



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 2170

Date Filmed 2/2/87 Camera No. --- 2

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The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

     (1) Classified Information     (6) Personal privacy✓ (2) Internal rules and practices     (7) Investigatory files     (3) Exempted by other statute✓ (8) Banking information     (4) Trade secrets and commercial or financial information     (9) Well information (geographic or geophysical)✓ (5) Internal DocumentsSigned S. Garrdate 1/14/87

FEC 9-21-77

1/14/87

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 1, 1986

Ronald Ginsbach  
6901 A Esther Street  
Pensacola, Florida 32505

Re: MUR 2170

Dear Mr. Ginsbach:

The Federal Election Commission reviewed the allegations of your complaints dated April 21, 1986. These have been merged as MUR 2170. The Commission has determined that on the basis of the information provided in your complaint and information provided by the Respondents there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele  
General Counsel

*Lawrence M. Noble (Rht7)*

By Lawrence M. Noble  
Deputy General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 1, 1986

Robert Crongeyer, Esquire  
Beggs and Lane  
7th Floor, Blount Bldg.  
Pensacola, Florida 32576-2950

RE: MURs 2170  
Diana Rittenhouse  
Vince Whibbs

Dear Mr. Crongeyer:

On May 8, 1986, the Commission notified your clients, Vince Whibbs and Diana Rittenhouse, of complaints alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. These have been merged as MUR 2170.

The Commission, on September 16, 1986, determined that on the basis of the information in the complaints, and information provided by you on behalf of your clients, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele  
General Counsel

*Lawrence M. Noble (R)*  
By Lawrence M. Noble  
Deputy General Counsel

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Robert Crongeyer, Esquire  
Beggs and Lane  
7th Floor, Blount Bldg.  
Pensacola, Florida 32576-2950

RE: MURs 2170  
Diana Rittenhouse  
Vince Whibbs

Dear Mr. Crongeyer:

On May 8, 1986, the Commission notified your clients, Vince Whibbs and Diana Rittenhouse, of complaints alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. These have been merged as MUR 2170.

The Commission, on September 19, 1986, determined that on the basis of the information in the complaints, and information provided by you on behalf of your clients, there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele  
General Counsel

By Lawrence M. Noble  
Deputy General Counsel

LDW  
9/20/86

Ag 9/29/86

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FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Ronald Ginsbach  
6901 A Esther Street  
Pensacola, Florida 32505

Re: MUR 2170

Dear Mr. Ginsbach:

The Federal Election Commission reviewed the allegations of your complaints dated April 21, 1986. These have been merged as MUR 2170. The Commission has determined that on the basis of the information provided in your complaint and information provided by the Respondents there is no reason to believe that a violation of the Federal Election Campaign Act of 1971, as amended ("the Act") has been committed. Accordingly, the Commission has decided to close the file in this matter. The Federal Election Campaign Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Should additional information come to your attention which you believe establishes a violation of the Act, you may file a complaint pursuant to the requirements set forth in 2 U.S.C. § 437g(a)(1) and 11 C.F.R. § 111.4.

Sincerely,

Charles N. Steele  
General Counsel

By Lawrence M. Noble  
Deputy General Counsel

*TLN*  
*9/30/86*

*A. 9/29/86*

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )

Victory '84 Fund Co-chairmen, )  
Escambia County Republican )  
Executive Committee )

Diana Rittenhouse, Co-Chairman, )  
Victory '84 Fund )

Vince Whibbs, Sr., Co-Chairman, )  
Victory '84 Fund )

MURs 2168, 2169, and 2170

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of September 16, 1986, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions with respect to the above-captioned matters:

1. Merge MURs 2168, 2169, and 2170.
2. Find no reason to believe that the Republican Party of Florida -- Federal Campaign Committee, and Elise D. Biggs, as treasurer, violated the Federal Election Campaign Act, as amended.

(continued)

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3. Find no reason to believe that the Escambia County Republican Executive Committee violated 2 U.S.C. §§ 433 or 434.
4. Direct the Office of General Counsel to send appropriate letters pursuant to the above actions.

Commissioners Aikens, Elliott, Harris, Josefiah, and McGarry voted affirmatively for the decision; Commissioner McDonald was not present at the time of the vote.

Attest:

9-18-86

Date

Marjorie W. Emmons

Marjorie W. Emmons  
Secretary of the Commission

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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

86 AUG 2 P4:04

DATE AND TIME OF TRANSMITTAL  
BY OGC TO THE COMMISSION

MURS 2168, 2169, & 2170  
DATE COMPLAINT RECEIVED  
BY OGC April 22, 1986  
DATE OF NOTIFICATION TO  
RESPONDENT May 8, 1986  
STAFF MEMBER: Garr

COMPLAINANT'S NAME: Ronald E. Ginsbach

RESPONDENTS' NAMES: MUR 2168: Victory '84 Fund Co-chairmen  
Escambia County Republican  
Executive Comm.

MUR 2169: Diana Rittenhouse (Co-Chairman,  
Victory '84 Fund)

MUR 2170: Vince Whibbs, Sr. (Co-Chairman,  
Victory '84 Fund)

RELEVANT STATUTES: 2 U.S.C. §§ 432(h), 434(b), 433, 434  
11 C.F.R. § 103.2

INTERNAL REPORTS CHECKED: FEC Disclosure Documents

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

On April 25, 1986, the Commission received three identical complaints from Ronald E. Ginsbach alleging "improprieties of political contributions and improper accounting and reporting procedures of the Escambia County Victory '84 Fund ("Fund") and the Escambia County Republican Executive Committee Treasury ("Committee").<sup>1/</sup>

The complaints, sent simultaneously to the Commission and the Florida Department of State, Division of Elections, were

<sup>1/</sup> While the complaint names the "Escambia County Republican Executive Committee Treasury," it appears that Mr. Ginsbach is referring to the "Escambia County Republican Executive Committee"

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originally referred to the Supervisor of Elections, Escambia County.

According to Mr. Ginsbach, the Republican Party of the State of Florida instructed all County Committee Chairmen to set up separate segregated accounts for the Victory '84 Fund under the County Executive Committee.<sup>2/</sup>

The complainant has cited six questionable contributions which, he claims, may have been improperly collected, deposited and reported:

- 1) Three contributions (Bechtol, \$100; Elmore, \$100; and Dulion, \$250) which were designated for the Fund but were, instead, diverted to the Committee account;
- 2) Two contributions (\$500 and \$642) from the Republican Victory Fund which were deposited in the Committee account; and
- 3) A cash contribution of \$240.

<sup>2/</sup> Victory '84 appears to be a project of the Republican Party of Florida -- Federal Campaign Committee ("Florida Committee"). On March 7, 1985, the treasurer for the Republican Party of Florida -- Federal Campaign Committee responded to an RFAI, which questioned reimbursements to the Committee's state account. Included with the response was a copy of a "Dear Fellow American" letter signed by Ronald Reagan. The self-addressed, stamped solicitation card and envelope included with the letter, was from "Victory '84 c/o Republican Party of Florida." Further, the letter states that "... the Republican Party in Florida has organized a Victory '84 Committee."

After checking FEC disclosure documents and RAD and Audit there appears to be no evidence to link the Victory '84 Committee as a project of the Reagan-Bush Committee or the RNC.

This Office has been unable to obtain any information regarding a Victory '84 Fund established under the Escambia County Republican Executive Committee.

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Complainant contends these contributions were incorrectly deposited into the Committee treasury, that no reports had been filed, and that the expenditure of these funds only required the approval of two co-chairmen of the Fund, Diana Rittenhouse and Vince Whibbs. Because "thousands of dollars in contributions and expenditures have not been properly accounted for, reported, or spent" between March 1984 through March 31, 1985, he has requested that the Commission examine this matter.

On May 20, and June 4, 1986, the Commission received responses from counsel for Vince Whibbs and Diana Rittenhouse, respectively. According to counsel, Diana Rittenhouse serves as chairman of the Committee but was in no way affiliated with the treasury of the Victory '84 Fund.<sup>3/</sup> Vince Whibbs, who served as chairman of the Victory '84 campaign was the only individual authorized to handle the treasury of the Victory '84 Fund.

Counsel further explained that at the end of October, 1984, immediately prior to the election, Mr. Whibbs continued to receive contributions, although no further monies were being expended by the Fund. Because they were excessive campaign funds and in excess of any amount necessary to defray the campaign, they were transferred to the local Escambia County Republican Executive Committee ("Committee") account. The money was

<sup>3/</sup> Ms. Rittenhouse served as honorary co-chairman of the Reagan-Bush campaign in Escambia County.

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apparently used to pay for radio advertising sponsored by the local Republican Party.<sup>4/</sup>

Counsel also provided copies of the Escambia County Republican Executive Committee's deposit slips to the First American Bank of Pensacola. These include:

- 1) Deposit ticket dated October 9, 1984, confirming "a contribution of excessive funds from 'Victory '84' to the local Republican Party on October 19, 1984" which totalled \$620;
- 2) Deposit ticket dated October 26, 1984, reflecting a contribution by check from Terrell Bechtol for \$100 which "was payable to the Escambia County Republican Executive Committee directly";
- 3) Deposit ticket dated October 19, 1984, reflecting a \$100 contribution from B.F. Elmore which "was a payment to the local party to help defray the expenses of the radio advertising";
- 4) Deposit ticket dated November 1, 1984, "showing that Barbara M. Dunion also contributed \$250 to the party"; and
- 5) Deposit ticket dated January 2, 1985, "which reflects a final transfer of excess funds from 'Victory '84' to the local Escambia County Republican Executive Committee in the amount of \$642.00."<sup>5/</sup>

Counsel did not address the \$240 cash contribution.

<sup>4/</sup> Counsel provided a copy of a handwritten notation from the Committee's records showing the amounts of money spent on advertising to seven radio stations. It is unclear, however, whether the money was spent for local election campaigns or federal campaigns.

<sup>5/</sup> In discussing these deposits, Counsel has referred to the "local Republican Party," the "Escambia County Republican Executive Committee," and the "local party." We presume these all to mean the Escambia County Republican Executive Committee.

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LEGAL ANALYSIS

A. Republican Party of Florida -- Federal Campaign Committee

1) 2 U.S.C. § 432(h) and 11 C.F.R. § 103

Pursuant to 2 U.S.C. § 432(h) and 11 C.F.R. § 103, all political committees are required to deposit all receipts received by such committee into an account in a bank or other depository designated by such committee pursuant to 2 U.S.C. § 432(h)(1) and 11 CFR § 103.2. The treasurer of the committee shall make such deposits within 10 days of receipt. Finally, the committee shall make all disbursements by check or similar drafts drawn on an account at its designated campaign depository, except for expenditures of \$100 or less made from a petty cash fund maintained pursuant to 11 C.F.R. § 102.11 (See 11 C.F.R. § 103.3).

The complainant alleges that 3 individual checks, each payable to Victory '84, two contributions from the Victory '84 Fund totalling \$500 and \$642, and a \$240 cash contribution were directly deposited in the Committee account.

If the funds were designated for the Victory '84 Fund, they were required to be deposited directly into the depository account maintained for the Victory '84 Fund by the Florida Committee before being transferred pursuant to 11 C.F.R. § 110.3(c) to the Committee account.<sup>6/</sup> It appears that the

<sup>6/</sup> Pursuant to 11 C.F.R. § 110.3(b), transfers between and among political committees which are national, State, district, or local committees and subordinate committees, thereof, of the same political party are unlimited.

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Florida Committee may have violated 2 U.S.C § 432(h) and 11 C.F.R. § 103.2 by failing to deposit 3 individual checks totalling \$450 and a cash contribution totalling \$240 into its Victory '84 Fund account before transferring the funds to the Committee account.

2) 2 U.S.C. § 434(b)

Pursuant to 2 U.S.C. § 434(b), all political committees are required to disclose for the reporting period and calendar year, the total amount of all receipts and the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions aggregate in excess of \$200 within the calendar year. (See 2 U.S.C. § 434(b)(3)(A)). Additionally, 2 U.S.C. § 434(b)(5)(c) requires the reporting of each affiliated committee to which a transfer is made by the reporting committee during the reporting period. The Florida Committee's failure to report the transfer of funds from the Victory '84 Fund to the Committee and its failure to report the receipt of a \$250 contribution from Barbara Dunion appear to be in violation of 434(b).

B. Escambia County Republican Executive Committee

1) 2 U.S.C. §§ 433 and 434

2 U.S.C. § 431(4)(C) provides that any local committee of a political party shall be considered a political committee if it receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition

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of contribution or expenditure as defined in paragraphs (8) and (9) of this section aggregating in excess of \$5,000 per calendar year, or makes contributions or expenditures, aggregating in excess of \$1,000 per calendar year. A committee needs only to meet one of these standards to qualify as a "political committee."<sup>7/</sup>

Pursuant to 2 U.S.C. § 433, all political committees are required to file a Statement of Organization within 10 days after becoming a political committee within the definition of 2 U.S.C. § 431(4). The statement of organization shall include the name, address, relationship, and type of any connected or affiliated committee. 2 U.S.C. § 433(b)(2).

Further, 2 U.S.C. § 434 requires that each treasurer of a political committee file reports of receipts and disbursements in accordance with the provisions of the Act. More specifically, 2 U.S.C. § 434(b)(2)(F) requires that each report filed by the political committee disclose all transfers from affiliated committees and, where the reporting committee is a political party committee, transfers from other political party committees, regardless of whether such committees are affiliated.

<sup>7/</sup> Counsel has documented \$1,444.70 in expenditures to local radio stations "to pay for radio advertising on area radio station ads sponsored by the local Republican Party." This Office is unaware of whether these radio spots were done on behalf of local or federal candidates. Further, this Office is unaware of whether other expenditures, if any, may have been made by the Committee with respect to federal campaigns.

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It is the view of the Office of General Counsel that there is sufficient evidence to suggest that the Escambia County Republican Executive Committee was required to register and to report as a political committee, based upon their alleged receipt and deposit of funds designated for the Victory '84 Fund. This Office, then, recommends that the Commission find reason to believe that the Committee violated 2 U.S.C. §§ 433 and 434 and send appropriate questions to the Committee to determine whether it qualifies as a political committee subject to the registering and reporting requirements of the Act.

The Office of General Counsel recommends taking no action at this time with respect to the Co-Chairmen of the Escambia County Republican Executive Committee, Diana Rittenhouse and Vince Whibbs, pending receipt of information concerning the identity of the treasurer of that committee. However, because this Office has been unable to determine who serves as treasurer of the Escambia County Republican Executive Committee, this Office recommends that Mr. Whibbs be sent the appropriate questions on behalf of the Committee.

RECOMMENDATION

The Office of General Counsel recommends that the Commission:

1. Merge MURs 2168, 2169, & 2170;
2. Find reason to believe that the Republican Party of Florida -- Federal Campaign Committee, and Elise D. Biggs, as treasurer, violated 2 U.S.C. § 432(h) and 11 C.F.R. § 103;

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3. Find reason to believe that the Republican Party of Florida -- Federal Campaign Committee and Elise D. Biggs, as treasurer, violated 2 U.S.C. § 434(b);
4. Find reason to believe that the Escambia County Republican Executive Committee violated 2 U.S.C. § 433.
5. Find reason to believe that the Escambia County Republican Executive Committee violated 2 U.S.C. § 434;
6. Approve and send the attached letters and questions.

Charles N. Steele  
General Counsel

Date

8/25/86

By:

Lawrence M. Noble  
Deputy General Counsel

Attachments

1. Complaints
2. Responses
3. Proposed letters and questions

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**BEGGS & LANE**  
ATTORNEYS AND COUNSELLORS AT LAW  
SEVENTH FLOOR BLOUNT BUILDING  
PENSACOLA, FLORIDA

ROBERT P. GAINES  
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JOHN P. WINGHAM  
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RALPH A. PETERSON  
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GARY B. LEUCHTMAN  
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POST OFFICE BOX 12250  
PENSACOLA, FLORIDA 32576-2250  
TELEPHONE (904) 432-2451

E. GINIE BEGGS  
of Counsel

BERT H. LANE  
1917-1981

May 13, 1986

Ms. Shelley Garr  
Staff Counsel  
Federal Election Commission  
1325 K Street, NW  
Washington, D.C. 20463

Re: Complaint Numbers 2168/2169

Dear Ms. Garr:

Thank you for your courtesy and cooperation in speaking with me on the phone yesterday. Please find attached a signed statement of designation of counsel executed by Diana A. Rittenhouse, who is now, and has been for a considerable period of time, chairman of the Escambia County Republican Executive Committee. I am appearing at this point specifically on behalf of Mrs. Rittenhouse to respond to these charges brought by Ronald E. Ginsbach a Republican Precinct Committeeman here in Escambia County.

At the outset, however, you should note that we already at this juncture have responded to an inquiry from the Florida Department of State, Division of Elections, with respect to earlier spurious claims brought by Mr. Ginsbach. I am attaching a copy of my letter of April 24, 1986, addressing the allegations presented by Mr. Ginsbach to the State of Florida which are entirely devoid of merit. I have recommended to the State of Florida that Mr. Ginsbach be reported to the office of the State Attorney for this Circuit for prosecution under Florida Statute 106.25(6) which makes it a misdemeanor in the first degree in the State of Florida to file a complaint with the Division of Elections knowing the allegations of the complaint to be false or without merit. I assume that the Division of Elections is presently giving consideration to referral to that matter to the office of the State Attorney for the First Judicial Circuit for prosecution of Mr. Ginsbach. Furthermore, at the outset I should mention on the issue of motivation, Mr. Ginsbach is a disappointed local political activist, who has verbally openly threatened to cause trouble for Mrs. Rittenhouse if she did not voluntarily agree to step down as Escambia County Republican Executive Committee

16 MAY 20 AM 10

GENERAL COUNSEL

IC(1)

Ms Shelley Garr

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May 13, 1986

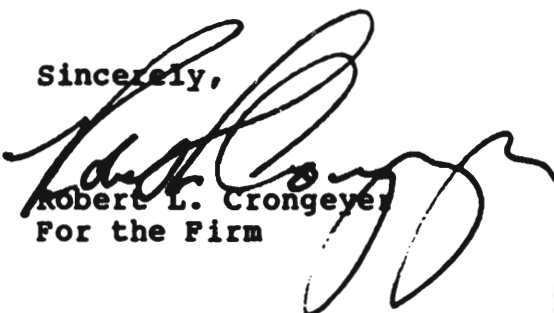
Chairman of Escambia County.

