontier Committee

DATE: 9/12/85

SUBJECT(S): Excessive Contribution

After obtaining the Committee's new telephone number from directory assistance, I telephoned Mr. C. Monroe Thomas, Treasurer of the committee.

I explained that I was calling in reference to the loan received in February of 1984. Mr. Thomas stated that after he became treasurer, it was discovered that the loan had been improperly disclosed and he had filed an amendment showing General Graham as guarantor.

I asked Mr. Thomas if General Graham had personally guaranteed the loan or if, as chairman, he had guaranteed it on behalf of the committee. He said that as he was not involved when the loan was made, he did not know, but would check his records and get back to me with the information.

86040590372

Attachment 2
(Part 1)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

General Daniel Graham
2427 Ft. Scott Drive
Arlington, VA 22202

RE: MUR
General Daniel Graham

Dear General Graham:

On , 1985, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 100.7(b)(11) of the Commission's regulations. 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, along with your answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

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.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must

86040590373

Ltr to General Daniel Graham
Page 2

be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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.

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 Charles Snyder, the attorney 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

86040590374



attachment 2
(part 2)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

J. Curtis Herge, Esquire
Sedam & Herge 8300 Greensboro Drive
Suite 1100
McLean Virginia 22102

RE: MUR
American Space Frontier
Committee and C. Monroe
Thomas, as treasurer

Dear Mr. Herge:

On , 1985, the Federal Election Commission determined that there is reason to believe that your client, American Space Frontier Committee and its treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 100.7(b)(11) of the Commission's regulation. 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, your client has an opportunity to demonstrate that no action should be taken against 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, along with answers to the enclosed questions, within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against your client and its treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may

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Letter to J. Curtis Herge
Page 2

complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

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 Charles Snyder, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

John Warren McGarry
Chairman

Enclosures
General Counsel's Factual
and Legal Analysis
Procedures

36040590376

Attachment 73
(part 1)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. _____

RESPONDENT American Space Frontier Committee and C. Monroe Thomas, as treasurer

SUMMARY OF ALLEGATIONS

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The Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on the grounds that the American Space Frontier Committee's ("ASF") 1984 April Quarterly Report disclosed receipt of a \$13,500 bank loan from the Palmer National Bank on February 6, 1984. The loan was repaid in full with interest on March 13, 1984. On July 1, 1985, ASF filed an amended 1984 April Quarterly Report, showing that the loan had been guaranteed by General Daniel Graham. RAD's efforts to obtain additional information concerning this transaction have proven unavailing.

It is alleged that the guaranty of a \$13,500 loan to ASF constitutes a contribution to a political committee in excess of the limits established by the Federal Election Campaign Act ("the Act") and that the acceptance of such an excessive contribution is also a violation of the Act.

FACTUAL AND LEGAL ANALYSIS

The Act defines a contribution to include a loan, except for a bank loan "made in accordance with applicable law and in the ordinary course of business," except that such loan:

(I) shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors....

2 U.S.C. § 431(8)(B)(vii). See also 11 C.F.R. § 100.7(b)(11).

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While it appears that the loan was made in the ordinary course of business, the fact that General Graham is listed as the sole guarantor of the loan would mean that he made a contribution of \$13,500 to ASF. This contribution exceeds the \$5,000 limit on individual contributions. 2 U.S.C. § 441a(a). ASF would have violated the Act by accepting an excessive contribution.

2 U.S.C. § 441a(f), 11 C.F.R. § 100.7(b)(11).

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Attachment 3
(part 2)

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR No. _____

RESPONDENT General Daniel Graham

SUMMARY OF ALLEGATIONS

The Reports Analysis Division ("RAD") referred this matter to the Office of General Counsel on the grounds that the American Space Frontier Committee's ("ASF") 1984 April Quarterly Report disclosed receipt of a \$13,500 bank loan from the Palmer National Bank on February 6, 1984. The loan was repaid in full with interest on March 13, 1984. On July 1, 1985, ASF filed an amended 1984 April Quarterly Report, showing that the loan had been guaranteed by General Daniel Graham.

It appears that the guaranty of a \$13,500 loan to ASF constitutes a contribution to a political committee in excess of the limits established by the Federal Election Campaign Act ("the Act")

FACTUAL AND LEGAL ANALYSIS

The Act defines a contribution to include a loan, except for a bank loan "made in accordance with applicable law and in the ordinary course of business," except that such loan:

(I) shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors....

