



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

THIS IS THE BEGINNING OF MUR # 2837

DATE FILMED 2/7/91 CAMERA NO. 4

CAMERAMAN AS

GEMCD:WAK:CCD:SDP:slp

U.S. Department of Justice

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

88 DEC -1 PM 12:41

Washington, D.C. 20530

88 DEC -2 PM 5:26

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

Dear Mr. Chairman:

Re: Carl R. Channell, et al.; 2 U.S.C. §§ 441a and 441f

In 1987 this Department initiated a criminal investigation into an allegation of illegal political contributions, which were made through conduits by Washington, D.C. fund raiser Carl R. Channell. Through witness interviews, we were able to determine that at least \$3,000 was given by Mr. Channell to the 1986 re-election campaign of Senator Charles E. Grassley of Iowa (\$1,000 in Channell's own name and \$2,000 in the names of other individuals).

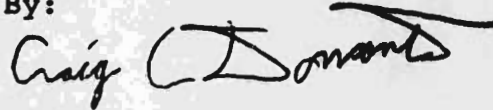
We have determined that this matter does not warrant criminal prosecution. We are referring this matter to the Commission for whatever action it considers appropriate under the administrative provisions of 2 U.S.C. § 437g(a). This matter is closed in the Department of Justice, and we do not plan to take further criminal investigative or enforcement action in it.

Please feel free to contact Stephanie Duncan-Peters at 786-5070 at your convenience to obtain additional information concerning this referral.

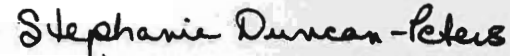
Sincerely,

Gerald E. McDowell
Chief, Public Integrity Section
Criminal Division

By:



Craig C. Donsanto
Director, Election Crimes Branch
Public Integrity Section
Criminal Division



Stephanie Duncan-Peters
Trial Attorney
Public Integrity Section
Criminal Division

cc: Dennis Aiken
Headquarters
Federal Bureau of Investigation

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 15, 1988

Craig C. Donsanto, Director
Election Crimes Branch
Public Integrity Section
Criminal Division
Department Of Justice
Washington, DC 20530

RE: PreMUR 206

Dear Mr. Donsanto:

This is to acknowledge receipt of your letter received on December 2, 1988, advising us of the possibility of a violation of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Carl Russell Channell and others. We are currently reviewing the matter and will advise you of the Commission's determination.

If you have any questions or additional information, please call George F. Rishel, the attorney assigned to this matter, at (202) 376-8200. Our file number for this matter is PreMUR 206.

Pursuant to 2 U.S.C. Section 437g(a)(4)(B) and Section 437g(a)(12)(A), the Commission's review of this matter shall remain confidential until the file has been closed.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

cc: Ms. Stephanie Duncan-Peters
Trial Attorney
Public Integrity Section
Criminal Division
Department Of Justice
Washington, DC 20530

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FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

EXECUTIVE SESSION

Pre-MUR 206

STAFF MEMBER: George F. Rishel
Sandra Robinson

SOURCE: INTERNALLY GENERATED

MAR 14 1989

RESPONDENTS:

National Endowment for the
Preservation of Liberty
Channell Corporation
Carl Russell Channell
Daniel Conrad
Francis D. Gomez
Esperanza N. Gomez
Cynthia Lane
Glenn David Lane
Joy M. Miller
Richard R. Miller
Eric Jon Olson
F. Clifton Smith

RELEVANT STATUTES:

2 U.S.C. § 441b(a)
2 U.S.C. § 441f
11 C.F.R. § 110.4(b)

INTERNAL REPORTS CHECKED:

Grassley Committee, Inc.
1985 Year End Report
American Conservative Trust
Financial Disclosure Reports

FEDERAL AGENCIES CHECKED:

Department of Justice
Federal Bureau of Investigation
American Conservative Trust
State Election Fund Financial
Disclosure Reports

I. GENERATION OF MATTER

In a letter received December 1, 1988, the Department of Justice Election Crimes Branch provided the Commission with information relating to the possible making of corporate contributions to the 1986 campaign of Senator Charles Grassley. Such corporate contributions were allegedly made in the names of certain individuals involved with business relations with Carl

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Russell Channell. The circumstances described in the referral information indicated that corporate funds were used in an alleged reimbursement scheme connected with these contributions. This information was supplemented with documents provided by a special agent of the FBI on December 7, 1988. This material was previously circulated to the Commission on December 14, 1988.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") prohibits any corporation from making a contribution or expenditure in connection with any federal election. The Act further prohibits any officer or any director of any corporation from consenting to such contribution or expenditure by the corporation. A candidate and political committee are prohibited from accepting or receiving any corporate contribution. 2 U.S.C. § 441b(a).