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With that background, I wish to turn to addressing the questions raised in Mr. Ginsbach's letter concerning contributions to the Republican Executive Committee Treasury. In the first place, Mr. Ginsbach is completely erroneous when he alleges that Mrs. Rittenhouse was "Victory '84 Co-Chairman." Mrs. Rittenhouse was never, at any time, co-chairman of "Victory '84." Neither has Mrs. Rittenhouse ever served as Treasurer of the Escambia County Republican Executive Committee. Evidently, as the presidential election approached in October, 1984, a number of contributions to "Victory '84" continued to be made to that fund by persons wishing to support the Republican Reagan-Bush ticket. It is my understanding that monies which were not expended on the campaign by "Victory '84" could be donated to any cause, and I would surmise the most suitable cause was found to be the local Republican Party. I do not know whether there are any restrictions on the local Republican Party being able to accept contributions, anonymous or not, from any source. But I gather that the local Republican Committee should be free to spend its treasury as it sees fit.

I can assure you, as counsel for Mrs. Rittenhouse, Chairman of the Escambia County Republican Executive Committee, that no impropriety was ever intended, and we certainly hope none has occurred. Mrs. Rittenhouse, of course, receives no compensation whatsoever for her many hours of volunteer effort and she certainly would not attempt to violate the law in any manner. If there are any further questions or wish to discuss this matter further, please contact me here in Pensacola at the letterhead telephone number. Again, I certainly appreciate the courtesy and your cooperation you extended me when I spoke to you on the phone earlier this morning.

Sincerely,

  
Robert L. Crongeyer  
For the Firm

RLC/pla

Enclosure

Copy of Robert L. Crongeyer letter/4-24-86  
Signed Statement of Designation of Counsel

I(2)



April 24, 1986

Mr. Garrett E. Spitzer, Investigator  
Florida Department of State  
Division of Elections  
Room 1801, the Capitol  
Tallahassee, Florida 32301

Re: Dianna Rittenhouse; complaint alleging  
violations of Chapter 106.07(4)(a)

Dear Garrett:

Thank you for speaking with me Tuesday about the above matter. After talking with you, I phoned Mrs. Rittenhouse, who of course, was very upset and distraught about Mr. Ginsbach's allegations. After I talked with her, however, she was able to contact the Escambia County Republican Committee Secretary, who, in turn, was able to retrieve from the local party files the original ticket stubs filled out by those persons who paid cash to attend the dinner for Senator Paula Hawkins here in Pensacola last year.

The first attachment to our response is a copy of a letter dated April 13, 1985, addressed to Joe Oldmixon, supervisor of elections here in Escambia County, which lists the names of those in question. I have also attached a xerox copy of the ticket stubs filled out personally by these individuals who attended the dinner. I stress that the ticket stubs were filled out by these ticket purchasers in their own handwriting.

Also, the local party has maintained a record of the names of the persons who had been provided tickets to sell and the serial numbers of the tickets each of the sellers had in his or her respective possession. Accordingly, from review of the records we have ascertained the following:

Ticket #38 was sold by Mary MacNeil to R.T. Russell;  
Ticket #52 was sold at the door by Jewel Bradfield to Ruby  
Butler;

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Garrett E. Spitzer

-2-

April 24, 1986

Tickets #60 and #61 were sold by Jackie Thornhill to Harold J. Burkhart and his wife, Charlotte;  
Tickets #102 and #103 were sold by Dub Hampton to himself and his wife;  
Ticket #117 was sold at the door by Jewel Bradfield to Mrs. Schifferbauer, and  
Ticket #338 was sold by Vince Whibbs to Richard Gibbs.

Again, each of the purchasers of these tickets to the dinner for Senator Hawkins wrote out their own ticket stubs. We have the originals of each of these stubs if you would like to examine them more closely. I am certain, however, that each of these people will verify that they did, in fact, buy tickets to the dinner for Senator Hawkins, paying the amounts reflected, which does account for all the monies received. Frankly, I do not understand how Mr. Ginsbach in good faith could make any kind of allegations that these reports were "fictitious" or "falsified" in some manner to cover illicit cash contributions of some kind. I note that F.S. 106.25(6) makes it a misdemeanor of the first degree, punishable by imprisonment up to one year and a fine of up to one thousand dollars (\$1,000.00), for filing a complaint knowing the allegations contained in it to be false or without merit. I sincerely suggest that some follow-up with the office of the State Attorney here may be merited in light of the patently malicious and purely frivolous and harrassing nature of these allegations.

Also, as I indicated on the phone, while Mrs. Rittenhouse was honorary co-chairman of the Reagan-Bush campaign in Escambia County, she was in no way affiliated with the treasury of the "Victory '84" fund which was a federally registered PAC set up on a nationwide basis. The Honorable Vince Whibbs, Mayor of Pensacola, certainly scrupulous and highly ethical individual, was the sole individual authorized to handle the treasury of "Victory '84" funds.

I hope that you will agree that we have responded fully and fairly to your inquiry with respect to the alleged section 106.07

I(4)



Garrett E. Spitzer

-3-

April 24, 1986

violation on the part of Mrs. Rittenhouse and I am confident that you will agree that this complaint is utterly baseless and frivolous. As I mentioned, Mrs. Rittenhouse has been most concerned and anxious about these allegations, as I am sure you can appreciate, and we would be grateful if you could let us know as soon as is reasonably possible if you concur with our suggestion that the violation claim is without merit.

Again, I certainly appreciate your courtesy and cooperation in discussing this matter with me over the phone yesterday and again, I trust we have fairly answered the questions which were raised.

With personal best regards, I remain

Sincerely,

Robert L. Crongeyer  
For the Firm

RLC/pla

cc: Dianna Rittenhouse

Enclosure

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I(5)

**STATEMENT OF DESIGNATION OF COUNSEL**

**FILE** 2168/2170  
**NAME OF COUNSEL:** Robert L. Crongeyer, Beggs & Lane  
**ADDRESS:** 700 Blount Building  
P.O. Box 12950  
Pensacola, Florida 32576  
**TELEPHONE:** (904) 432-2451

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.

5/13/86

**Date**

Diana Rittenhouse  
**Signature**

**RESPONDENT'S NAME:** Diana Rittenhouse  
**ADDRESS:** 6234 Appomattox Drive  
Pensacola, Florida 32503  
**HOME PHONE:** 476-3879  
**BUSINESS PHONE:** 474-0255

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**BEGGS & LANE**  
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E. DIXIE BEGGS  
of Counsel  
BERT H. LANE  
1917-1981

May 28, 1986

Ms. Shelley Garr  
Staff Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2168, MUR 2170

Dear Ms. Garr:

Attached please find the original statements of designation of counsel in MUR 2168 and MUR 2170, which have been signed by the respondent Vince Whibbs, Sr.

In reply to the allegations against Mr. Whibbs brought by Ronald E. Ginsbach of Pensacola, as I indicated to you in my letter replying to the complaints Mr. Ginsbach brought against another respondent, Mrs. Diana Rittenhouse, Chairman of the Escambia County Republican Executive Committee, I believe that Mr. Ginsbach's letters are politically motivated. Indeed, Mr. Ginsbach has openly told Mr. Whibbs, who is the Mayor of Pensacola, that unless Mr. Whibbs saw to it that Mrs. Rittenhouse was removed as local Escambia County Chairman, Mr. Ginsbach would cause "trouble."

As I indicated in my letter of May 13, 1986, with respect to the Rittenhouse situation, we have requested the Florida Department of State, Division of Elections, to refer the prior matter to the Office of the State Attorney for this Circuit so that Mr. Ginsbach can be prosecuted under Florida Statute 106.25(6) which makes it a misdemeanor of the first degree in the State of Florida to file a complaint with the Division of Elections, knowing the allegations of the complaint to be false or without merit. Nonetheless we will try to respond to these additional charges against Mr. Whibbs.

Vince Whibbs was Chairman of the "Victory '84" campaign here in Escambia County and received contributions toward the "Victory '84" campaign. At the end of October, 1984, immediately prior to the election, the checks continued to come in to Mr. Whibbs, although no further monies were being expended by "Victory '84"

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May 28, 1986

on the campaign. Because these were "excess campaign funds" which Mr. Whibbs determined to be in excess of any amount necessary to defray the campaign, they were transferred to the local Escambia County Republican Executive Committee. Ultimately the money was spent to pay for radio advertising on area radio stations ads sponsored by the local Republican Party. Attached as Exhibit "A" is a handwritten notation from the committee's records showing amounts of money spent on advertising with these radio stations by the Escambia County Republican Executive Committee.

Exhibit "B" is a copy of a deposit slip to the First American Bank of Pensacola, dated October 9, 1984, confirming that there was a contribution of excess funds from "Victory '84" to the local Republican Party on October 19, 1984.

Exhibit "C" is a copy of a deposit slip, dated October 26, 1984, showing that there was contribution by check from Mr. Terrell Bechtol in the amount of \$100.00 which contribution was payable to the Escambia County Republican Executive Committee directly and also used to help pay for these radio ads.

Exhibit "D" is a copy of a deposit slip dated October 19, 1984, showing a contribution from Mr. B.F. Elmore in the amount of \$100.00, which again was a payment to the local party to help defray the expenses of the radio advertising.

Exhibit "E" is a copy of another deposit slip, dated November 1, 1984, showing that Mrs. Barbara M. Dunion also contributed \$250.00 to the party, also to help defray the costs of the radio advertising.

The final item Exhibit "F", is a copy of a deposit slip dated January 2, 1985, which reflects a final transfer of excess funds from "Victory '84" to the local Escambia County Republican Executive Committee in the amount of \$642.00.

Vince Whibbs is a dedicated and energetic citizen who volunteered to serve in the capacity of "Victory '84" Chairman. He did not receive any compensation whatsoever for his efforts. My own research into this matter leads me to conclude that a situation such as this is covered by the Provisions of Title 2, United States Code, Section 439a, and by 11 CFR 113.2(c). The Code of Federal Regulations, Section 113.2, provides in pertinent part as follows:

I (8)

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Ms. Shelley Garr

-3-

May 28, 1986

"Excess campaign funds donated:

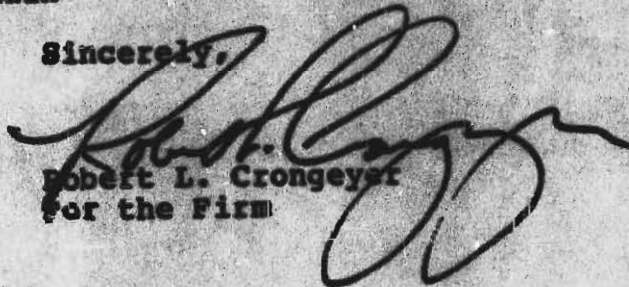
...

(c) may be transferred without limitation to any National state or local committee, or any political party;"

We respectfully and sincerely submit that Mr. Whibbs has done absolutely nothing wrong and to the contrary, he has attempted to comply with the letter of the law in every respect. I sincerely appreciate your courtesy and cooperation when I spoke with you last week on the phone and if there is anything further we could do, or need to do, please let us know. I hope you will concur with our assessment that these allegations of Mr. Ginsbach's are totally devoid of merit.

With best wishes, I remain

Sincerely,



Robert L. Crongeyer  
For the Firm

cc: Vince Whibbs

Enclosures

Exhibits A-F

Affidavit

87040534489

I (9)

STATEMENT OF DESIGNATION OF COUNSEL

NUR 2170 / 2168

NAME OF COUNSEL: Robert L. Crongever, Esq.

ADDRESS: P.O. Box 12950

Pensacola, Fla. 32576

TELEPHONE: 904-432-2451

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.

5-19-86  
Date

Vince Whibbs  
Signature

RESPONDENT'S NAME: Vince Whibbs

ADDRESS: 3201 Navy Blvd.

Pensacola, Fla. 32505

HOME PHONE: 904-432-9724

BUSINESS PHONE: 904-434-3044

T(10)

87040634490



10-30-01

Chas. Sutton - 478-7283

Ed

|              |        |
|--------------|--------|
| ✓ WKBH Radio | 198.50 |
| ✓ WBSR       | 104.00 |
| ✓ WJLQ       | 302.00 |
| ✓ WMEZ       | 231.20 |
| ✓ WHYM       | 90.00  |
| ✓ WCOA       | 304.00 |

---

1,186.70  
255.

---

WOWW

Money

For

Advertising

Alvin F. W. ~~Smith~~ Riley  
one Alvin V. A.

Exhibit "A"

I(11).

87040634491

THE FIRST AMERICAN BANK  
OF PENSACOLA  
PENSACOLA, FLORIDA 32503

DATE Oct 19 19 54  
CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE  
TERMS AND CONDITIONS OF THIS BANK'S COLLECTION AGREEMENT

| CURRENCY                      | DOLLARS                                          | CENTS     |
|-------------------------------|--------------------------------------------------|-----------|
| COINS                         |                                                  |           |
| PLEASE LIST CHECKS SEPARATELY |                                                  |           |
| 1. <u>WE2 B</u>               | <u>25</u>                                        | <u>00</u> |
| 2. <u>CAMP</u>                | <u>50</u>                                        | <u>00</u> |
| 3. <u>BURNS</u>               | <u>10</u>                                        | <u>00</u> |
| 4. <u>VICTORY 84</u>          | <u>50</u>                                        | <u>00</u> |
| 5                             |                                                  |           |
| 6                             |                                                  |           |
| 7                             |                                                  |           |
| 8                             | <i>"Lumped<br/>as<br/>contributions<br/>600"</i> |           |
| 9                             |                                                  |           |
| 10                            |                                                  |           |
| 11                            |                                                  |           |
| 12                            |                                                  |           |
| 13                            |                                                  |           |
| 14                            |                                                  |           |
| 15                            |                                                  |           |
| 16                            |                                                  |           |
| 17                            |                                                  |           |
| 18                            |                                                  |           |
| 19                            |                                                  |           |
| 20                            |                                                  |           |
| 21                            |                                                  |           |
| 22                            |                                                  |           |
| 23                            |                                                  |           |
| 24                            |                                                  |           |
| TOTAL AMT.<br>FROM OTHER SIDE |                                                  |           |
| TOTAL                         | <u>6</u>                                         | <u>00</u> |

DEPOSIT FOR CREDIT OF \$5.00 to Dix County & Public  
Executive Committee

TOTAL \$5.00

AMERICAN BANK STATIONERY CO. 6405

USE REVERSE SIDE FOR ADDITIONAL ITEMS.

Exhibit "B"

I(12)

87040634492



**THE FIRST AMERICAN BANK  
OF PENSACOLA  
PENSACOLA, FLORIDA 32503**

DATE May 26 1961

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE  
TERMS AND CONDITIONS OF THE BANK'S COLLECTION AGREEMENT

DEPOSIT FOR CREDIT OF

*Escambia County Republican  
Executive Committee*

| CURRENCY                      | DOLLARS    | CENTS     |
|-------------------------------|------------|-----------|
| COINS                         |            |           |
| PLEASE LIST CHECKS SEPARATELY |            |           |
| 1 <i>L...</i>                 | <i>10</i>  | <i>00</i> |
| 2 <i>PILKRON</i>              | <i>10</i>  | <i>00</i> |
| 3 <i>VEAL</i>                 | <i>25</i>  | <i>00</i> |
| 4 <i>DUNN</i>                 | <i>100</i> | <i>00</i> |
| 5 <i>HATTAWAY</i>             | <i>50</i>  | <i>00</i> |
| 6                             |            |           |
| 7                             |            |           |
| 8                             |            |           |
| 9                             |            |           |
| 10                            |            |           |
| 11                            |            |           |
| 12                            |            |           |
| 13                            |            |           |
| 14                            |            |           |
| 15                            |            |           |
| 16                            |            |           |
| 17                            |            |           |
| 18                            |            |           |
| 19                            |            |           |
| 20                            |            |           |
| 21                            |            |           |
| 22                            |            |           |
| 23                            |            |           |
| 24                            |            |           |
| TOTAL AMT.<br>FROM OTHER SIDE |            |           |
| TOTAL                         | <i>325</i> | <i>00</i> |

TOTAL

*\$375.00*

AMERICAN BANK STATIONERY CO. 8405

USE REVERSE SIDE FOR ADDITIONAL ITEMS.

Exhibit "C" I(13)

THE FIRST AMERICAN BANK  
OF PENSACOLA  
PENSACOLA, FLORIDA 32501

DATE Oct 27 1961  
CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE  
TERMS AND CONDITIONS OF THIS BANK'S COLLECTION AGREEMENT

DEPOSIT FOR CREDIT OF Escrow Account Republic  
Executive Security Deposits

| CURRENCY                      | DOLLARS | CENTS |
|-------------------------------|---------|-------|
| COINS                         |         |       |
| PLEASE LIST CHECKS SEPARATELY |         |       |
| 1 <u>16.00</u>                | 16      | 00    |
| 2 <u>FARTINGTON</u>           | 250     | 00    |
| 3 <u>SPINKER</u>              | 75      | 00    |
| 4 <u>WEISNER</u>              | 50      | 00    |
| 5 <u>TUTTLE</u>               | 100     | 00    |
| 6 <u>ELMORE</u>               | 100     | 00    |
| 7 <u>CLARK</u>                | 50      | 00    |
| 8 <u>BROWN</u>                | 100     | 00    |
| 9 <u>TIPTON</u>               | 100     | 00    |
| 10 <u>CHAPBURN</u>            | 100     | 00    |
| 11                            |         |       |
| 12                            |         |       |
| 13                            |         |       |
| 14                            |         |       |
| 15                            |         |       |
| 16                            |         |       |
| 17                            |         |       |
| 18                            |         |       |
| 19                            |         |       |
| 20                            |         |       |
| 21                            |         |       |
| 22                            |         |       |
| 23                            |         |       |
| 24                            |         |       |
| TOTAL AMT.<br>FROM OTHER SIDE |         |       |
| TOTAL                         | 1,625   | 00    |

TOTAL 1,625.00

AMERICAN BANK STATIONERY CO. 6008

USE REVERSE SIDE FOR ADDITIONAL ITEMS.