2 U.S.C. § 431(8)(B)(vii). See also 11 C.F.R. § 100.7(b)(11).

While it appears that the loan was made in the ordinary course of business, the fact that General Graham is listed as the sole guarantor of the loan would mean that he made a contribution of \$13,500 to ASF. This contribution exceeds the \$5,000 limit on

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11-11-85

-2-

individual contributions. 2 U.S.C. § 441a(a), 11 C.F.R.
§ 100.7(b)(11).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 10, 1985

2121

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION:

FROM: SHAWN WOODHEAD
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: RR: 85L-39 AMERICAN SPACE FRONTIER COMMITTEE

Please review the attached Request for Additional Information which is to be sent to the American Space Frontier Committee for the 1985 Mid-Year report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 2:00 p.m. on Thursday, December 12, 1985. Thank you.

COMMENTS:

Attachment

86040590381



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charles S. Via, Treasurer
American Space Frontier Committee
P.O. Box 1984
Merrifield, VA 22116

Identification Number: C00168468

Reference: Mid-Year Report (1/1/85-6/30/85)

Dear Mr. Via:

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:

-Line 11a of the Detailed Summary Page discloses a figure for the total amount of contributions from individuals/persons other than political committees. In addition, the memo entry portion of the Detailed Summary Page is blank, and insufficient supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year, and/or provide a figure for the total amount of unitemized contributions from individuals/persons, which have been received during the reporting period. 11 CFR 104.3(a)(2).

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11a for each entry lacking a contributor's employer/occupation.

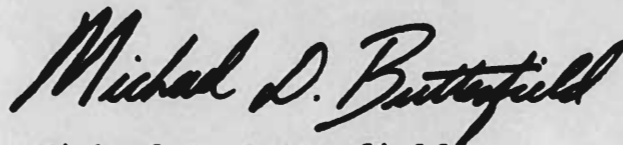
Note: If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributor, your committee may have exercised "best efforts." If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. 11 CFR 104.3(a)(4)(i) and 104.7.

86040590382

-Please clarify all expenditures made for postage, printing, direct mail and consulting fees. If a portion or all of these expenditures were made on behalf of specifically identified Federal candidates, they should be disclosed on Schedule A or E for Lines 21 and 22 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission 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 D. Butterfield
Reports Analyst
Reports Analysis Division

86040590383



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 10, 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

ATTENTION:

FROM: SHAWN WOODHEAD
SENIOR COMPLIANCE ANALYST
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: RR: 85L-39 AMERICAN SPACE FRONTIER COMMITTEE

Please review the attached Request for Additional Information which is to be sent to the American Space Frontier Committee for the 30 Day Post-General report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have should be forwarded to RAD by 2:00 p.m. on Thursday, December 12, 1985. Thank you.

COMMENTS:

Attachment

86040790384



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

Charles S. Via, Treasurer
American Space Frontier Committee
P.O. Box 1984
Merrifield, VA 22116

Identification Number: C00168468

Reference: 30 Day Post-General Report (7/1/85-8/23/85)

Dear Mr. Via:

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:

-The identification of each contributor, including the person's occupation and name of employer, must be provided if the person has contributed in excess of \$200 in the aggregate during the calendar year. Please amend Schedule A supporting Line 11a for each entry lacking a contributor's employer/occupation.

Note: If your committee has made at least one effort per solicitation, either by a written request or by an oral request documented in writing to obtain this information from the contributor, your committee may have exercised "best efforts." If you believe that your committee satisfies the "best efforts" provision, you should provide a copy of your solicitation or an explanation of the method(s) used to obtain contribution information. 11 CFR 104.3(a)(4)(i) and 104.7.

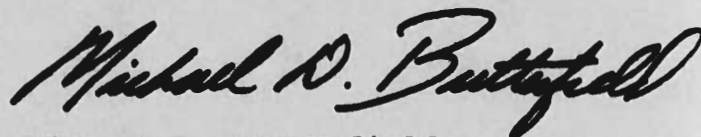
-Please clarify all expenditures made for postage, printing and consulting fees. If a portion or all of these expenditures were made on behalf of specifically identified Federal candidates, they should be disclosed on Schedule B or E for Lines 21 and 22 and include the amount, name, address and office sought by each candidate. 11 CFR 104.3(b) and 106.1.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need

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assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

A handwritten signature in cursive script that reads "Michael D. Butterfield". The signature is written in dark ink and is positioned above the typed name and title.

Michael D. Butterfield
Reports Analyst
Reports Analysis Division

86040590386



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

19 September 1985

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: JOHN D. GIBSON
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF AMERICAN SPACE FRONTIER COMMITTEE

This is a referral of the American Space Frontier Committee ("the Committee"). The Committee received an apparent excessive contribution in the form of a bank loan endorsed by an individual.

If you have any questions, please contact Robyn Jameson at 523-4048.

Attachment

86040590397

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 19 September 1984

ANALYST: Robyn Jameson

I. COMMITTEE:

American Space Frontier Committee
(C00168468)
C. Monroe Thomas, Treasurer*/
(April 30, 1985 - present)
Peter Gemma Jr., Treasurer
(January 23, 1984-April 30, 1985)
Roy Beheler, Treasurer
(July 7, 1983 - January 23, 1984)
P.O. Box 1984
Merrifield, VA 22116

II. RELEVANT STATUTE:

2 U.S.C. §441a(f)
11 CFR 100.7(b)(11)

III. BACKGROUND:

Receipt of an Excessive Contribution in the Form of a Loan

The American Space Frontier Committee's ("the Committee") 1984 April Quarterly Report disclosed a \$13,500 bank loan incurred on February 6, 1984; however, Schedule C did not itemize any endorsers or guarantors (Attachment 2). As noted on a supporting disbursement schedule, the loan was repaid in full with interest on March 13, 1984 (Attachment 3).

On July 1, 1985 the Committee filed an amended 1984 April Quarterly Report. Schedule C of the amendment disclosed only one guarantor for the loan, General Daniel Graham (Attachment 4). A Request for Additional Information was sent on August 7, 1985 noting the repayment of the loan, and informing the Committee of possible legal steps being taken concerning the acceptance of an excessive contribution (Attachment 5). Mr. C. Monroe Thomas, the Committee's treasurer, responded by letter on August 16, 1985, stating the matter had been referred to their lawyer, Curt Herge (Attachment 6).

*/ The Committee's 1985 30 Day Post-Runoff Report indicated a change in address from 7777 Leesburg Pike, Suite 307, Falls Church, Virginia 22043 to the above address.

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AMERICAN SPACE FRONTIER COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

The Reports Analysis Division ("RAD") analyst attempted to contact Mr. Thomas on September 4, 1985; however, the Committee's phone had been disconnected (Attachment 7). Later that day, the RAD analyst telephoned the office of Mr. Herge. The RAD analyst explained that the loan was considered an excessive contribution because there appeared to be only one guarantor. When the RAD analyst asked if there were additional guarantors, Mr. Herge replied the matter should be sent to the Office of General Counsel (Attachment 8).

On September 12, 1985, the RAD analyst obtained a new telephone number from directory assistance and called the Committee. Mr. Thomas was asked if General Graham had personally guaranteed the loan or if, as Chairman, he had guaranteed it on behalf of the Committee. Mr. Thomas stated he did not know, because he was not the Committee's treasurer at that time. He said he would check the records to see how the transaction had been conducted and send in a response (Attachment 9).