Exhibit "D"  
I(14)



THE FIRST AMERICAN BANK  
OF PENSACOLA  
PENSACOLA, FLORIDA 32509

DATE Nov 1 1925

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE  
TERMS AND CONDITIONS OF THIS BANK'S COLLECTION AGREEMENT

DEPOSIT FOR CREDIT OF

| CURRENCY                         | DOLLARS | CENTS |
|----------------------------------|---------|-------|
| COINS                            |         |       |
| PLEASE LIST<br>CHECKS SEPARATELY |         |       |
| 1                                |         |       |
| 2 KILLER                         | 5       | 00    |
| 3 U.E.B.                         | 25      | 00    |
| 4 HARTMAN                        | 9       | 00    |
| 5 DULION                         | 5       | 00    |
| 6 SLATER                         | 10      | 00    |
| 7 RILEY                          | 15      | 00    |
| 8 VEAL                           | 25      | 00    |
| 9 STATE MTR                      | 25      | 00    |
| 10 DULION                        | 150     | 00    |
| 11 MORGAN                        | 10      | 00    |
| 12 WALLACE                       | 5       | 00    |
| 13 MOONEY                        | 5       | 00    |
| 14                               |         |       |
| 15                               |         |       |
| 16                               |         |       |
| 17                               |         |       |
| 18                               |         |       |
| 19                               |         |       |
| 20                               |         |       |
| 21                               |         |       |
| 22                               |         |       |
| 23                               |         |       |
| 24                               |         |       |
| TOTAL AMT.                       |         |       |
| FROM OTHER SIDE                  |         |       |
| TOTAL                            | 4       | 00    |

Community Bldg  
Pensacola  
Fla

TOTAL \$4.00

AMERICAN BANK STATIONERY CO. 6408

USE REVERSE SIDE FOR ADDITIONAL ITEMS.

Exhibit "E"

I(15)

87040634495



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Elise D. Biggs, Treasurer  
Republican Party of Florida--Federal  
Campaign Committee  
719 North Calhoun Street  
Tallahassee, Florida 32303

RE: MUR  
Republican Party of Florida--  
Federal Campaign Committee  
Elise D. Biggs, Treasurer

Dear Ms. Biggs:

On , 198 , the Federal Election Commission determined that there is reason to believe that the Republican Party of Florida--Federal Campaign Committee and you, as treasurer, violated 2 U.S.C. §§ 432(h) and 434(b), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 103. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

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

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as 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 complete its investigation of the matter. Further, requests for pre-probable cause conciliation will not be entertained after briefs on probable cause have been mailed to the respondent.

II(16)

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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 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 Shelley Garr, the staff member 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

87040634497

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO:

RESPONDENT: Republican Party of Florida -- Federal Campaign Committee, Elise Biggs, Treasurer

SUMMARY OF ALLEGATIONS

On April 25, 1986, the Commission received three identical complaints from Ronald E. Ginsbach alleging "improprieties of political contributions and improper accounting and reporting procedures of the Escambia County Victory '84 Fund ("Fund") and the Escambia County Republican Executive Committee Treasury ("Committee").<sup>1/</sup>

The complaints, sent simultaneously to the Commission and the Florida Department of State, Division of Elections, were originally referred to the Supervisor of Elections, Escambia County.

According to the complainant the Republican Party of the State of Florida instructed all County Committee Chairmen to set up separate segregated accounts for the Victory '84 Fund under the County Executive Committee.<sup>2/</sup>

<sup>1/</sup> While the complaint names the "Escambia County Republican Executive Committee Treasury," it appears that Mr. Ginsbach is referring to the "Escambia County Republican Executive Committee."

<sup>2/</sup> Victory '84 appears to be a project of the Republican Party of Florida -- Federal Campaign Committee ("Florida Committee"). On March 7, 1985, the treasurer for the Republican Party of Florida -- Federal Campaign Committee responded to an RFAI, which questioned reimbursements to the Committee's state account. Included with the response was a copy of a "Dear Fellow American" letter signed by Ronald Reagan. The self-addressed, stamped solicitation card and envelope included with the letter, was from "Victory '84 c/o Republican Party of Florida." Further, the letter states that "... the Republican Party in Florida has organized a Victory '84 Committee."

After checking FEC disclosure documents and RAD and Audit there appears to be no evidence to link the Victory '84 Committee as a project of the Reagan-Bush Committee or the RNC.



The complainant has cited six questionable contributions which, he claims, may have been improperly collected, deposited and reported:

1) Three contributions (Bechtol, \$100; Elmore, \$100; and Dulion, \$250) which were designated for the Fund but were, instead, diverted to the Committee account;

2) Two contributions (\$500 and \$642) from the Republican Victory Fund which were deposited in the Committee account; and

3) A cash contribution of \$240.

Complainant contends these contributions were incorrectly deposited into the Committee treasury, that no reports had been filed, and that the expenditure of these funds only required the approval of two co-chairmen of the Fund, Diana Rittenhouse and Vince Whibbs. Because "thousands of dollars in contributions and expenditures have not been properly accounted for, reported, or spent" between March 1984 through March 31, 1985, he has requested that the Commission examine this matter.

On May 20, and June 4, 1986, the Commission received responses from counsel for Vince Whibbs and Diana Rittenhouse, respectively. According to counsel, Diana Rittenhouse serves as chairman of the Committee but was in no way affiliated with the treasury of the Victory '84 Fund.<sup>3/</sup> Vince Whibbs, who served as

(2/ continued)

This Office has been unable to obtain any information regarding a Victory '84 Fund established under the Escambia County Republican Executive Committee.

chairman of the Victory '84 campaign was the only individual authorized to handle the treasury of the Victory '84 Fund.

Counsel further explained that at the end of October, 1984, immediately prior to the election, Mr. Whibbs continued to receive contributions, although no further monies were being expended by the Fund. Because they were excessive campaign funds and in excess of any amount necessary to defray the campaign, they were transferred to the local Escambia County Republican Executive Committee ("Committee") account. The money was apparently used to pay for radio advertising sponsored by the local Republican Party.<sup>4/</sup>

Counsel also provided copies of the Escambia County Republican Executive Committee's deposit slips to the First American Bank of Pensacola. These include:

- 1) Deposit ticket dated October 9, 1984, confirming "a contribution of excessive funds from 'Victory '84' to the local Republican Party on October 19, 1984" which totalled \$620;
- 2) Deposit ticket dated October 26, 1984, reflecting a contribution by check from Terrell Bechtol for \$100 which "was payable to the Escambia County Republican Executive Committee directly";

3/ Ms. Rittenhouse served as honorary co-chairman of the Reagan-Bush campaign in Escambia County.

4/ Counsel provided a copy of a handwritten notation from the Committee's records showing the amounts of money spent on advertising to seven radio stations. It is unclear, however, whether the money was spent for local election campaigns or federal campaigns.



- 3) Deposit ticket dated October 19, 1984, reflecting a \$100 contribution from B.F. Elmore which "was a payment to the local party to help defray the expenses of the radio advertising";
- 4) Deposit ticket dated November 1, 1984, "showing that Barbara M. Dunion also contributed \$250 to the party"; and
- 5) Deposit ticket dated January 2, 1985, "which reflects a final transfer of excess funds from 'Victory '84' to the local Escambia County Republican Executive Committee in the amount of \$642.00."5/

Counsel did not address the \$240 cash contribution.

LEGAL ANALYSIS

A. Republican Party of Florida -- Federal Campaign Committee

- 1) 2 U.S.C. § 432(h) and 11 C.F.R. § 103

Pursuant to 2 U.S.C. § 432(h) and 11 C.F.R. § 103, all political committees are required to deposit all receipts received by such committee into an account in a bank or other depository designated by such committee pursuant to 2 U.S.C. § 432(h)(1) and 11 CFR § 103.2. The treasurer of the committee shall make such deposits within 10 days of receipt. Finally, the committee shall make all disbursements by check or similar drafts drawn on an account at its designated campaign depository, except for expenditures of \$100 or less made from a petty cash fund maintained pursuant to 11 C.F.R. § 102.11 (See 11 C.F.R. § 103.3).

5/ In discussing these deposits, Counsel has referred to the "local Republican Party," the "Escambia County Republican Executive Committee," and the "local party." We presume these all to mean the Escambia County Republican Executive Committee.

The complainant alleges that 3 individual checks, each payable to Victory '84, two contributions from the Victory '84 Fund totalling \$500 and \$642, and a \$240 cash contribution were directly deposited in the Committee account.

If the funds were designated for the Victory '84 Fund, they were required to be deposited directly into the depository account maintained for the Victory '84 Fund by the Florida Committee before being transferred pursuant to 11 C.F.R. § 110.3(c) to the Committee account.<sup>6/</sup> It appears that the Florida Committee may have violated 2 U.S.C § 432(h) and 11 C.F.R. § 103.2 by failing to deposit 3 individual checks totalling \$450 and a cash contribution totalling \$240 into its Victory '84 Fund account before transferring the funds to the Committee account.

2) 2 U.S.C. § 434(b)

Pursuant to 2 U.S.C. § 434(b), all political committees are required to disclose for the reporting period and calendar year, the total amount of all receipts and the identification of each person who makes a contribution to the reporting committee during the reporting period, whose contribution or contributions aggregate in excess of \$200 within the calendar year. (See 2 U.S.C. § 434(b)(3)(A)). Additionally, 2 U.S.C. § 434(b)(5)(c) requires the reporting of each affiliated committee to which a transfer is made by the reporting committee during the reporting

<sup>6/</sup> Pursuant to 11 C.F.R. § 110.3(c), transfers between and among political committees which are national, State, district, or local committees and subordinate committees, thereof, of the same political party are unlimited.



period. The Florida Comittee's failure to report the transfer of funds from the Victory '84 Fund to the Committee and its failure to report the receipt of a \$250 contribution from Barbara Dunion appear to be in violation of 434(b).

87040634503



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Robert L. Crongeyer  
Beggs and Lane  
7th Floor, Blount Building  
Pensacola, Florida 32576-2950

RE: MUR

Dear Mr. Crongeyer:

The Federal Election Commission notified your clients on May 8, 1986, of two complaints alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). These have been merged as MUR. A copy of each complaint was forwarded to your clients at that time. We acknowledge receipt of your explanations of these matters which were dated May 13 and 28, 1986.

Upon further review of the allegations contained in the complaint and information supplied by you the Commission, on , 1986, determined to take no action at this time with respect to Diana Rittenhouse and Vince Whibbs, as individuals.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Charles N. Steele  
General Counsel

BY: Lawrence M. Noble  
Deputy General Counsel

II (24)

87040534504





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Vince Whibbs, Co-chairman  
Escambia County Republican Executive Committee  
3401 Navy Blvd.  
Pensacola, Florida 32506

RE: MUR  
Escambia County Republican  
Executive Committee

Dear Mr. Whibbs:

The Federal Election Commission notified the Escambia County Republican Executive Committee on , 1986, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to the Committee at that time.

Upon further review of the allegations contained in the complaint, the Commission, on , 1986, determined that there is reason to believe that the Escambia County Republican Executive Committee violated 2 U.S.C. §§ 433 and 434, provisions of the Act by failing to register and to report as a political committee.

As of this date, we have received no written response on behalf of the Committee in connection with this matter. Please submit answers to the enclosed questions within fifteen days of your receipt of this letter.

If the Committee is 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

II(25)

87040434505

Letter to Vince Whibbs  
Page 2

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

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless the Committee notifies the Commission in writing that it the matter to be made public.

If you have any questions, please contact Shelley Garz, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Joan Aikens  
Chairman

Enclosures  
Procedures

87040634506

II (26)



**QUESTIONS FOR THE ESCAMBIA COUNTY REPUBLICAN  
EXECUTIVE COMMITTEE**

1. Please describe the structure of the Escambia County Republican Executive Committee during the period January 1, 1984 -January 1, 1985. Who is the treasurer? Is the Escambia County Republican Executive Committee an affiliate committee of the Florida Republican Committee?
2. What is the connection between the Victory '84 Fund and the Escambia County Republican Executive Committee?
3. Please itemize and explain all contributions which were designated for the Victory '84 Fund but which were deposited into a bank account maintained by the Escambia County Republican Executive Committee. Please describe how these funds were used.
4. Please describe the type of advertising undertaken by the Escambia County Republican Executive Committee with respect to the 1984 election.
5. Please discuss whether the advertising was done on behalf of local election campaigns and/or Federal campaigns.
6. Please discuss disposition of the following contributions: (If by check, please indicate the name of the payee): Terrell Bechtol (\$100); B.F. Elmore (\$100); Barbara Dulton (\$250); excess cash contributions from the "Victory '84" Committee.

87040534507

RECEIVED AT THE FEC  
CCC#628

86 JUN 2 11:46

**BEGGS & LANE**

ATTORNEYS AND COUNSELLORS AT LAW  
SEVENTH FLOOR BLOUNT BUILDING  
PENSACOLA, FLORIDA

ROBERT P. GAINES  
WILLIAM GUY DAVIS, JR.  
W. SPENCER MITCHEM  
JAMES M. WEBER  
ROBERT L. CRONGEYER  
JOHN F. WINDHAM  
J. NIXON DANIEL, III  
G. EDISON HOLLAND, JR.  
RALPH A. PETERSON  
RONALD L. NELSON  
GARY B. LEUCHTMAN  
THOMAS R. JENKINS  
JEFFREY A. STONE  
BARBARA W. PALMER

POST OFFICE BOX 12950  
PENSACOLA, FLORIDA 32576-2950  
TELEPHONE (904) 432-2451

E. DIXIE BEGGS  
of Counsel

BERT H. LANE  
1917-1981

May 28, 1986

Ms. Shelley Garr  
Staff Counsel  
Federal Election Commission  
Washington, D.C. 20463

Re: MUR 2168, MUR 2170

Dear Ms. Garr:

Attached please find the original statements of designation of counsel in MUR 2168 and MUR 2170, which have been signed by the respondent Vince Whibbs, Sr.

In reply to the allegations against Mr. Whibbs brought by Ronald E. Ginsbach of Pensacola, as I indicated to you in my letter replying to the complaints Mr. Ginsbach brought against another respondent, Mrs. Diana Rittenhouse, Chairman of the Escambia County Republican Executive Committee, I believe that Mr. Ginsbach's letters are politically motivated. Indeed, Mr. Ginsbach has openly told Mr. Whibbs, who is the Mayor of Pensacola, that unless Mr. Whibbs saw to it that Mrs. Rittenhouse was removed as local Escambia County Chairman, Mr. Ginsbach would cause "trouble."

As I indicated in my letter of May 13, 1986, with respect to the Rittenhouse situation, we have requested the Florida Department of State, Division of Elections, to refer the prior matter to the Office of the State Attorney for this Circuit so that Mr. Ginsbach can be prosecuted under Florida Statute 106.25(6) which makes it a misdemeanor of the first degree in the State of Florida to file a complaint with the Division of Elections, knowing the allegations of the complaint to be false or without merit. Nonetheless we will try to respond to these additional charges against Mr. Whibbs.

Vince Whibbs was Chairman of the "Victory '84" campaign here in Escambia County and received contributions toward the "Victory '84" campaign. At the end of October, 1984, immediately prior to the election, the checks continued to come in to Mr. Whibbs, although no further monies were being expended by "Victory '84"

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May 28, 1986

on the campaign. Because these were "excess campaign funds" which Mr. Whibbs determined to be in excess of any amount necessary to defray the campaign, they were transferred to the local Escambia County Republican Executive Committee. Ultimately the money was spent to pay for radio advertising on area radio stations ads sponsored by the local Republican Party. Attached as Exhibit "A" is a handwritten notation from the committee's records showing amounts of money spent on advertising with these radio stations by the Escambia County Republican Executive Committee.

Exhibit "B" is a copy of a deposit slip to the First American Bank of Pensacola, dated October 9, 1984, confirming that there was a contribution of excess funds from "Victory '84" to the local Republican Party on October 19, 1984.

Exhibit "C" is a copy of a deposit slip, dated October 26, 1984, showing that there was contribution by check from Mr. Terrell Bechtol in the amount of \$100.00 which contribution was payable to the Escambia County Republican Executive Committee directly and also used to help pay for these radio ads.

Exhibit "D" is a copy of a deposit slip dated October 19, 1984, showing a contribution from Mr. B.F. Elmore in the amount of \$100.00, which again was a payment to the local party to help defray the expenses of the radio advertising.

Exhibit "E" is a copy of another deposit slip, dated November 1, 1984, showing that Mrs. Barbara M. Dulton also contributed \$250.00 to the party, also to help defray the costs of the radio advertising.

The final item Exhibit "F", is a copy of a deposit slip dated January 2, 1985, which reflects a final transfer of excess funds from "Victory '84" to the local Escambia County Republican Executive Committee in the amount of \$642.00.

Vince Whibbs is a dedicated and energetic citizen who volunteered to serve in the capacity of "Victory '84" Chairman. He did not receive any compensation whatsoever for his efforts. My own research into this matter leads me to conclude that a situation such as this is covered by the Provisions of Title 2, United States Code, Section 439a, and by 11 CFR 113.2(c). The Code of Federal Regulations, Section 113.2, provides in pertinent part as follows:

9704034509

Ms. Shelley Garr

-3-

May 28, 1986

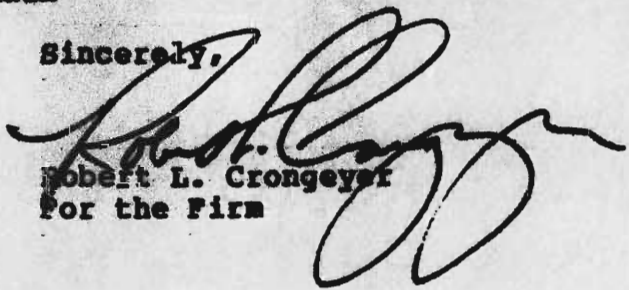
"Excess campaign funds donated:

...  
(c) may be transferred without limitation to any National state or local committee, or any political party;"

We respectfully and sincerely submit that Mr. Whibbs has done absolutely nothing wrong and to the contrary, he has attempted to comply with the letter of the law in every respect. I sincerely appreciate your courtesy and cooperation when I spoke with you last week on the phone and if there is anything further we could do, or need to do, please let us know. I hope you will concur with our assessment that these allegations of Mr. Ginsbach's are totally devoid of merit.