As of this date, the Committee has not submitted any additional information.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 10SEP85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILE COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN SPACE FRONTIERS COMMITTEE CONNECTED ORGANIZATION: NONE				NON-PARTY QUALIFIED		ID #C00168468
1983	STATEMENT OF ORGANIZATION			11JUL83	3	83FEC/275/0387
	STATEMENT OF ORGANIZATION - AMENDMENT			25OCT83	3	83FEC/286/0012
	YEAR-END	121,325	118,991	30JUN83 -31DEC83	17	84FEC/294/2091
	YEAR-END - AMENDMENT	121,325	118,991	30JUN83 -31DEC83	20	84FEC/311/0768
	YEAR-END - AMENDMENT	-	-	30JUN83 -31DEC83	7	84FEC/313/1711
	YEAR-END - AMENDMENT	124,135	122,521	1JUL83 -31DEC83	24	85FEC/377/1113
	YEAR-END - AMENDMENT	124,135	122,521	30JUN83 -31DEC83	25	85FEC/385/3002
	REQUEST FOR ADDITIONAL INFORMATION			30JUN83 -31DEC83	2	84FEC/306/3172
	REQUEST FOR ADDITIONAL INFORMATION 2ND			30JUN83 -31DEC83	1	84FEC/311/2829
	REQUEST FOR ADDITIONAL INFORMATION			1JUL83 -31DEC83	2	85FEC/385/0978
1984	STATEMENT OF ORGANIZATION - AMENDMENT			6FEB84	3	84FEC/295/4303
	MISCELLANEOUS REPORT			18JUL84 TO FEC	2	84FEC/323/0344
	APRIL QUARTERLY	76,372	41,015	1JAN84 -31MAR84	15	84FEC/313/0887
	APRIL QUARTERLY - AMENDMENT	-	-	1JAN84 -31MAR84	2	84FEC/319/1548
	APRIL QUARTERLY - AMENDMENT	97,011	87,912	1JAN84 -31MAR84	19	85FEC/377/1073
	APRIL QUARTERLY - AMENDMENT	97,011	87,912	1JAN84 -31MAR84	21	85FEC/385/5281
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	2	84FEC/318/3216
	REQUEST FOR ADDITIONAL INFORMATION			1JAN84 -31MAR84	2	85FEC/385/0981
	JULY QUARTERLY	67,462	81,331	1APR84 -30JUN84	21	84FEC/328/0243
	JULY QUARTERLY - AMENDMENT	67,462	81,331	1APR84 -30JUN84	3	84FEC/349/0649
	JULY QUARTERLY - AMENDMENT	-	-	1APR84 -30JUN84	1	85FEC/366/0564
	JULY QUARTERLY - AMENDMENT	73,159	78,687	1APR84 -30JUN84	24	85FEC/377/1035
	REQUEST FOR ADDITIONAL INFORMATION			1APR84 -30JUN84	2	84FEC/351/3144
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1APR84 -30JUN84	1	84FEC/357/4712
	OCTOBER QUARTERLY	69,999	78,797	1JUL84 -30SEP84	20	84FEC/349/1308
	OCTOBER QUARTERLY - AMENDMENT	-	-	1JUL84 -30SEP84	1	85FEC/366/0563
	OCTOBER QUARTERLY - AMENDMENT	75,681	79,443	1JUL84 -30SEP84	19	85FEC/377/1093
	NOTICE OF FAILURE TO FILE			1JUL84 -30SEP84	1	84FEC/348/2051
	REQUEST FOR ADDITIONAL INFORMATION			1JUL84 -30SEP84	1	84FEC/351/3147
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL84 -30SEP84	4	84FEC/357/4520
	PRE-GENERAL	14,207	14,038	1OCT84 -17OCT84	8	84FEC/357/1068
	PRE-GENERAL - AMENDMENT	14,207	13,538	1OCT84 -17OCT84	4	85FEC/366/0565
	PRE-GENERAL - AMENDMENT	14,434	13,636	1OCT84 -17OCT84	12	85FEC/377/1060
	REQUEST FOR ADDITIONAL INFORMATION			1OCT84 -17OCT84	1	85FEC/358/4412
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1OCT84 -17OCT84	2	85FEC/363/2212
	POST-GENERAL	21,128	23,206	18OCT84 -29NOV84	11	85FEC/362/0376
	POST-GENERAL - AMENDMENT	21,790	23,207	18OCT84 -26NOV84	11	85FEC/377/1011
	POST-GENERAL - AMENDMENT	21,128	23,656	18OCT84 -29NOV84	4	85FEC/368/1946
	NOTICE OF FAILURE TO FILE			18OCT84 -26NOV84	1	84FEC/357/4890
	1'ST LETTER INFORMATIONAL NOTICE			18OCT84 -29NOV84	1	85FEC/366/5120
	YEAR-END	11,097	7,147	27NOV84 -31DEC84	11	85FEC/363/4263
	YEAR-END - AMENDMENT	11,097	7,147	27NOV84 -31DEC84	3	85FEC/368/1486
	YEAR-END - AMENDMENT	11,691	7,148	27NOV84 -31DEC84	11	85FEC/377/1023
	1'ST LETTER INFORMATIONAL NOTICE			27NOV84 -31DEC84	1	85FEC/366/5116

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 10SEP85
PAGE 2

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	1985 MISCELLANEOUS NOTICE FROM FEC			18JAN85	1	85FEC/360/3731
	TOTAL	417,239	0	413,003	0	350 TOTAL PAGES

Cash on Hand as of 12/31/84: \$5,346.15

Debts and Obligations Owed to the Committee as of 12/31/84: \$0

Debts and Obligations Owed by the Committee as of 12/31/84: \$53,200.57

All reports have been reviewed.