With best wishes, I remain

Sincerely,

  
Robert L. Crongeyer  
For the Firm

cc: Vince Whibbs

Enclosures

Exhibits A-F

Affidavit

87040634510



**STATEMENT OF DESIGNATION OF COUNSEL**

**MUR** 2170 / 2168

**NAME OF COUNSEL:** Robert L. Cronqever, Esq.

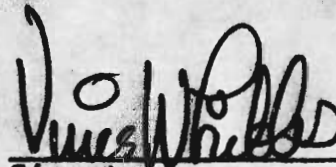
**ADDRESS:** P.O. Box 12950

Pensacola, Fla. 32576

**TELEPHONE:** 904-432-2451

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.

5-19-86  
Date

  
Signature

**RESPONDENT'S NAME:** Vince Whibbs

**ADDRESS:** 3201 Navy Blvd.

Pensacola, Fla. 32505

**HOME PHONE:** 904-432-9724

**BUSINESS PHONE:** 904-434-3044

8704034511

10-30-61

che Sultan - 478-7283

Ed

✓WXB M. Radio 148.50

✓WBSR 104.00

✓WJLQ 302.00

✓WMEZ 231.20

✓WHYM 90.00

✓WCOA 304.00

WOWW

1,186.70

25.51

Money

For

Advertising

Mrs. F. W. ~~Riley~~ Riley

Vice Mayor

87040534512

Exhibit "A"



THE FIRST AMERICAN BANK  
OF PENSACOLA  
PENSACOLA, FLORIDA 32503

DATE 7-19-64  
CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE  
TERMS AND CONDITIONS OF THIS BANK'S COLLECTION AGREEMENT

| CURRENCY                         | DOLLARS   | CENTS     |
|----------------------------------|-----------|-----------|
| COINS                            |           |           |
| PLEASE LIST<br>CHECKS SEPARATELY |           |           |
| 1. <u>1.00</u>                   | <u>1</u>  | <u>00</u> |
| 2. <u>WE28</u>                   | <u>25</u> | <u>00</u> |
| 3. <u>CAMP</u>                   | <u>50</u> | <u>00</u> |
| 4. <u>BURNS</u>                  | <u>20</u> | <u>00</u> |
| 5. <u>VICTORY 84</u>             | <u>50</u> | <u>00</u> |
| 6.                               |           |           |
| 7.                               |           |           |
| 8. <i>"Sumpter"</i>              |           |           |
| 9. <i>"as per list"</i>          |           |           |
| 10. <i>"620"</i>                 |           |           |
| 11.                              |           |           |
| 12.                              |           |           |
| 13.                              |           |           |
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| 24.                              |           |           |
| TOTAL AMT.<br>FROM OTHER SIDE    |           |           |
| TOTAL                            | <u>6</u>  | <u>00</u> |

DEPOSIT FOR CREDIT OF Escambia County Legislative  
Executive Committee

TOTAL 6.00

AMERICAN BANK STATIONERY CO. 6408

USE REVERSE SIDE FOR ADDITIONAL ITEMS.

Exhibit "B"

I(12)

87040534513

**THE FIRST AMERICAN BANK  
OF PENSACOLA  
PENSACOLA, FLORIDA 32505**

DATE May 26 1981  
CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE  
TERMS AND CONDITIONS OF THE BANK'S COLLECTION AGREEMENT

DEPOSIT FOR CREDIT OF Escambia County Republican Executive Committee

| CURRENCY                      | DOLLARS    | CENTS     |
|-------------------------------|------------|-----------|
| COINS                         |            |           |
| PLEASE LIST CHECKS SEPARATELY |            |           |
| 1. <u>L...</u>                | <u>11</u>  | <u>00</u> |
| 2. <u>PICKRON</u>             | <u>10</u>  | <u>00</u> |
| 3. <u>VEAL</u>                | <u>25</u>  | <u>00</u> |
| 4. <u>DUNN</u>                | <u>100</u> | <u>00</u> |
| 5. <u>HATTAWAY</u>            | <u>50</u>  | <u>00</u> |
| 6                             |            |           |
| 7                             |            |           |
| 8                             |            |           |
| 9                             |            |           |
| 10                            |            |           |
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| 12                            |            |           |
| 13                            |            |           |
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| 18                            |            |           |
| 19                            |            |           |
| 20                            |            |           |
| 21                            |            |           |
| 22                            |            |           |
| 23                            |            |           |
| 24                            |            |           |
| TOTAL AMT.<br>FROM OTHER SIDE |            |           |
| TOTAL                         | <u>325</u> | <u>00</u> |

TOTAL

325.00

AMERICAN BANK STATIONERY CO. 6405

USE REVERSE SIDE FOR ADDITIONAL ITEMS.

Exhibit "C" I(13)



THE FIRST AMERICAN BANK  
OF PENSACOLA  
PENSACOLA, FLORIDA 32505

DATE Oct 27 1967  
CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE  
TERMS AND CONDITIONS OF THIS BANK'S COLLECTION AGREEMENT

| CURRENCY                      | DOLLARS    |              | CENTS     |
|-------------------------------|------------|--------------|-----------|
|                               |            |              |           |
| COINS                         |            |              |           |
| PLEASE LIST CHECKS SEPARATELY |            |              |           |
| 1 <u>LIBERTY BELL</u>         | <u>10</u>  | <u>00</u>    |           |
| 2 <u>FANTHINGTON</u>          | <u>250</u> | <u>00</u>    |           |
| 3 <u>SPINKER</u>              | <u>75</u>  | <u>00</u>    |           |
| 4 <u>WEISNER</u>              | <u>50</u>  | <u>00</u>    |           |
| 5 <u>TUTTLE</u>               | <u>10</u>  | <u>00</u>    |           |
| 6 <u>ELMORE</u>               | <u>10</u>  | <u>00</u>    |           |
| 7 <u>CLARK</u>                | <u>50</u>  | <u>00</u>    |           |
| 8 <u>BROWN</u>                | <u>10</u>  | <u>00</u>    |           |
| 9 <u>TIPTON</u>               | <u>10</u>  | <u>00</u>    |           |
| 10 <u>CHADBOURNE</u>          | <u>100</u> | <u>00</u>    |           |
| 11                            |            |              |           |
| 12                            |            |              |           |
| 13                            |            |              |           |
| 14                            |            |              |           |
| 15                            |            |              |           |
| 16                            |            |              |           |
| 17                            |            |              |           |
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| 19                            |            |              |           |
| 20                            |            |              |           |
| 21                            |            |              |           |
| 22                            |            |              |           |
| 23                            |            |              |           |
| 24                            |            |              |           |
| TOTAL AMT.<br>FROM OTHER SIDE |            |              |           |
| TOTAL                         |            | <u>1,025</u> | <u>00</u> |

DEPOSIT FOR CREDIT OF Escambia County Jail

TOTAL 1,025.00

AMERICAN BANK STATIONERY CO. 6400

USE REVERSE SIDE FOR ADDITIONAL ITEMS.

Exhibit "D"  
I(14)

THE FIRST AMERICAN BANK  
OF PENSACOLA  
PENSACOLA, FLORIDA 32505

DATE 11.1.1985  
CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE  
TERMS AND CONDITIONS OF THE BANK'S COLLECTION AGREEMENT

| CURRENCY                         | DOLLARS | CENTS |
|----------------------------------|---------|-------|
| COINS                            |         |       |
| PLEASE LIST<br>CHECKS SEPARATELY |         |       |
| 1                                |         |       |
| 2 KILLER                         | 5       | 00    |
| 3 U.E.P.B.                       | 25      | 00    |
| 4 HARTMAN                        | 9       | 00    |
| 5 DULION                         | 5       | 00    |
| 6 SLATER                         | 10      | 00    |
| 7 RILEY                          | 75      | 00    |
| 8 VEAL                           | 25      | 00    |
| 9 STATE MTR                      | 25      | 00    |
| 10 DULION                        | 150     | 00    |
| 11 MORGAN                        | 10      | 00    |
| 12 WALLACE                       | 5       | 00    |
| 13 MOONEY                        | 5       | 00    |
| 14                               |         |       |
| 15                               |         |       |
| 16                               |         |       |
| 17                               |         |       |
| 18                               |         |       |
| 19                               |         |       |
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| 21                               |         |       |
| 22                               |         |       |
| 23                               |         |       |
| 24                               |         |       |
| TOTAL AMT.<br>FROM OTHER SIDE    |         |       |
| TOTAL                            | 4       | 00    |

DEPOSIT FOR CREDIT OF

Exhibit "E" Security Deposit

TOTAL

425.00

AMERICAN BANK STATIONERY CO. 6400

USE REVERSE SIDE FOR ADDITIONAL ITEMS

Exhibit "E"

I(15)

87040534516



**BEGGS & LANE**  
ATTORNEYS AND COUNSELLORS AT LAW  
SEVENTH FLOOR BLOUNT BUILDING  
PENSACOLA, FLORIDA

ROBERT P. GAINES  
WILLIAM GUY DAVIS, JR.  
W. SPENCER MITCHEM  
JAMES M. WEBER  
ROBERT L. CRONGEYER  
JOHN F. WINDHAM  
J. NIXON DANIEL, III  
G. EDISON HOLLAND, JR.  
RALPH A. PETERSON  
RONALD L. NELSON  
GARY B. LEUCHTMAN  
THOMAS R. JENKINS  
JEFFREY A. STONE  
BARBARA W. PALMER

RECEIVED AT THE FEC  
CCC# 526

86 MAY 20 49:29

POST OFFICE BOX 12950  
PENSACOLA, FLORIDA 32576-2950  
TELEPHONE (904) 432-2481

E. DIXIE BEGGS  
of Counsel

BERT H. LANE  
1917-1981

May 13, 1986

Ms. Shelley Garr  
Staff Counsel  
Federal Election Commission  
1325 K Street, NW  
Washington, D.C. 20463

Re: Complaint Numbers 2168/2169

Dear Ms. Garr:

Thank you for your courtesy and cooperation in speaking with me on the phone yesterday. Please find attached a signed statement of designation of counsel executed by Diana A. Rittenhouse, who is now, and has been for a considerable period of time, chairman of the Escambia County Republican Executive Committee. I am appearing at this point specifically on behalf of Mrs. Rittenhouse to respond to these charges brought by Ronald E. Ginsbach a Republican Precinct Committeeman here in Escambia County.

At the outset, however, you should note that we already at this juncture have responded to an inquiry from the Florida Department of State, Division of Elections, with respect to earlier spurious claims brought by Mr. Ginsbach. I am attaching a copy of my letter of April 24, 1986, addressing the allegations presented by Mr. Ginsbach to the State of Florida which are entirely devoid of merit. I have recommended to the State of Florida that Mr. Ginsbach be reported to the office of the State Attorney for this Circuit for prosecution under Florida Statute 106.25(6) which makes it a misdemeanor in the first degree in the State of Florida to file a complaint with the Division of Elections knowing the allegations of the complaint to be false or without merit. I assume that the Division of Elections is presently giving consideration to referral to that matter to the office of the State Attorney for the First Judicial Circuit for prosecution of Mr. Ginsbach. Furthermore, at the outset I should mention on the issue of motivation, Mr. Ginsbach is a disappointed local political activist, who has verbally openly threatened to cause trouble for Mrs. Rittenhouse if she did not voluntarily agree to step down as Escambia County Republican Executive Committee

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RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

87040534517

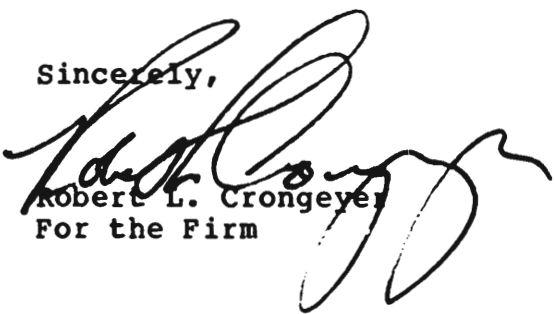
May 13, 1986

Chairman of Escambia County.

With that background, I wish to turn to addressing the questions raised in Mr. Ginsbach's letter concerning contributions to the Republican Executive Committee Treasury. In the first place, Mr. Ginsbach is completely erroneous when he alleges that Mrs. Rittenhouse was "Victory '84 Co-Chairman." Mrs. Rittenhouse was never, at any time, co-chairman of "Victory '84." Neither has Mrs. Rittenhouse ever served as Treasurer of the Escambia County Republican Executive Committee. Evidently, as the presidential election approached in October, 1984, a number of contributions to "Victory '84" continued to be made to that fund by persons wishing to support the Republican Reagan-Bush ticket. It is my understanding that monies which were not expended on the campaign by "Victory '84" could be donated to any cause, and I would surmise the most suitable cause was found to be the local Republican Party. I do not know whether there are any restrictions on the local Republican Party being able to accept contributions, anonymous or not, from any source. But I gather that the local Republican Committee should be free to spend its treasury as it sees fit.

I can assure you, as counsel for Mrs. Rittenhouse, Chairman of the Escambia County Republican Executive Committee, that no impropriety was ever intended, and we certainly hope none has occurred. Mrs. Rittenhouse, of course, receives no compensation whatsoever for her many hours of volunteer effort and she certainly would not attempt to violate the law in any manner. If there are any further questions or wish to discuss this matter further, please contact me here in Pensacola at the letterhead telephone number. Again, I certainly appreciate the courtesy and your cooperation you extended me when I spoke to you on the phone earlier this morning.

Sincerely,

  
Robert L. Crongeyer  
For the Firm

RLC/pla

Enclosure

Copy of Robert L. Crongeyer letter/4-24-86  
Signed Statement of Designation of Counsel

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April 24, 1986

Mr. Garrett E. Spitzer, Investigator  
Florida Department of State  
Division of Elections  
Room 1801, the Capitol  
Tallahassee, Florida 32301

Re: Dianna Rittenhouse; complaint alleging  
violations of Chapter 106.07(4)(a)

Dear Garrett:

Thank you for speaking with me Tuesday about the above matter. After talking with you, I phoned Mrs. Rittenhouse, who of course, was very upset and distraught about Mr. Ginsbach's allegations. After I talked with her, however, she was able to contact the Escambia County Republican Committee Secretary, who, in turn, was able to retrieve from the local party files the original ticket stubs filled out by those persons who paid cash to attend the dinner for Senator Paula Hawkins here in Pensacola last year.

The first attachment to our response is a copy of a letter dated April 13, 1985, addressed to Joe Oldmixon, supervisor of elections here in Escambia County, which lists the names of those in question. I have also attached a xerox copy of the ticket stubs filled out personally by these individuals who attended the dinner. I stress that the ticket stubs were filled out by these ticket purchasers in their own handwriting.

Also, the local party has maintained a record of the names of the persons who had been provided tickets to sell and the serial numbers of the tickets each of the sellers had in his or her respective possession. Accordingly, from review of the records we have ascertained the following:

Ticket #38 was sold by Mary MacNeil to R.T. Russell;  
Ticket #52 was sold at the door by Jewel Bradfield to Ruby  
Butler;

Garrett E. Spitzer

-2-

April 24, 1986

Tickets #60 and #61 were sold by Jackie Thornhill to Harold J. Burkhart and his wife, Charlotte;  
Tickets #102 and #103 were sold by Dub Hampton to himself and his wife;  
Ticket #117 was sold at the door by Jewel Bradfield to Ms. Schifferbauer, and  
Ticket #338 was sold by Vince Whibbs to Richard Gibbs.

Again, each of the purchasers of these tickets to the dinner for Senator Hawkins wrote out their own ticket stubs. We have the originals of each of these stubs if you would like to examine them more closely. I am certain, however, that each of these people will verify that they did, in fact, buy tickets to the dinner for Senator Hawkins, paying the amounts reflected, which does account for all the monies received. Frankly, I do not understand how Mr. Ginsbach in good faith could make any kind of allegations that these reports were "fictitious" or "falsified" in some manner to cover illicit cash contributions of some kind. I note that F.S. 106.25(6) makes it a misdemeanor of the first degree, punishable by imprisonment up to one year and a fine of up to one thousand dollars (\$1,000.00), for filing a complaint knowing the allegations contained in it to be false or without merit. I sincerely suggest that some follow-up with the office of the State Attorney here may be merited in light of the patently malicious and purely frivolous and harrassing nature of these allegations.

Also, as I indicated on the phone, while Mrs. Rittenhouse was honorary co-chairman of the Reagan-Bush campaign in Escambia County, she was in no way affiliated with the treasury of the "Victory '84" fund which was a federally registered PAC set up on a nationwide basis. The Honorable Vince Whibbs, Mayor of Pensacola, certainly scrupulous and highly ethical individual, was the sole individual authorized to handle the treasury of "Victory '84" funds.

I hope that you will agree that we have responded fully and fairly to your inquiry with respect to the alleged section 106.07

87040534520



Garrett E. Spitzer

-3-

April 24, 1986

violation on the part of Mrs. Rittenhouse and I am confident that you will agree that this complaint is utterly baseless and frivolous. As I mentioned, Mrs. Rittenhouse has been most concerned and anxious about these allegations, as I am sure you can appreciate, and we would be grateful if you could let us know as soon as is reasonably possible if you concur with our suggestion that the violation claim is without merit.

Again, I certainly appreciate your courtesy and cooperation in discussing this matter with me over the phone yesterday and again, I trust we have fairly answered the questions which were raised.

With personal best regards, I remain

Sincerely,

Robert L. Crongeyer  
For the Firm

RLC/pla

cc: Dianna Rittenhouse

Enclosure

87040534521



**STATEMENT OF DESIGNATION OF COUNSEL**

**NO.** 2168/2170

**NAME OF COUNSEL:** Robert L. Crongeyer, Beggs & Lane

**ADDRESS:** 700 Blount Building

P.O. Box 12950

Pensacola, Florida 32576

**TELEPHONE:** (904) 432-2451

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.