1 6 2 0 6 2 0 7 0 9 8

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 19SEP85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
AMERICAN SPACE FRONTIER COMMITTEE						
CONNECTED ORGANIZATION:	NONE					
	1985 STATEMENT OF ORGANIZATION - AMENDMENT					
	MID-YEAR REPORT	180,833	186,061	9MAY85	3	85FEC/373/0313
	POST-SUM-OFF	20,140	19,279	1JAN85 -30JUN85	29	85FEC/381/3570
				1JUL85 -23AUG85	12	85FEC/386/4812
	TOTAL	200,973	0 205,340	0	44	TOTAL PAGES

Cash on Hand as of 8/23/85: \$978.47

Debts and Obligations Owed to the Committee as of 8/23/85:

\$0

Debts and Obligations Owed by the Committee as of 8/23/85:

\$64,063.75

All reports have been reviewed.

7 6 8 0 6 5 0 7 0 9 8

1984 APRIL QUARTERLY REPORT

Attachment 2

SCHEDULE C
(Revised 2/83)

LOANS

Page 1 of 1 for
LINE NUMBER _____
(Also reference schedule
for each numbered line)

Name of Guarantor (in full) American Space Frontier Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source Palmer National Bank 1067 K Street, N.W. Washington, D.C.		Original Amount of Loan \$13,530.00	Balance Outstanding at Close of This Period --0--
Election: ☐ Primary ☐ General ☐ Other (specify): POSTAGE			
Terms: Date Incurred 2/15/84 Date Due 1/5/84 Interest Rate _____ % (apri)		☒ Secured	
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify)			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apri)		☐ Secured	
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
SUBTOTALS This Period This Page (optional) _____			
TOTALS This Period (next page in this line only) _____			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 4
 LINE NUMBER 11
 (Also complete schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)
American Space Frontier Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Falls Church Post Office Falls Church, VA 22043	postage	2/27/84	\$291.00
	Disbursement for: ☐ Primary ☐ General	2/26/84	400.00
	☐ Other (specify):	3/8/84	300.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Palmer National Bank 1667 K Street, N.W. Washington, D.C. 20006	(see pg. 4 item F) repayment of loan with interest	3/13/84	\$13,678.09
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Swift Mailing House 5170 Lawrence Place Hyattsville, MD 20781	direct mail fundraising	3/13/84	\$1,261.35
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Envelopes Unlimited 649 N. Horners Lane Rockville, MD 20850	printing	3/13/84	\$1,459.00
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Virginia Risdon 2251 Pimmit Drive Falls Church, VA 22043	salary	3/15/84	\$266.00
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
C. Monroe Thomas 2348 Greenbrier Way Vienna, VA 22180	salary	1/28/84	\$750.00
	Disbursement for: ☐ Primary ☐ General	2/10/84	750.00
	☐ Other (specify):	3/10/84	850.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Telepost, Inc. 1951 Kidwell Drive Vienna, VA 22180	direct mail fundraising	3/21/84	\$2,000.00
	Disbursement for: ☐ Primary ☐ General		
	☐ Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Channel Corp. 305 4th Street, N.E. Washington, D.C. 20002	fundraising services	1/4/84	\$2,000.00
	Disbursement for: ☐ Primary ☐ General	1/5/84	1,782.50
	☐ Other (specify):	1/7/84	4,830.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
"	"	1/31/84	2,341.50
	Disbursement for: ☐ Primary ☐ General	2/8/84	783.00
	☐ Other (specify):	2/9/84	1,000.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (list page this line number only)			

AMENDED 1984 APRIL QUARTERLY REPORT

SCHEDULE C
(Revised 3/82)

LOANS

Attachment 4
Page 1 of 1
LINE NUMBER 34
(Use separate schedules
for each numbered line)

Name of Committee (in Full)			
American Space Frontier Committee			
A. Full Name, Mailing Address and ZIP Code of Loan Source	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Palmer National Bank 1667 K Street, N.W. Washington, D.C. 20006	13,530.00	13,674.09	--
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred <u>2/7/84</u> Date Due <u>4/6/84</u> Interest Rate <u>PRIME + 3/4%</u> ☐ Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
Gen. Daniel O. Graham	High Frontier		
2427 Ft. Scott Drive	Occupation		
Arlington, VA 22202	Assoc. Dir.		
	Amount Guaranteed Outstanding		
	\$ --		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		
B. Full Name, Mailing Address and ZIP Code of Loan Source			
	Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: ☐ Primary ☐ General ☐ Other (specify):			
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ %/yr ☐ Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		
2. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		
3. Full Name, Mailing Address and ZIP Code	Name of Employer		
	Occupation		
	Amount Guaranteed Outstanding		
	\$		
SUBTOTALS This Period This Page only: --			
TOTALS This Period Last Page in this line only: --			
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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AUG 7 1985