5/13/86

**Date**

*Diana Rittenhouse*  
**Signature**

**RESPONDENT'S NAME:**

Diana Rittenhouse

**ADDRESS:**

6234 Appomattox Drive

Pensacola, Florida 32503

**HOME PHONE:**

476-3879

**BUSINESS PHONE:**

474-0255

87040634522



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 8, 1986

Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

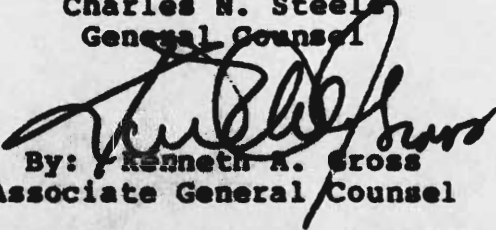
Dear Mr. Ginsbach:

This letter will acknowledge receipt of a complaint filed by you which we received on April 25, 1986, which alleges possible violations of the Federal Election Campaign Act of 1971, as amended, (the "Act"), by Victory '84 Fund Co-Chairman and the Escambia County Republican Executive Committee. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints. We have numbered this matter under review MUR 2168. Please refer to this number in all future correspondence. If you have any questions, please contact Lorraine F. Ramos at (202) 376-3110.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosure

P.S. This will acknowledge receipt of your letter dated April 16, 1986. MUR 2168 incorporates the complaint outlined in your earlier correspondence.

87040534523



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

May 8, 1986

Victory '84 Fund Co-Chairmen  
3401 Navy Blvd.  
Pensacola, Fl. 32505

Re: MUR 2168

Dear Sir:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Victory '84 Committee and you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2168. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and your committee in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

8704034524

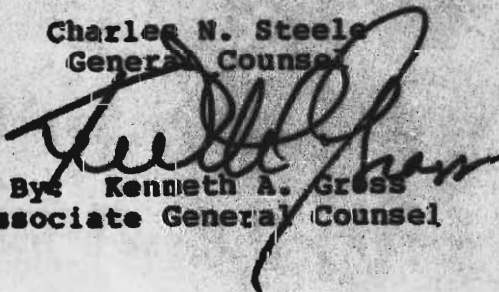


-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel

87040634525



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

May 8, 1986

Escambia County Republican Executive Committee  
6234 Appomattox Dr.  
Pensacola, Florida 32503

Re: MUR 2168

Dear Sir/Madam:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Escambia County Republican Executive Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2168. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

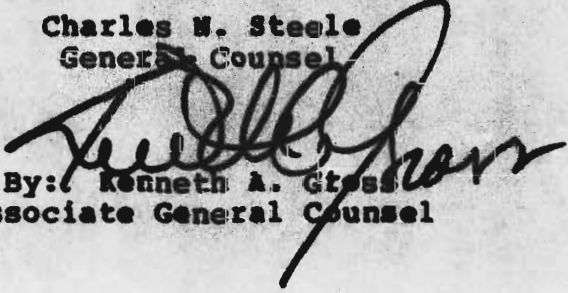
87040334526

-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8288. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel

8704034527





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Mr. Ginsbach:

This letter will acknowledge receipt of a complaint filed by you which we received on April 25, 1986, which alleges possible violations of the Federal Election Campaign Act of 1971, as amended, (the "Act"), by Victory '84 Fund Co-Chairman and the Escambia County Republican Executive Committee. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints. We have numbered this matter under review MUR 2168. Please refer to this number in all future correspondence. If you have any questions, please contact Lorraine F. Ramos at (202) 376-3110.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure

P.S. This will acknowledge receipt of your letter dated April 16, 1986. MUR 2168 incorporates the complaint outlined in your earlier correspondence.

per 5/6/86

87040534528



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

**Escambia County Republican Executive Committee  
6234 Appomattox Dr.  
Pensacola, Florida 32503**

**Re: MUR 2168**

**Dear Sir/Madam:**

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Escambia County Republican Executive Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2168. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

*Recy 5/6/86*

87040634529

-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel

87040634530





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

Victory '84 Fund Co-Chairmen  
3401 Navy Blvd.  
Pensacola, Fl. 32505

Re: MUR 2168

Dear Sir:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Victory '84 Committee and you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2168. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and your committee in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

py 5/6/82

8704034531

-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles M. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel

87040634532

CONFIDENTIAL  
DEPARTMENT OF STATE DIVISION OF ELECTIONS  
Plus Office Box 6500  
Tallahassee, Florida 32304  
COMPLAINT

RECEIVED  
MAR 21 PM 3:42  
Jedrus

COMPLAINANT (person bringing complaint):

Name: Ronald E. Ginsbach Telephone Number: 904-456-8820  
Address: 6801-A Esther Street  
Pensacola, Florida Zip Code: 32505  
City:

RESPONDENT (person or committee complained against, limit one person or committee per complaint form):

Name: Victory-84 Fund Co-Chairmen Telephone Number: \_\_\_\_\_  
Address: 3401 Navy Blvd.  
Pensacola, Florida Zip Code: 32505  
City:

ALLEGED VIOLATIONS:

1. Failure to report receipt or disbursement of funds, in any way.
  2. Receiving funds under one name and causing them to be deposited under another name.
  3. Receiving cash contributions with no names or addresses.
  4. Total and purposeful disregard for established procedures for receiving, reporting and disbursement of political contributions.
- See attached pages 1 thru 5.

STATE OF FLORIDA  
COUNTY OF Escambia

OATH

I, Ronald E. Ginsbach, the person bringing this complaint, being first duly sworn, do depose on oath and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge.

Ronald E. Ginsbach  
Signature of Complainant

Sworn to and subscribed before me:

this 17<sup>th</sup> day of April, 1986

Otto Hays  
Notary Public

NOTE: The Division of Elections investigative authority is limited to violations of Chapter 105, Florida Statutes. Pursuant to Section 100.20, Florida Statutes, this complaint must remain confidential until a final disposition is made by the Florida Election Commission.

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
OTTO HAYS, Notary Public  
EXPIRES MAR. 15, 1988  
SIGNED: TALLAHASSEE-BALTIMORE-ANNAPOLIS, INC.

87040634533  
APR 23 PM 2:21  
APR 23 PM 2:42



Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Florida Division of Elections, Room 1801  
The Capitol  
Tallahassee, Florida 32301

h 11, 1986

RECEIVED

NOV 12 1986

OVERALL ELECTIONS  
TALLAHASSEE, FLA.

Dear Mrs. Glisson:

Several apparent improprieties of political contributions and improper accounting and reporting procedures of Escambia County Victory 84' and Escambia County Republican Executive Committee Treasury practices have been brought to my attention. For example several items of questionable nature in an Escambia County Republican Executive Committee Report dated 11-2-84 require clarification.

The first entry is a contribution from "Republican Victory Fund" dated 10-11-84 for \$500.00. Who authorized contributions that were supposedly intended to Reagan-Bush re-election to be deposited in the Escambia County Republican Executive Committee Treasury? On what authority was this decision based? Who were the original contributors of \$500.00? Is it a general practice that contributions raised for one political cause to be diverted to another political cause without the approval of the original donors?

Next is a contribution from J. Terryl Bechtol in the amount of \$100.00 on 10-16-84. This check was payable to Victory 84', but was deposited in the Escambia County Republican Executive Committee Treasury. Who authorized this change in intended repositories without the knowledge and/or consent of the contributor? On what written authority was this decision based?

Another item brought to my attention is a contribution from Benjamin F. Elmore for \$100.00. This check was payable to Victory 84' but was deposited in the Escambia County Republican Executive Committee Treasury. The check (copy enclosed) was dated 10-10-84 and deposited 10-30-84. Mr. Elmore has stated that he emphatically told the co-chairman of Victory 84' that this money was strictly for Reagan-Bush and was definitely not to go to the Escambia County Republican Executive Committee. Who authorized this deposit in direct contradiction to the contributors expressed wishes? On what written authority was this decision based and by whom?

The next item of concern is a contribution by Barbara N. Dulton of \$250.00 dated 11-1-84. Mrs. Dulton is a registered Democrat. This check was payable to Victory 84' but was deposited in the Escambia County Republican Executive Committee Treasury. Who authorized the change of intended repositories in obvious contradiction to the contributors wishes? On what written authority was this accomplished? Where a lot of Democrats have and will continue to contribute to Republican causes, this may not continue if the funds are not placed where intended. Has Mrs. Dulton been informed of where her \$250.00 was deposited? If so, by whom? If not, why hasn't she been so informed?

Of additional serious concern is a contribution of \$642.00 from Victory 84' on 1-2-85. Where did this money come from? Who were the original contributors? In what amounts were the contributions? Why were these these deposits made 2 (two) months after the Victory 84' campaign terminated? Why were these contributions not returned to the original contributors, thanking them for contributing and for their support? Is this accepted practice? If so, what written publication authorizes these practices?

The next item of concern is the cash contribution of \$240.00 on 2-15-85, with no names or addresses. Where did this money come from?

10:07  
(2/11/86)

1

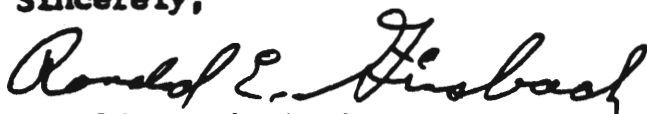
3 7 0 4 0 3 3 4 5 3 5  
The office of the Chairman of the Republican Party of the State of Florida instructed all County Committee Chairman to set up a separate account for the Victory 84' Fund under the County Executive Committee. The co-chairman of Victory 84' in Escambia County informed me that no donation expenditure reports were required to be filed. Is this statement true? No reports were filed anywhere to the best of my knowledge. I enclose a copy of the reply to my letter from the Secretary of State, Division of Elections, State of Florida.

The Escambia County Republican Executive Committee Chairman has stated that the expenditure of Victory 84' funds deposited in the Escambia County Republican Executive Committee Treasury did not require full Executive Committee approval but only the approval of the two co-chairmen for Victory 84'. Can any funds deposited in a County Executive Committee Treasury be expended without that committee's authorization? If so, please cite the authority allowing this.

It appears that several thousands of dollars in contributions and expenditures have not been properly accounted for, reported, or spent and may include large cash contributions, between March 1984 thru March 31, 1985

Your assistance in resolving the answers to these questions is requested. My fears are that these funds were not properly collected, deposited, and reported as requested and intended. Specific answers to specific questions stated above are requested. Additionally, please advise which if any election law violations have occurred and what if any corrective actions should be taken and if so, by whom? Please provide a reply to this letter within thirty (30) days from the date of this letter. Your help in clarifying all of this will be greatly appreciated by all Republicans in Escambia County.

Sincerely,



Ronald E. Ginsbach  
Republican Precinct Committeeman, Precinct #99  
6901-A Esther St.  
Pensacola, Fl 32506  
Telephone 456-8820

2 enclosures

REG/jpn

87040534536

*For deposit only  
to bank*

PERMANENT REC.

ATLANTA, GA

62-101-32301

ATLANTA, GA

**PAID**

DAMARIS M. ELMORE, 577-82-8857 11/81  
15 E. BARK ROAD, SUITE 404-4042  
PENSACOLA, FL 32503

100-0-9 000000

*On* **100-** *Delmar*

**THE WEST FLORIDA BANK**  
PENSACOLA, FLORIDA

*Ben Elmore*

000000 000000





# Supervisor of Elections Escambia County

**JOE OLDMIXON**  
SUPERVISOR OF ELECTIONS

March 20, 1986

Room 400, County Courthouse  
Post Office Box 12001  
Pensacola, Florida 32574-2001  
(904) 436-5796  
(SUNCOM) 237-5799

Mr. Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Ron:

In reply to your letter of March 11, 1986, the only portion of it that I can reply directly to is the portion concerning "the cash contribution of \$240.00 on 2-15-85, with no names or addresses". After calling Mr. Moore, the treasurer of the Republican Executive Committee at that time, he supplied me with the names and addresses of these contributors; copy enclosed.

The election laws of Florida do not give me direct control over the contributions and expenditures of the Democratic and Republican Executive Committees. Therefore, I cannot give you any answers to any other questions in your letter. I would suggest that if you want further information you contact the Federal Election Commission or the Secretary of State's Office:

Federal Election Commission  
1325 "K" Street NW  
Washington, D. C. 20463  
Phone: 202-523-4181  
or 1-800-424-9530

Mrs. Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Division of Elections  
Post Office Box 6508  
Tallahassee, Florida 32301  
Phone: 904-488-7690

Sorry I cannot be of more help to you.

Sincerely,

  
Joe Oldmixon  
Supervisor of Elections

JO/jk  
Enclosure

8704034537

4



FLORIDA DEPARTMENT OF STATE  
George Firestone  
Secretary of State

Dorothy W. Glisson  
Deputy Secretary For Elections

March 26, 1986

Mr. Ronald E. Ginsbach  
Republican Precinct Committeeman  
Precinct 99  
6901 - A Ester Street  
Pensacola, Florida 32506

Dear Mr. Ginsbach:

Your letter of March 11, has been received. Enclosed is a sworn complaint form which you may use to file a complaint with this office. We will then have an investigation made and present our findings to the Florida Election Commission.

The information which you submitted is returned, so it can be attached to the complaint.

Please let us know if we may be of assistance to you at any time.

Sincerely,

*Dorothy W. Glisson*  
Dorothy W. Glisson  
Deputy Secretary for Elections

DWG:nd

Enclosures

87040434538

CONFIDENTIAL  
DEPARTMENT OF STATE/DIVISION OF ELECTIONS  
Post Office Box 9900  
Tallahassee, Florida 32304  
COMPLAINT

*Federal*

36 APR 21 1986

RECEIVED

COMPLAINANT (person bringing complaint):

Name: Ronald E. Ginsbach Telephone Number: 904-436-8820  
Address: 6901-A Esther Street  
City: Panama City, Florida Zip Code: 32304

RESPONDENT (person or committee complained against. List one person or committee per complaint form):

Name: Dianna Rittenhouse - Victory-84 Co-Chairman Telephone Number: 904-476-3879  
Address: 6234 Appomattox Drive  
City: Panama City, Florida Zip Code: 32303

*Alleged* ALLEGED VIOLATIONS:

1. Failure to report the receipt or disbursement of funds with full knowledge of the requirements to do so for all political contributions.
  2. Receiving funds under one fund name and causing them to be deposited under a totally different name and intent.
  3. Possibly causing funds to be collected under one candidate for federal office fund to be used for furthering another candidate for federal office's campaign.
  4. Total, purposeful and blanton disregard for established procedures for receiving, reporting and disbursing political contributions.
  5. Receiving cash contributions with no names and addresses, and then later furnishing what might be fictitious names.
- See attached pages 1 thru 5.

STATE OF FLORIDA  
COUNTY OF Escambia

OATH

Ronald E. Ginsbach, the person bringing this complaint, being first duly sworn, do depose on oath and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge.

*Ronald E. Ginsbach*  
Signature of Complainant

Sworn to and subscribed before me

this 4<sup>th</sup> day of April 19 86

*John H. [Signature]*  
Notary Public

NOTE: The Division of Elections investigative authority is limited to violations of Chapter 105, Florida Statutes. Pursuant to Section 106.25, Florida Statutes, this complaint must remain confidential until a final disposition is made by the Florida Election Commission.

FILED STATE OF FLORIDA AT TALLAHASSEE  
APR 15 1986  
MAILED THROUGH MURDOGH-ASTON, INC.



Norothy W. Gilson  
Deputy Secretary for Elections  
Department of State  
Florida Division of Elections, Room 1801  
The Capitol  
Tallahassee, Florida 32301

11. 1986  
RECEIVED  
133 MAR 18 AM 11:30

Dear Mrs. Glisson:

Several apparent improprieties of political contributions and improper accounting and reporting procedures of Escambia County Victory 84' and Escambia County Republican Executive Committee Treasury practices have been brought to my attention. For example several items of questionable nature in an Escambia County Republican Executive Committee Report dated 11-2-84 require clarification.

The first entry is a contribution from "Republican Victory Fund" dated 10-11-84 for \$500.00. Who authorized contributions that were supposedly intended to Reagan-Bush re-election to be deposited in the Escambia County Republican Executive Committee Treasury? On what authority was this decision based? Who were the original contributors of \$500.00? Is it a general practice that contributions raised for one political cause to be diverted to another political cause without the approval of the original donors?

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97040634541

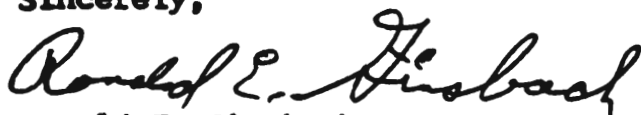
The office of the Chairman of the Republican Party of the State of Florida instructed all County Committee Chairmen to set up a separate account for the Victory 84' Fund under the County Executive Committee. The co-chairman of Victory 84' in Escambia County informed me that no donation expenditure reports were required to be filed. Is this statement true? No reports were filed anywhere to the best of my knowledge. I enclose a copy of the reply to my letter from the Secretary of State, Division of Elections, State of Florida.

The Escambia County Republican Executive Committee Chairman has stated that the expenditure of Victory 84' funds deposited in the Escambia County Republican Executive Committee Treasury did not require full Executive Committee approval but only the approval of the two co-chairmen for Victory 84'. Can any funds deposited in a County Executive Committee Treasury be expended without that committee's authorization? If so, please cite the authority allowing this.

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Sincerely,



Ronald E. Ginsbach  
Republican Precinct Committeeman, Precinct #99  
6901-A Esther St.  
Pensacola, Fl 32506  
Telephone 456-8820

2 enclosures

REG/jpn

2

**E**

DAMARIS M. ELIOTTE, 577-62-0887 11/81

16 BANK ROAD, BAY-484-0812

MIAMI, FL 33133

11-0-0

000000

*Pay to the order of*

*PAID*  
*One hundred*

\$ 100.00

*Dollar*



THE WESTERN BANK  
FLORIDA BANK  
10000 BROADWAY  
MIAMI, FLORIDA 33133

To

*Ben Elmore*

87040634542

*For deposit only*  
*to bank*

RECEIVED

62-01-2501

INT. 3/84





# Supervisor of Elections Escambia County

**JOE OLDMIXON**  
SUPERVISOR OF ELECTIONS

March 20, 1986

Room 400, County Courthouse  
Post Office Box 12601  
Pensacola, Florida 32574-2601  
(904) 434-5796  
(SUNCOM) 237-5799

Mr. Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Ron:

In reply to your letter of March 11, 1986, the only portion of it that I can reply directly to is the portion concerning "the cash contribution of \$240.00 on 2-15-85, with no names or addressees". After calling Mr. Moore, the treasurer of the Republican Executive Committee at that time, he supplied me with the names and addresses of these contributors; copy enclosed.

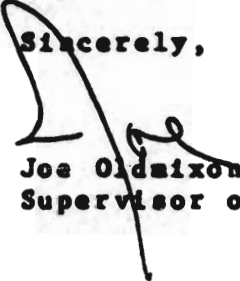
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Federal Election Commission  
1325 "K" Street NW  
Washington, D. C. 20463  
Phone: 202-523-4181  
or 1-800-424-9530

Mrs. Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Division of Elections  
Post Office Box 6508  
Tallahassee, Florida 32301  
Phone: 904-488-7690

Sorry I cannot be of more help to you.

Sincerely,

  
Joe Oldmixon  
Supervisor of Elections

JO/jk  
Enclosure

87040334543

4



FLORIDA DEPARTMENT OF STATE  
George Firestone  
Secretary of State

Dorothy W. Glisson  
Deputy Secretary For Elections

February 14, 1986

Republican Caucus  
Ronald E. Ginsbach, President  
Post Office Box 18582  
Pensacola, Florida 32523

Dear Mr. Ginsbach:

In response to your letter of February 12, we do not have a committee report for "Victory-84, Reagan-Bush Victory Fund" on file.

We do have the Federal Committee Reagan/Bush Campaign for 1984 and copies of the contribution reports for this committee would cost approximately \$500. Copies are 10c per page and there are about 5,000 pages of contributions.

Please let us know if we may be of any further assistance to you.

Sincerely,

*Dorothy W. Glisson*  
Dorothy W. Glisson  
Deputy Secretary for Elections

DWG/EB/ek

8704034544



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 8, 1986

Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

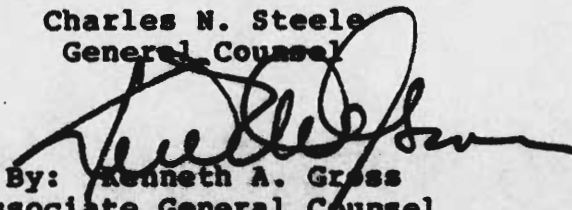
Dear Mr. Ginsbach:

This letter will acknowledge receipt of a complaint filed by you which we received on April 25, 1986, which alleges possible violations of the Federal Election Campaign Act of 1971, as amended, (the "Act"), by Vince Whibbs, Sr., Co-Chairman Victory '84 Fund and the Escambia County Republican Executive Committee. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints. We have numbered this matter under review MUR 2170. Please refer to this number in all future correspondence. If you have any questions, please contact Lorraine F. Ramos at (202) 376-3110.

Sincerely,

Charles N. Steele  
General Counsel

By:   
Associate General Counsel

Enclosure

P.S. This will acknowledge receipt of your letter dated April 16, 1986. MUR 2170 incorporates the complaint outlined in your earlier correspondence.

87040534545





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 8, 1986

Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

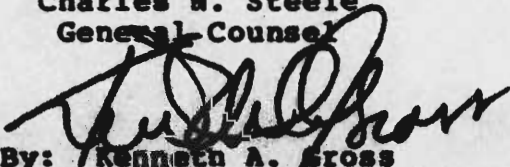
Dear Mr. Ginsbach:

This letter will acknowledge receipt of a complaint filed by you which we received on April 25, 1986, which alleges possible violations of the Federal Election Campaign Act of 1971, as amended, (the "Act"), by Dianna Rittenhouse, Co-Chairman, Victory '84 Fund and the Escambia County Republican Executive Committee. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints. We have numbered this matter under review MUR 2169. Please refer to this number in all future correspondence. If you have any questions, please contact Lorraine F. Ramos at (202) 376-3110.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosure

P.S. This will acknowledge receipt of your letter dated April 16, 1986. MUR 2169 incorporates the complaint outlined in your earlier correspondence.

87040334546



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

May 8, 1986

Dianna Rittenhouse  
Co-Chairman, Victory '84 Fund  
6234 Appomattox Drive  
Pensacola, Fl. 32503

Re: MUR 2169

Dear Ms. Rittenhouse:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that you, as Co-Chairman of the Victory '84 Fund may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2169. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

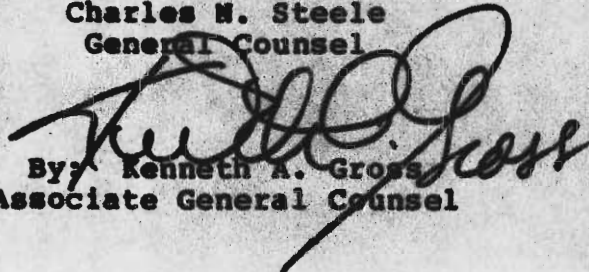
87040634547

-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles M. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel

87040634548





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

May 8, 1986

**Escambia County Republican Executive Committee**  
6234 Appomattox Dr.  
Pensacola, Florida 32503

**Re: MUR 2169**

**Dear Sir/Madam:**

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Escambia County Republican Executive Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2169. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

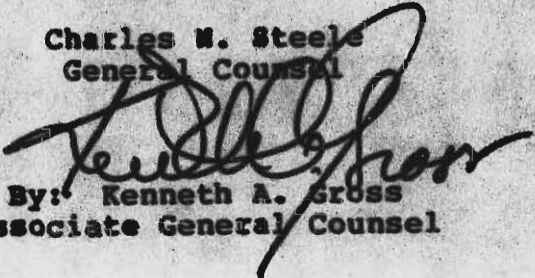
87040534549

-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202)376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles M. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel Statement

87040634550



**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Mr. Ginsbach:

This letter will acknowledge receipt of a complaint filed by you which we received on April 25, 1986, which alleges possible violations of the Federal Election Campaign Act of 1971, as amended, (the "Act"), by Dianna Rittenhouse, Co-Chairman, Victory '84 Fund and the Escambia County Republican Executive Committee. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints. We have numbered this matter under review MUR 2169. Please refer to this number in all future correspondence. If you have any questions, please contact Lorraine F. Ramos at (202) 376-3110.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure

P.S. This will acknowledge receipt of your letter dated April 16, 1986. MUR 2169 incorporates the complaint outlined in your earlier correspondence.

*rec 5/6/86*

87040534551





**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

Escambia County Republican Executive Committee  
6234 Appomattox Dr.  
Pensacola, Florida 32503

Re: MUR 2169

Dear Sir/Madam:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Escambia County Republican Executive Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2169. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

reg 5/6/86

87040534552

-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202)376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel Statement

87040634553



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

Dianna Rittenhouse  
Co-Chairman, Victory '84 Fund  
6234 Appomattox Drive  
Pensacola, Fl. 32503

Re: MUR 2169

Dear Ms. Rittenhouse:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that you, as Co-Chairman of the Victory '84 Fund may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2169. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

*Recy 5/6/86*

8704034554



-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel

87040534555



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

May 8, 1986

Vince Whibbs, Sr.  
Co-Chairman, Victory '84 Fund  
Pensacola, Fl. 32505

Re: MUR 2170

Dear Mr. Whibbs:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that you, as Co-Chairman of the Victory '84 Fund may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2170. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and your committee in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

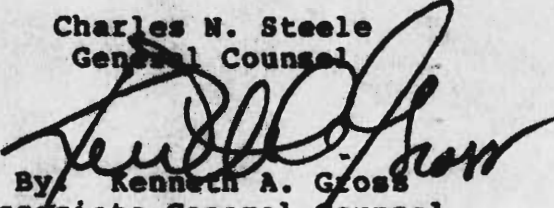
87040534556

-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202)376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel Statement

87040434557





**FEDERAL ELECTION COMMISSION**  
WASHINGTON, D.C. 20463

May 8, 1986

**Escambia County Republican Executive Committee**  
6234 Appomattox Dr.  
Pensacola, Florida 32503

**Re: MUR 2176**

**Dear Sir/Madam:**

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Escambia County Republican Executive Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2176. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

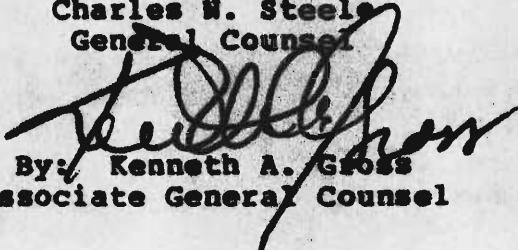
87040534558

-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles W. Steele  
General Counsel

  
By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel

87040534559



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Mr. Ginsbach:

This letter will acknowledge receipt of a complaint filed by you which we received on April 25, 1986, which alleges possible violations of the Federal Election Campaign Act of 1971, as amended, (the "Act"), by Vince Whibbs, Sr., Co-Chairman Victory '84 Fund and the Escambia County Republican Executive Committee. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedures for handling complaints. We have numbered this matter under review MUR 2170. Please refer to this number in all future correspondence. If you have any questions, please contact Lorraine F. Ramos at (202) 376-3110.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosure

P.S. This will acknowledge receipt of your letter dated April 16, 1986. MUR 2170 incorporates the complaint outlined in your earlier correspondence.

per 5/15

87040534560





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

Vince Whibbs, Sr.  
Co-Chairman, Victory '84 Fund  
Pensacola, Fl. 32505

Re: MUR 2170

Dear Mr. Whibbs:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that you, as Co-Chairman of the Victory '84 Fund may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2170. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you and your committee in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

See 5/6

87040534561

-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202)376-8200. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles M. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel Statement

87040334562



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

Escambia County Republican Executive Committee  
6234 Appomattox Dr.  
Pensacola, Florida 32503

Re: MUR 2170

Dear Sir/Madam:

This letter is to notify you that the Federal Election Commission received a complaint which alleges that the Escambia County Republican Executive Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended (the "Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 2170. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

This matter will remain 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 matter to be made public.

see 5/6

87040634563



-2-

If you have any questions, please contact Shelley Garr, the staff member assigned to this matter, at (202) 376-8200. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Charles N. Steele  
General Counsel

By: Kenneth A. Gross  
Associate General Counsel

Enclosures  
Complaint  
Procedures  
Designation of Counsel

87040634564

Glisson  
Earl

Mar 11, 1986

1986 MAR 18 AM 11:30

MUR2170

**CONFIDENTIAL**  
DEPARTMENT OF STATE DIVISION OF ELECTIONS  
Post Office Box 6882  
Tallahassee, Florida 32306  
**COMPLAINT**

and im-  
Victory  
ry practices  
of question-  
tee Report

Person bringing complaint:  
Name: Ronald E. Ginsbach Telephone Number: 904-456-8820  
Address: 6901-A Esther Street Zip Code: 32506  
City: Pensacola, Florida

RESPONDENT (person or committee complained against. List one person or committee per complaint form):  
Name: Vince Whibbs, Sr. - Victory-84 Co-Chairman Telephone Number: 904-433-7671  
Address: 3401 Navy Blvd. Zip Code: 32505  
City: Pensacola, Florida

- ALLEGED VIOLATIONS:
1. Failure to report receipt or disbursement of funds, in any way.
  2. Receiving funds under one name and causing them to be deposited under another name.
  3. Receiving cash contributions with no names or addresses.
  4. Total and purposeful disregard for established procedures for receiving, reporting and disbursement of political contributions.
- See attached pages 1 thru 5.

STATE OF FLORIDA  
COUNTY OF Escambia

I, Ronald E. Ginsbach, the person bringing this complaint, being first duly sworn, do depose on oath and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge.

Sworn to and subscribed before me  
this 11 day of April, 1986

NOTE: The Division of Elections investigative authority is limited to violations of Chapter 100, Florida Statutes. Pursuant to Section 100.25, Florida Statutes, this complaint must remain confidential until a final disposition is made by the Florida Elections Commission.

Ronald E. Ginsbach  
Signature of Complainant

Arthur H. Hays  
Notary Public

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES MAR. 15, 1988  
BONDED THROUGH HUNTER-ASHFORD, INC.

Contribution of \$642.00 from  
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n causes, this may not continue  
has Mrs. Dillion been informed  
by whom? If not, why hasn't

MUR2170

CONFIDENTIAL  
DEPARTMENT OF STATE DIVISION OF ELECTIONS  
Post Office Box 600  
Tallahassee, Florida 32301  
COMPLAINT

*Richard*

COMPLAINANT (person bringing complaint)

Name Ronald E. Ginsbach Telephone Number 904-456-8820  
Address 6901-A Esther Street  
City Pensacola, Florida Zip Code 32506

RESPONDENT (person or committee complained against. If both person or committee per complaint form)

Name Vince Whibbs, Sr. Victory-84 Co-Chairman Telephone Number 904-433-7671  
Address 3401 Navy Blvd.  
City Pensacola, Florida Zip Code 32505

*OK*  
ALSOED VIOLATIONS:

1. Failure to report receipt or disbursement of funds, in any way.
  2. Receiving funds under one name and causing them to be deposited under another name.
  3. Receiving cash contributions with no names or addresses.
  4. Total and purposeful disregard for established procedures for receiving, reporting and disbursement of political contributions.
- See attached pages 1 thru 5.

RECEIVED  
DIVISION OF ELECTIONS  
TALLAHASSEE, FLORIDA  
APR 17 PM 2:13  
JANSON & ELLIOTT  
ATTORNEYS AT LAW

STATE OF FLORIDA  
COUNTY OF Escambia

OATH

I, Ronald E. Ginsbach, person bringing this complaint, being first duly sworn, do depose on oath and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge.

Ronald E. Ginsbach  
Signature of Complainant

Sworn to and subscribed before me

this 4th day of April, 1986

Atty. Gen.  
Notary Public

NOTE: The Division of Elections investigative authority is limited to violations of Chapter 99, Florida Statutes. Pursuant to Section 100.15, Florida Statutes, this complaint must remain confidential until a final disposition is made by the Florida Election Commission.

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES MAR. 15, 1988  
BONDED THROUGH FINANCIAL-RENTAL INC

8 7 7 4 2 0 3 3 4 5 6 6

APR 23 12:21



Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Florida Division of Elections, Room 1801  
The Capitol  
Tallahassee, Florida 32301

11. 1986  
RECEIVED  
MAR 18 11:30  
OFFICE OF THE  
CLERK OF THE  
FLORIDA SUPREME COURT

Dear Mrs. Glisson:

Several apparent improprieties of political contributions and improper accounting and reporting procedures of Escambia County Victory 84' and Escambia County Republican Executive Committee Treasury practices have been brought to my attention. For example several items of questionable nature in an Escambia County Republican Executive Committee Report dated 11-2-84 require clarification.

The first entry is a contribution from "Republican Victory Fund" dated 10-11-84 for \$500.00. Who authorized contributions that were supposedly intended to Reagan-Bush re-election to be deposited in the Escambia County Republican Executive Committee Treasury? On what authority was this decision based? Who were the original contributors of \$500.00? Is it a general practice that contributions raised for one political cause to be diverted to another political cause without the approval of the original donors?

Next is a contribution from J. Terryl Bechtol in the amount of \$100.00 on 10-16-84. This check was payable to Victory 84', but was deposited in the Escambia County Republican Executive Committee Treasury. Who authorized this change in intended repositories without the knowledge and/or consent of the contributor? On what written authority was this decision based?

Another item brought to my attention is a contribution from Benjamin F. Elmore for \$100.00. This check was payable to Victory 84' but was deposited in the Escambia County Republican Executive Committee Treasury. The check (copy enclosed) was dated 10-10-84 and deposited 10-30-84. Mr. Elmore has stated that he emphatically told the co-chairman of Victory 84' that this money was strictly for Reagan-Bush and was definitely not to go to the Escambia County Republican Executive Committee. Who authorized this deposit in direct contradiction to the contributors expressed wishes? On what written authority was this decision based and by whom?

The next item of concern is a contribution by Barbara M. Dulton of \$250.00 dated 11-1-84. Mrs. Dulton is a registered Democrat. This check was payable to Victory 84' but was deposited in the Escambia County Republican Executive Committee Treasury. Who authorized the change of intended repositories in obvious contradiction to the contributors wishes? On what written authority was this accomplished? Where a lot of Democrats have and will continue to contribute to Republican causes, this may not continue if the funds are not placed where intended. Has Mrs. Dulton been informed of where her \$250.00 was deposited? If so, by whom? If not, why hasn't she been so informed?

Of additional serious concern is a contribution of \$642.00 from Victory 84' on 1-2-85. Where did this money come from? Who were the original contributors? In what amounts were the contributions? Why were these these deposits made 2 (two) months after the Victory 84' campaign terminated? Why were these contributions not returned to the original contributors, thanking them for contributing and for their support? Is this accepted practice? If so, what written publication authorizes these practices?

The next item of concern is the cash contribution of \$240.00 on 2-15-85, with no names or addresses. Where did this money come from?

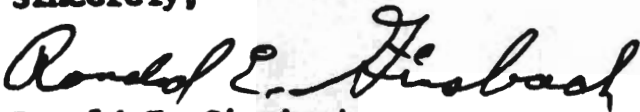
8704053456  
The office of the Chairman of the Republican Party of the State of Florida instructed all County Committee Chairmen to set up a separate account for the Victory 84' Fund under the County Executive Committee. The co-chairman of Victory 84' in Escambia County informed me that no donation expenditure reports were required to be filed. Is this statement true? No reports were filed anywhere to the best of my knowledge. I enclose a copy of the reply to my letter from the Secretary of State, Division of Elections, State of Florida.

The Escambia County Republican Executive Committee Chairman has stated that the expenditure of Victory 84' funds deposited in the Escambia County Republican Executive Committee Treasury did not require full Executive Committee approval but only the approval of the two co-chairmen for Victory 84'. Can any funds deposited in a County Executive Committee Treasury be expended without that committee's authorization? If so, please cite the authority allowing this.