C. Monroe Thomas, Treasurer
American Space Frontier Committee
7777 Leesburg Pike, Suite 307N
Falls Church, VA 22043

Identification Number: C00168468

Reference: April Quarterly Amended Report (1/1/84-3/31/84)

Dear Mr. Thomas:

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:

LM [-Your report discloses a contribution which appears to exceed the limitations of 2 U.S.C. §441a (pertinent portion attached). A loan, endorsement, or guarantee is included in the definition of a contribution under 2 U.S.C. §431(8)(A) and 11 CFR 100.7(a)(1)(i).]

The Commission notes the repayment of the loan, however, further legal steps may be taken concerning the acceptance of an excessive contribution.

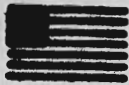
-The outstanding debt owed to Robert Dornan appears to be incorrect. FEC calculations disclose this amount to be \$15,000. Please provide the correct balance for this debt.

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

Robyn G. Johnson
Reports Analyst
Reports Analysis Division

06040590398
05033950981



American Space Frontier Committee

P. O. Box 1004, Manassas, Virginia 22110

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Li. General Daniel O. Graham, USA (Ret.)
Chairman

Mr. Robert K. Dornan
President

C. Monroe Thomas
Political Director

to "Provide for the
Common Defense"
from the High Frontier
of Space



August 11, 1985

FEC #C00168468

Ms. Robyn Jamison
Federal Election Commission
Washington, D.C.

Dear Ms. Jamison,

Regarding your letter last week concerning the American Space Frontier Committee's Federal Election Report for the first quarter of 1984, we have referred the loan problem to our lawyer Curt Herge of Sedam and Herge, McLean, Virginia.

The other problem on the debt statement was a typographical error. The amount of money incurred by the American Space Frontier Committee to Robert K. Dornan, should read \$14,000.00 instead of \$16,000.00. We are sorry we made a mistake.

If you have any questions, please feel free to give me a call at 790-0557.

Sincerely,

C. Monroe Thomas

C. Monroe Thomas
Political Director

ANALYST: Jimeson

CONVERSATION WITH: Mr. C Monroe Thomas

COMMITTEE: American Space Frontier Committee

DATE: ' 9/4/85

SUBJECT(S): Excessive Contribution

I attempted to contact Mr. C. Monroe Thomas, Treasurer of the Committee, concerning the loan which appeared to be an excessive contribution. The Committee's phone had been disconnected.

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ANALYST: Jameson

CONVERSATION WITH: Mr. Curt Herge

COMMITTEE: American Space Frontier Committee

DATE: 9/4/85

SUBJECT(S): Excessive Contribution

I telephoned the office of Mr. Curt Herge, the Lawyer for the Committee, to discuss the apparent excessive contribution. Mr. Herge was on another line and a message was left requesting he return my call.

When Mr. Herge phoned I explained that a loan was considered a contribution and therefore subject to limitations. I further explained if the loan had more than one guarantor the proportion each was liable for would be considered a contribution.

Mr. Herge then asked me if I was with the Reports Analysis Division. I told him that I was and he replied that I should send the matter to the Office of the General Counsel.

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ANALYST: Jimeson

CONVERSATION WITH: Mr. C. Monroe Thomas

COMMITTEE: American Space Frontier Committee

DATE: 9/12/85

SUBJECT(S): Excessive Contribution

After obtaining the committee's new telephone number from directory assistance, I telephoned Mr. C. Monroe Thomas, Treasurer of the committee.

I explained that I was calling in reference to the loan received in February of 1984. Mr. Thomas stated that after he became treasurer, it was discovered that the loan had been improperly disclosed and he had filed an amendment showing General Graham as guarantor.

I asked Mr. Thomas if General Graham had personally guaranteed the loan or if, as chairman, he had guaranteed it on behalf of the committee. He said that as he was not involved when the loan was made, he did not know, but would check his records and get back to me with the information.

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FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2121

Date Filmed 6/2/86 Camera No. --- 2

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