It appears that several thousands of dollars in contributions and expenditures have not been properly accounted for, reported, or spent and may include large cash contributions, between March 1984 thru March 31, 1985.

Your assistance in resolving the answers to these questions is requested. My fears are that these funds were not properly collected, deposited, and reported as requested and intended. Specific answers to specific questions stated above are requested. Additionally, please advise which if any election law violations have occurred and what if any corrective actions should be taken and if so, by whom? Please provide a reply to this letter within thirty (30) days from the date of this letter. Your help in clarifying all of this will be greatly appreciated by all Republicans in Escambia County.

Sincerely,

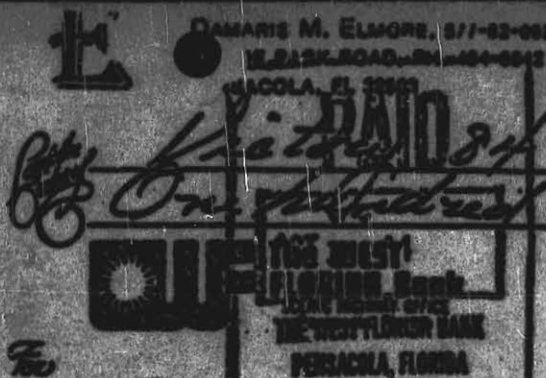


Ronald E. Ginsbach  
Republican Precinct Committeeman, Precinct #99  
6901-A Esther St.  
Pensacola, FL 32506  
Telephone 456-8820

2 enclosures

REG/jpn

MACOLA, FL 32563



Ben Elmore

887040634569

Fr dptaly  
to dest.

1941

421-3391

三：(三)





# Supervisor of Elections Escambia County

**JOE OLDMIXON**  
SUPERVISOR OF ELECTIONS

March 20, 1986

Room 400, County Courthouse  
Post Office Box 12601  
Pensacola, Florida 32574-2601  
(904) 436-5796  
(SUNCOM) 237-5799

Mr. Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Ron:

In reply to your letter of March 11, 1986, the only portion of it that I can reply directly to is the portion concerning "the cash contribution of \$240.00 on 2-15-85, with no names or addresses". After calling Mr. Moore, the treasurer of the Republican Executive Committee at that time, he supplied me with the names and addresses of these contributors; copy enclosed.

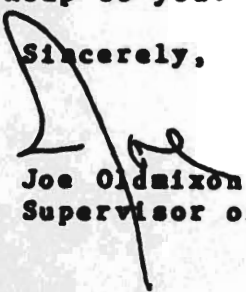
The election laws of Florida do not give me direct control over the contributions and expenditures of the Democratic and Republican Executive Committees. Therefore, I cannot give you any answers to any other questions in your letter. I would suggest that if you want further information you contact the Federal Election Commission or the Secretary of State's Office:

Federal Election Commission  
1325 "K" Street NW  
Washington, D. C. 20463  
Phone: 202-523-4181  
or 1-800-424-9530

Mrs. Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Division of Elections  
Post Office Box 6508  
Tallahassee, Florida 32301  
Phone: 904-488-7690

Sorry I cannot be of more help to you.

Sincerely,

  
Joe Oldmixon  
Supervisor of Elections

JO/jk  
Enclosure

87040634570



FLORIDA DEPARTMENT OF STATE  
George Firestone  
Secretary of State

Dorothy W. Glisson  
Deputy Secretary For Elections

February 14, 1986

Republican Caucus  
Ronald E. Ginsbach, President  
Post Office Box 18582  
Pensacola, Florida 32523

Dear Mr. Ginsbach:

In response to your letter of February 12, we do not have a committee report for "Victory-84, Reagan-Bush Victory Fund" on file.

We do have the Federal Committee Reagan/Bush Campaign for 1984 and copies of the contribution reports for this committee would cost approximately \$500. Copies are 10c per page and there are about 5,000 pages of contributions.

Please let us know if we may be of any further assistance to you.

Sincerely,

*Dorothy W. Glisson*  
Dorothy W. Glisson  
Deputy Secretary for Elections

DWG/EB/ek

MUR 2/17

**CONFIDENTIAL**  
DEPARTMENT OF STATE/DIVISION OF ELECTIONS  
Post Office Box 6888  
Tallahassee, Florida 32311  
**COMPLAINT**

*Revised*

COMPLAINANT (person bringing complaint):

Name: Ronald E. Ginsbach Telephone Number: 904-456-8829  
Address: 6901-A Esther Street  
City: Pensacola, Florida Zip Code: 32506

RESPONDENT (person or committee complained against. Limit one person or committee per complaint form):

Name: Vince Whibbe, Sr. - Victory-84 Co-Chairman Telephone Number: 904-433-7671  
Address: 3401 Navy Blvd.  
City: Pensacola, Florida Zip Code: 32505

*Re 7*

ALLEGED VIOLATIONS:

1. Failure to report receipt or disbursement of funds, in any way.
  2. Receiving funds under one name and causing them to be deposited under another name.
  3. Receiving cash contributions with no names or addresses.
  4. Total and purposeful disregard for established procedures for receiving, reporting and disbursement of political contributions.
- See attached pages 1 thru 5.

87040634572

ED  
NOTED  
COMPLAINTARY

23 APR 23 12:21

RECEIVED  
DIVISION OF ELECTIONS  
APR 17 1984  
TALLAHASSEE, FLORIDA

(continue on reverse side if necessary)

STATE OF FLORIDA  
COUNTY OF Escambia

OATH

I, Ronald E. Ginsbach, person bringing this complaint, being first duly sworn, do depose on oath and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge.

Ronald E. Ginsbach  
Signature of Complainant

Sworn to and subscribed before me  
this 11<sup>th</sup> day of April, 1984

John Hand  
Notary Public

NOTE: The Division of Elections investigative authority is limited to violations of Chapter 105, Florida Statutes. Pursuant to Section 105.25, Florida Statutes, this complaint must remain confidential until a final disposition is made by the Florida Elections Commission.

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES MAR. 15, 1989  
BONDED THROUGH BUREAU-ADVERTON, INC.

50-20-0  
0-00



Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Florida Division of Elections, Room 1801  
The Capitol  
Tallahassee, Florida 32301

Mar 11, 1986

RECEIVED  
MAR 12 1986  
11:30

Dear Mrs. Glisson:

Several apparent improprieties of political contributions and improper accounting and reporting procedures of Escambia County Victory 84' and Escambia County Republican Executive Committee Treasury practices have been brought to my attention. For example several items of questionable nature in an Escambia County Republican Executive Committee Report dated 11-2-84 require clarification.

The first entry is a contribution from "Republican Victory Fund" dated 10-11-84 for \$500.00. Who authorized contributions that were supposedly intended to Reagan-Bush re-election to be deposited in the Escambia County Republican Executive Committee Treasury? On what authority was this decision based? Who were the original contributors of \$500.00? Is it a general practice that contributions raised for one political cause to be diverted to another political cause without the approval of the original donors?

Next is a contribution from J. Terryl Bechtol in the amount of \$100.00 on 10-16-84. This check was payable to Victory 84', but was deposited in the Escambia County Republican Executive Committee Treasury. Who authorized this change in intended repositories without the knowledge and/or consent of the contributor? On what written authority was this decision based?

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It appears that several thousands of dollars in contributions and expenditures have not been properly accounted for, reported, or spent and may include large cash contributions, between March 1984 thru March 31, 1985.

Your assistance in resolving the answers to these questions is requested. My fears are that these funds were not properly collected, deposited, and reported as requested and intended. Specific answers to specific questions stated above are requested. Additionally, please advise which if any election law violations have occurred and what if any corrective actions should be taken and if so, by whom? Please provide a reply to this letter within thirty (30) days from the date of this letter. Your help in clarifying all of this will be greatly appreciated by all Republicans in Escambia County.

Sincerely,



Ronald E. Ginsbach  
Republican Precinct Committeeman, Precinct #99  
6901-A Esther St.  
Pensacola, FL 32506  
Telephone 456-8820

2 enclosures

REG/jpn

87040634575

*For deposit only  
to bank*

PARANALIN, REC.  
K  
62-101-12391

AT 10/64

AMARIS M. ELMORE 5/1-62-1957 11/61  
12 BARK ROAD, RM-44-2912  
MACOLA, FL 32903

*PAID*  
*One hundred*

11-0-9 65702

15 100-

*Deft*

**THE WEST FLORIDA BANK**  
ONE HUNDRED  
THE WEST FLORIDA BANK  
PENSACOLA, FLORIDA

*Ben Elmore*





## Supervisor of Elections Escambia County

**JOE OLDMIXON**  
SUPERVISOR OF ELECTIONS

March 20, 1986

Room 400, County Courthouse  
Post Office Box 12601  
Pensacola, Florida 32574-2101  
(904) 436-5796  
(SUNCOM) 237-5799

Mr. Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Ron:

In reply to your letter of March 11, 1986, the only portion of it that I can reply directly to is the portion concerning "the cash contribution of \$240.00 on 2-15-85, with no names or addresses". After calling Mr. Moore, the treasurer of the Republican Executive Committee at that time, he supplied me with the names and addresses of these contributors; copy enclosed.

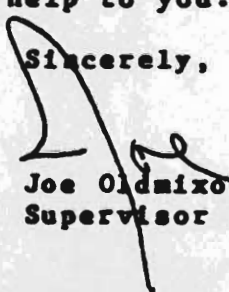
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Federal Election Commission  
1325 "K" Street NW  
Washington, D. C. 20463  
Phone: 202-523-4181  
or 1-800-424-9530

Mrs. Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Division of Elections  
Post Office Box 6508  
Tallahassee, Florida 32301  
Phone: 904-488-7690

Sorry I cannot be of more help to you.

Sincerely,

  
Joe Oldmixon  
Supervisor of Elections

JO/jk  
Enclosure

87040634576



FLORIDA DEPARTMENT OF STATE  
George Firestone  
Secretary of State

Dorothy W. Glisson  
Deputy Secretary For Elections

February 14, 1986

Republican Caucus  
Ronald E. Ginsbach, President  
Post Office Box 18582  
Pensacola, Florida 32523

Dear Mr. Ginsbach:

In response to your letter of February 12, we do not have a committee report for "Victory-84, Reagan-Bush Victory Fund" on file.

We do have the Federal Committee Reagan/Bush Campaign for 1984 and copies of the contribution reports for this committee would cost approximately \$500. Copies are 10¢ per page and there are about 5,000 pages of contributions.

Please let us know if we may be of any further assistance to you.

Sincerely,

*Dorothy W. Glisson*  
Dorothy W. Glisson  
Deputy Secretary for Elections

DWG/EB/ek

FLORIDA State of the Arts

DIVISION OF ELECTIONS, Room 1801, The Capitol, Tallahassee, Florida 32301  
(904) 488-7690

5

87040634577

**CONFIDENTIAL**  
DEPARTMENT OF STATE DIVISION OF ELECTIONS  
Post Office Box 6800  
Tallahassee, Florida 32301  
**COMPLAINT**

*Federal*

16 APR 28 1986

COMPLAINANT (person bringing complaint):

Name: Ronald E. Ginsbach Telephone Number: 904-456-8820  
Address: 6901-A Esther Street  
City: Pensacola, Florida Zip Code: 32506

RESPONDENT (person or committee complained against, limit one person or committee per complaint form):

Name: Diana Rittenhouse - Victory-84 Co-Chairman Telephone Number: 904-476-3879  
Address: 6234 Annapolis Drive  
City: Pensacola, Florida Zip Code: 32503

*RE* ALLEGED VIOLATIONS:

1. Failure to report the receipt or disbursement of funds with full knowledge of the requirements to do so for all political contributions.
  2. Receiving funds under one fund name and causing them to be deposited under a totally different name and intent.
  3. Possibly causing funds to be collected under one candidate for federal office fund to be used for furthering another candidate for federal office's campaign.
  4. Total, purposeful and blanton disregard for established procedures for receiving, reporting and disbursing political contributions.
  5. Receiving cash contributions with no names and addresses, and then later furnishing what might be fictitious names.
- See attached pages 1 thru 5.

(continue on reverse side if necessary)

STATE OF FLORIDA  
COUNTY OF Escambia

OATH

Ronald E. Ginsbach the person bringing this complaint, being first duly sworn, do depose on oath and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge.

*Ronald E. Ginsbach*  
Signature of Complainant

Sworn to and subscribed before me

this 4<sup>th</sup> day of April 1986

*John Hays*  
Notary Public

NOTE: The Division of Elections investigative authority is limited to violations of Chapter 105, Florida Statutes. Pursuant to Section 105.26, Florida Statutes, this complaint must remain confidential until a final disposition is made by the Florida Elections Commission.

NOTED BY THE STATE OF FLORIDA AT LAP  
APR 15 1986  
SOLVED THROUGH MUNDSON-ASHOR, INC

DE-02-05  
000

87040634578

22 APR 23 1986



Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Florida Division of Elections, Room 1801  
The Capitol  
Tallahassee, Florida 32301

March 11, 1986

RECEIVED  
COMMUNICATIONS SECTION  
MAR 18 1986  
TALLAHASSEE, FLORIDA

Dear Mrs. Glisson:

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97040634579

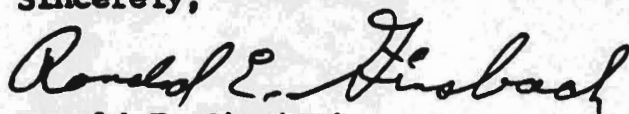
87040634590  
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Sincerely,



Ronald E. Ginsbach  
Republican Precinct Committeeman, Precinct #99  
6901-A Esther St.  
Pensacola, Fl 32506  
Telephone 456-8820

2 enclosures

REG/jpn

2

87040634581

*For deposit only  
Do not cash*

PAID TO ORDER

NOV 11 1961

11/11/61

**E**

DAMARIS M. ELMORE 5/1-62-0657 11/61

16 BASIL ROAD, COLUMBIA, MISSISSIPPI

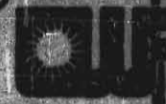
PERRACOLA, FL 33905

**PAID**

*One hundred*

\$ 100.00

*Delmas*



100 WEST  
FLORIDA BANK  
2000 MARKET STREET  
PERRACOLA, FLORIDA

*Ben Elmore*





## Supervisor of Elections Escambia County

**JOE OLDMIXON**  
SUPERVISOR OF ELECTIONS

March 20, 1986

Room 400, County Courthouse  
Post Office Box 12601  
Pensacola, Florida 32574-2601  
(904) 436-5796  
(SUNCOM) 237-5799

Mr. Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Ron:

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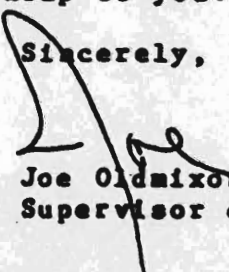
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Phone: 202-523-4181  
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Mrs. Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Division of Elections  
Post Office Box 6508  
Tallahassee, Florida 32301  
Phone: 904-488-7690

Sorry I cannot be of more help to you.

Sincerely,

  
Joe Oldmixon  
Supervisor of Elections

JO/jk  
Enclosure

87040634582

4



FLORIDA DEPARTMENT OF STATE  
George Firestone  
Secretary of State

Dorothy W. Glisson  
Deputy Secretary For Elections

February 14, 1986

Republican Caucus  
Ronald E. Ginsbach, President  
Post Office Box 18582  
Pensacola, Florida 32523

Dear Mr. Ginsbach:

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We do have the Federal Committee Reagan/Bush Campaign for 1984 and copies of the contribution reports for this committee would cost approximately \$500. Copies are 10¢ per page and there are about 5,000 pages of contributions.

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Sincerely,

*Dorothy W. Glisson*  
Dorothy W. Glisson  
Deputy Secretary for Elections

DWG/EB/ek

**FLORIDA-State of the Arts**

DIVISION OF ELECTIONS, Room 1801, The Capitol, Tallahassee, Florida 32301  
(904) 488-7690

5

87040534583



RECEIVED AT THE FEC  
86 APR 21 11:05 AM  
900#072

FLORIDA DEPARTMENT OF STATE  
George Firestone  
Secretary of State

Dorothy W. Glisson  
Deputy Secretary For Elections

86 APR 21 11:41

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

April 16, 1986

Federal Elections Commission  
Washington, D. C. 20463

Dear Sirs:

Enclosed are the following complaints which were filed with this office.

They are Ronald E. Ginesbach vs. Vince Whibbs, Sr.; Ronald E. Ginsbach vs. Dianna Rittenhouse, Victory-84, Co-chairman; and, Ronald E. Ginsbach vs. Victory-84 Fund Co-chairman.

Since Victory-84, I believe, was a federal committee, the complaints are being sent to you for whatever action you deem necessary.

Sincerely,

*Dorothy W. Glisson*  
Dorothy W. Glisson  
Deputy Secretary for Elections

DWG/pr

Enclosures

cc: Mr. Ronald E. Ginsbach

8704034584



8 7 0 4 0 6 3 4 5 5

# CONFIDENTIAL

DEPARTMENT OF STATE/DIVISION OF ELECTIONS

Post Office Box 6508  
Tallahassee, Florida 32301

## COMPLAINT

*Referred*

COMPLAINANT (person bringing complaint):

Name: Ronald E. Ginsbach

Telephone Number: 904-456-8820

Address: 6901-A Esther Street

City: Pensacola, Florida

Zip Code: 32506

RESPONDENT (person or committee complained against, limit one person or committee per complaint form):

Name: Vince Whibbs, Sr.

Telephone Number: 904-433-7671

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City: Pensacola, Florida

Zip Code: 32505

*Referred*

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2. Receiving funds under one name and causing them to be deposited under another name.
3. Receiving cash contributions with no names or addresses.
4. Total and purposeful disregard for established procedures for receiving, reporting and disbursement of political contributions.

See attached pages 1 thru 5.

RECEIVED  
DEPARTMENT OF STATE  
DIVISION OF ELECTIONS  
TALLAHASSEE, FLORIDA  
1986 APR -7 PM 2:13

(continue on reverse side if necessary)

STATE OF FLORIDA

COUNTY OF Escambia

### OATH

I, Ronald E. Ginsbach, the person bringing this complaint, being first duly sworn, do depose on oath and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge.

Ronald E. Ginsbach  
Signature of Complainant:

Sworn to and subscribed before me

this 4<sup>th</sup> day of April 19 86

Notary Public  
Notary Public

NOTE: The Division of Elections investigative authority is limited to violations of Chapter 106, Florida Statutes. Pursuant to Section 106.25, Florida Statutes, this complaint must remain confidential until a final disposition is made by the Florida Elections Commission.

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
MY COMMISSION EXPIRES MAR. 15, 1988  
BONDED THROUGH MUROSKE-ASHTON, INC.

Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Florida Division of Elections, Room 1801  
The Capitol  
Tallahassee, Florida 32301

March 11, 1986  
**RECEIVED**  
DEPARTMENT OF STATE  
1986 MAR 18 AM 11:30  
DIVISION OF ELECTIONS  
TALLAHASSEE, FLORIDA

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Sincerely,

*Ronald E. Ginsbach*

Ronald E. Ginsbach  
Republican Precinct Committeeman, Precinct #99  
6901-A Esther St.  
Pensacola, FL 32506  
Telephone 456-8820

2 enclosures

REG/jpn



**E**

JAMARIS M. ELMORE 77-63-0867 11/81

12 PARK ROAD, RM. 404-3642

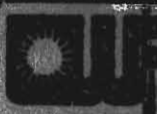
PACOLA, FL 38603

11-0-9 00000

*PAID*  
*On 11/11/81*

\$100-

*Delivered*



THE WEST  
FLORIDA BANK  
1000 N. W. 10th St.  
PENSACOLA, FLORIDA

*Ben Elmore*

87040634588

*For deposit only  
Do not cash*

FR / ADV 11/11/81

602-501-3501

11/11/81



# Supervisor of Elections Escambia County

**JOE OLDMIXON**  
SUPERVISOR OF ELECTIONS

March 20, 1986

Room 400, County Courthouse  
Post Office Box 12601  
Pensacola, Florida 32574-2601  
(904) 436-5796  
(SUNCOM) 237-5799

Mr. Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Ron:

In reply to your letter of March 11, 1986, the only portion of it that I can reply directly to is the portion concerning "the cash contribution of \$240.00 on 2-15-85, with no names or addresses". After calling Mr. Moore, the treasurer of the Republican Executive Committee at that time, he supplied me with the names and addresses of these contributors; copy enclosed.

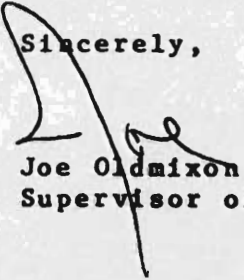
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Federal Election Commission  
1325 "K" Street NW  
Washington, D. C. 20463  
Phone: 202-523-4181  
or 1-800-424-9530

Mrs. Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Division of Elections  
Post Office Box 6508  
Tallahassee, Florida 32301  
Phone: 904-488-7690

Sorry I cannot be of more help to you.

Sincerely,

  
Joe Oldmixon  
Supervisor of Elections

JO/jk  
Enclosure





FLORIDA DEPARTMENT OF STATE  
George Firestone  
Secretary of State

Dorothy W. Glisson  
Deputy Secretary For Elections

February 14, 1986

Republican Caucus  
Ronald E. Ginsbach, President  
Post Office Box 18582  
Pensacola, Florida 32523

Dear Mr. Ginsbach:

In response to your letter of February 12, we do not have a committee report for "Victory-84, Reagan-Bush Victory Fund" on file.

We do have the Federal Committee Reagan/Bush Campaign for 1984 and copies of the contribution reports for this committee would cost approximately \$500. Copies are 10¢ per page and there are about 5,000 pages of contributions.

Please let us know if we may be of any further assistance to you.

Sincerely,

*Dorothy W. Glisson*  
Dorothy W. Glisson  
Deputy Secretary for Elections

DWG/EB/ek

FLORIDA State of the Arts

DIVISION OF ELECTIONS, Room 1801, The Capitol, Tallahassee, Florida 32301  
(904) 488-7690

87040634590

5



**CONFIDENTIAL**  
 DEPARTMENT OF STATE/DIVISION OF ELECTIONS  
 Post Office Box 6508  
 Tallahassee, Florida 32301  
**COMPLAINT**

*Federal*  
 1986 APR 21 PM 3:42

RECEIVED  
 OFFICE OF THE  
 GENERAL COUNSEL

## COMPLAINANT (person bringing complaint):

Name: Ronald E. Ginsbach Telephone Number: 904-456-8820  
 Address: 6901-A Esther Street  
 City: Pensacola, Florida Zip Code: 32506

## RESPONDENT (person or committee complained against, limit one person or committee per complaint form):

Name: Victory-84 Fund Co-Chairmen Telephone Number: \_\_\_\_\_  
 Address: 3401 Navy Blvd.  
 City: Pensacola, Florida Zip Code: 32505

*Re: 9*

## ALLEGED VIOLATION(S):

1. Failure to report receipt or disbursement of funds, in any way.
2. Receiving funds under one name and causing them to be deposited under another name.
3. Receiving cash contributions with no names or addresses.
4. Total and purposeful disregard for established procedures for receiving, reporting and disbursement of political contributions.

See attached pages 1 thru 5.

RECEIVED  
 DEPARTMENT OF STATE  
 1986 APR -7 PM 2:42  
 DIVISION OF ELECTIONS  
 TALLAHASSEE, FLORIDA

(continue on reverse side if necessary)

STATE OF FLORIDA

COUNTY OF Escambia

## OATH

I, Ronald E. Ginsbach, the person bringing this complaint, being first duly sworn, do depose on oath and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge.

*Ronald E. Ginsbach*  
 Signature of Complainant

Sworn to and subscribed before me

this 4<sup>th</sup> day of April 19 86

*Notary Public*  
 Notary Public

NOTE: The Division of Elections investigative authority is limited to violations of Chapter 106, Florida Statutes. Pursuant to Section 106.25, Florida Statutes, this complaint must remain confidential until a final disposition is made by the Florida Elections Commission.

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
 MY COMMISSION EXPIRES MAR. 15, 1989  
 BONDED THROUGH MURDOSKI-ASHTON, INC.

Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Florida Division of Elections, Room 1801  
The Capitol  
Tallahassee, Florida 32301

March 11, 1986

RECEIVED  
DEPARTMENT OF STATE  
MAR 18 AM 11:30  
DIVISION OF ELECTIONS  
TALLAHASSEE, FLORIDA

Dear Mrs. Glisson:

Several apparent improprieties of political contributions and improper accounting and reporting procedures of Escambia County Victory 84' and Escambia County Republican Executive Committee Treasury practices have been brought to my attention. For example several items of questionable nature in an Escambia County Republican Executive Committee Report dated 11-2-84 require clarification.

The first entry is a contribution from "Republican Victory Fund" dated 10-11-84 for \$500.00. Who authorized contributions that were supposedly intended to Reagan-Bush re-election to be deposited in the Escambia County Republican Executive Committee Treasury? On what authority was this decision based? Who were the original contributors of \$500.00? Is it a general practice that contributions raised for one political cause to be diverted to another political cause without the approval of the original donors?

Next is a contribution from J. Terryl Bechtol in the amount of \$100.00 on 10-16-84. This check was payable to Victory 84", but was deposited in the Escambia County Republican Executive Committee Treasury. Who authorized this change in intended repositories without the knowledge and/or consent of the contributor? On what written authority was this decision based?

Another item brought to my attention is a contribution from Benjamin F. Elmore for \$100.00. This check was payable to Victory 84' but was deposited in the Escambia County Republican Executive Committee Treasury. The check (copy enclosed) was dated 10-10-84 and deposited 10-30-84. Mr. Elmore has stated that he emphatically told the co-chairman of Victory 84' that this money was strictly for Reagan-Bush and was definitely not to go to the Escambia County Republican Executive Committee. Who authorized this deposit in direct contradiction to the contributors expressed wishes? On what written authority was this decision based and by whom?

The next item of concern is a contribution by Barbara N. Dulton of \$250.00 dated 11-1-84. Mrs. Dulton is a registered Democrat. This check was payable to Victory 84' but was deposited in the Escambia County Republican Executive Committee Treasury. Who authorized the change of intended repositories in obvious contradiction to the contributors wishes? On what written authority was this accomplished? Where a lot of Democrats have and will continue to contribute to Republican causes, this may not continue if the funds are not placed where intended. Has Mrs. Dulton been informed of where her \$250.00 was deposited? If so, by whom? If not, why hasn't she been so informed?

Of additional serious concern is a contribution of \$642.00 from Victory 84" on 1-2-85. Where did this money come from? Who were the original contributors? In what amounts were the contributions? Why were these these deposits made 2 (two) months after the Victory 84' campaign terminated? Why were these contributions not returned to the original contributors, thanking them for contributing and for their support? Is this accepted practice? If so, what written publication authorizes these practices?

The next item of concern is the cash contribution of \$240.00 on 2-15-85, with no names or addresses. Where did this money come from?

87040534592

10-07  
(Bk. 1)



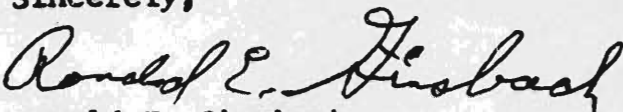
8 7 0 4 0 3 3 4 5 9 3  
The office of the Chairman of the Republican Party of the State of Florida instructed all County Committee Chairman to set up a separate account for the Victory 84' Fund under the County Executive Committee. The co-chairman of Victory 84' in Escambia County informed me that no donation expenditure reports were required to be filed. Is this statement true? No reports were filed anywhere to the best of my knowledge. I enclose a copy of the reply to my letter from the Secretary of State, Division of Elections, State of Florida.

The Escambia County Republican Executive Committee Chairman has stated that the expenditure of Victory 84' funds deposited in the Escambia County Republican Executive Committee Treasury did not require full Executive Committee approval but only the approval of the two co-chairmen for Victory 84'. Can any funds deposited in a County Executive Committee Treasury be expended without that committee's authorization? If so, please cite the authority allowing this.

It appears that several thousands of dollars in contributions and expenditures have not been properly accounted for, reported, or spent and may include large cash contributions, between March 1984 thru March 31, 1985

Your assistance in resolving the answers to these questions is requested. My fears are that these funds were not properly collected, deposited, and reported as requested and intended. Specific answers to specific questions stated above are requested. Additionally, please advise which if any election law violations have occurred and what if any corrective actions should be taken and if so, by whom? Please provide a reply to this letter within thirty (30) days from the date of this letter. Your help in clarifying all of this will be greatly appreciated by all Republicans in Escambia County.

Sincerely,



Ronald E. Ginsbach  
Republican Precinct Committeeman, Precinct #99  
6901-A Esther St.  
Pensacola, Fl 32506  
Telephone 456-8820

2 enclosures

REG/jpn



87040334594

*For deposit only  
to bank*

PARAMOUNT, MEX.

ATLANTA, GA.  
602-51-52301

MT 3/84

**E**

DAMARIS M. ELMORE, 577-62-0857 11/81

12 BARN ROAD, PMB 484-8842

VERACOLA, FL 32083

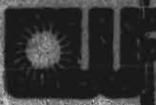
11-0-9

007488

*PAID*  
*On 11/81*

\$ 100.00

*D.M.*



THE FIRST  
FLORIDA BANK  
VERACOLA, FLORIDA

*D. M. Elmore*



## Supervisor of Elections Escambia County

**JOE OLDMIXON**  
SUPERVISOR OF ELECTIONS

March 20, 1986

Room 400, County Courthouse  
Post Office Box 12601  
Pensacola, Florida 32574-2601  
(904) 436-5796  
(SUNCOM) 237-5799

Mr. Ronald E. Ginsbach  
6901-A Esther Street  
Pensacola, Florida 32506

Dear Ron:

In reply to your letter of March 11, 1986, the only portion of it that I can reply directly to is the portion concerning "the cash contribution of \$240.00 on 2-15-85, with no names or addresses". After calling Mr. Moore, the treasurer of the Republican Executive Committee at that time, he supplied me with the names and addresses of these contributors; copy enclosed.

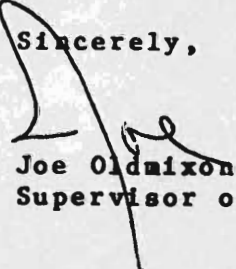
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Mrs. Dorothy W. Glisson  
Deputy Secretary for Elections  
Department of State  
Division of Elections  
Post Office Box 6508  
Tallahassee, Florida 32301  
Phone: 904-488-7690

Sorry I cannot be of more help to you.

Sincerely,

  
Joe Oldmixon  
Supervisor of Elections

JO/jk  
Enclosure

87040534595

4





FLORIDA DEPARTMENT OF STATE

George Firestone

Secretary of State

Dorothy W. Glisson  
Deputy Secretary For Elections

March 26, 1986

Mr. Ronald E. Ginsbach  
Republican Precinct Committeeman  
Precinct 99  
6901 - A Ester Street  
Pensacola, Florida 32506

Dear Mr. Ginsbach:

Your letter of March 11, has been received. Enclosed is a sworn complaint form which you may use to file a complaint with this office. We will then have an investigation made and present our findings to the Florida Election Commission.

The information which you submitted is returned, so it can be attached to the complaint.

Please let us know if we may be of assistance to you at any time.

Sincerely,

*Dorothy W. Glisson*  
Dorothy W. Glisson  
Deputy Secretary for Elections

DWG:nd

Enclosures

87040534596

5



**CONFIDENTIAL**  
DEPARTMENT OF STATE/DIVISION OF ELECTIONS  
Post Office Box 6508  
Tallahassee, Florida 32301  
**COMPLAINT**

*Federal*

86 APR 21 PM 3:42

RECEIVED  
OFFICE OF THE  
GENERAL COUNSEL

COMPLAINANT (person bringing complaint):

Name: Ronald E. Ginsbach Telephone Number: 904-456-8820  
Address: 6901-A Esther Street  
City: Pensacola, Florida Zip Code: 32506

RESPONDENT (person or committee complained against, limit one person or committee per complaint form):

Name: Dianna Rittenhouse-Victory-84 Co-Chairman Telephone Number: 904-476-3879  
Address: 6234 Appomattox Drive  
City: Pensacola, Florida Zip Code: 32503

*AL*

ALLEGED VIOLATION(S):

1. Failure to report the receipt or disbursement of funds with full knowledge of the requirements to do so for all political contributions.
  2. Receiving funds under one fund name and causing them to be deposited under a totally different name and intent.
  3. Possibly causing funds to be collected under one candidate for federal office fund to be used for furthering another candidate for federal office's campaign.
  4. Total, purposeful and blanton disregard for established procedures for receiving, reporting and disbursing political contributions.
  5. Receiving cash contributions with no names and addresses, and then later furnishing what might be fictitious names.
- See attached pages 1 thru 5.

(continue on reverse side if necessary)

STATE OF FLORIDA  
COUNTY OF Escambia

OATH

I, Ronald E. Ginsbach, the person bringing this complaint, being first duly sworn, do depose on oath and say that the facts set forth in the foregoing complaint and attachments thereto are true and correct to the best of my knowledge.

Ronald E. Ginsbach  
Signature of Complainant

Sworn to and subscribed before me  
this 4<sup>th</sup> day of April 19 86

[Signature]  
Notary Public

NOTE: The Division of Elections investigative authority is limited to violations of Chapter 106, Florida Statutes. Pursuant to Section 106.25, Florida Statutes, this complaint must remain confidential until a final disposition is made by the Florida Elections Commission.

NOTARY PUBLIC, STATE OF FLORIDA AT LARGE  
COMMISSION EXPIRES MAR. 15, 1988  
BONDED THROUGH MUROSKI-ASHTON INC.

Feb 11, 1986  
 RECEIVED  
 DEPARTMENT OF STATE  
 1986 MAR 18 AM 11:30  
 DIVISION OF ELECTIONS  
 TALLAHASSEE, FLORIDA

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Republican Precinct Committeeman, Precinct #99  
6901-A Esther St.  
Pensacola, Fl 32506  
Telephone 456-8820

2 enclosures

REG/jpn

2



**E**

MARSH M. ELMORE, 5/1-52-5557 11/51

W. BACH ROAD, PA. 154-5543

PACOLA, FL 32083

11-0-9

60422

*PAID*  
*One Hundred*

100-

*Della*

**UP**  
100 WEST  
FLORIDA BANK  
ONE HUNDRED  
THE WEST FLORIDA BANK  
PENSACOLA, FLORIDA

*Ben Elmore*

*Pa Dept of  
to Dept*

PAID TO ORDER

PAID TO ORDER

PAID TO ORDER

PAID TO ORDER

87040634600



## Supervisor of Elections Escambia County

**JOE OLDMIXON**  
SUPERVISOR OF ELECTIONS

March 20, 1986

Room 400, County Courthouse  
Post Office Box 12601  
Pensacola, Florida 32574-2601  
(904) 436-5796  
(SUNCOM) 237-5799

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Pensacola, Florida 32506

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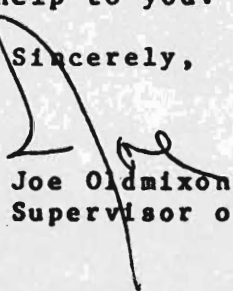
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Sincerely,

  
Joe Oldmixon  
Supervisor of Elections

JO/jk  
Enclosure

87040534601

4





FLORIDA DEPARTMENT OF STATE  
George Firestone  
Secretary of State

Dorothy W. Glisson  
Deputy Secretary For Elections

February 14, 1986

Republican Caucus  
Ronald E. Ginsbach, President  
Post Office Box 18582  
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Deputy Secretary for Elections

DWG/EB/ek

FLORIDA-State of the Arts

DIVISION OF ELECTIONS, Room 1801, The Capitol, Tallahassee, Florida 32301  
(904) 488-7690

5

87040534602





FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 2170

Date Filmed 2/2/77 Camera No. --- 2

Cameraman AS

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