The Act further provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. See also, 11 C.F.R. § 110.4(b). The Act defines the term "person" to include a corporation. 2 U.S.C. § 431(11). This prohibition includes a corporation's payment, reimbursement, or other compensation to any person for his or her contribution to any federal candidate or political committee. See Advisory Opinion 1986-41. The Commission has also determined that persons or entities that assist in the making of a contribution in the name of another may

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be found in violation of Section 441f.

Senator Charles Grassley was a candidate for re-election to the U.S. Senate from the State of Iowa in 1986. His principal campaign committee for that election was the Grassley Committee, Inc. Thus, an individual could not reimburse or otherwise compensate another person for his or her contribution to Senator Grassley with respect to any federal election. Also, a person could not make a contribution to Senator Grassley in his or her own name with funds provided to him or her for that purpose by another person. Moreover, Senator Grassley and his authorized political committee could not knowingly accept contributions made by one person in the name of another. In addition, corporate funds could not be used directly or indirectly to make a contribution or expenditure in connection with Senator Grassley's re-election campaign. Thus, an officer or director of any corporation could not consent to any contribution or expenditure to Senator Grassley or his political committee in the name of such corporation or in the name of another person. Further, neither Senator Grassley or his political committee could accept such prohibited contribution.

According to the information provided by DOJ and the FBI, in early December 1985, Carl Russell Channell organized a fundraising breakfast on behalf of the 1986 re-election campaign of Senator Grassley. Channell allegedly solicited \$1,000 contributions from several associates and acquaintances with respect to this fundraiser. The breakfast was held on or about December 12 or 13, apparently on Capitol Hill in the Senate

dining room. Those present at the breakfast included Senator Grassley, his aide, Tom Synhorst, Carl Russell Channell, and Channell's associates, Glenn David Lane, Daniel Conrad, and Richard Miller. Apparently, no contributions were delivered to Senator Grassley at this breakfast.

Subsequent to the breakfast, however, 10 contributions of \$1,000 each were made and delivered to the Grassley Committee. These contributions, each for \$1,000, were from: Carl Russell Channell, Daniel Conrad, Francis Gomez, Esperanza Gomez, Glenn David Lane, Cynthia Lane, Richard Miller, Joy Miller, Eric Jon Olson, and F. Clifton Smith. The Grassley Committee reported that it received all of these contributions on December 24, 1985. All of them are reported as made with respect to the 1986 primary election. See Attachment 1.

At the time the contributions at issue were made to the Grassley Committee, the active Channell organizations included the Channell Corporation and the National Endowment for the Preservation of Liberty ("NEPL"), both incorporated in the District of Columbia; the American Conservative Trust ("ACT"), a political action committee registered with the Commission; and the American Conservative Trust State Election Fund ("ACT-SEF"), a non-federal political action committee.

Daniel Conrad and F. Clifton Smith were employees of NEPL and ACT, at the time of their contributions. Glenn David Lane was an outside fundraising consultant who worked for one of Channell's organizations in December 1985 and January 1986. Francis Gomez and Richard Miller were partners in International Business

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Communications, a firm engaged in various endeavors with NEPL and ACT during this period. Eric Jon Olson was a personal acquaintance of Channell's. Tom Synhorst was a campaign aide to Senator Grassley, who reportedly arranged and coordinated the breakfast with Channell.

Glenn David Lane stated in interviews with the FBI special agent that he told Channell that he was financially unable to contribute to the Grassley campaign at that time. He stated further that Channell told him that he (Lane) would be reimbursed. A reimbursement of \$2,000 for Glenn David Lane's and Cynthia Lane's contributions was made. Channell described these payments as a "business expense reimbursement." The reimbursement was reportedly included in a check which paid Lane for his consulting services, apparently drawn on the account of one of the corporations operational at that time.¹ Mr. Lane provided the FBI with copies of his contribution checks and his bank statement for December 1985.

Eric Jon Olson told the FBI agent that he made a contribution

1. A review of the financial disclosure reports of ACT and ACT-SEF revealed that neither committee made a substantial disbursement to any of the individuals who made one of the contributions at issue in this matter. The reports reviewed included those filed immediately following or within six months of December 24, 1985, the date on which the Grassley Committee reported the contributions as received. It is noted that F. Clifton Smith was employed as a fundraiser with the Channell organizations at the time in question, and that he was the treasurer of both of these political committees. In November 1986 Mr. Smith received a total of \$11,028.58 in salary, bonus and commission from ACT-SEF. There is no present indication, however, that these funds were connected with Mr. Smith's contribution to the Grassley Committee in December 1985. Therefore, this Office makes no recommendations at this time with respect to the two political committees.

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to Senator Grassley as part of this fundraising event, but he stated that he received no compensation or reimbursement for his contribution. When Senator Grassley returned Carl Russell Channell's contribution in April or May 1987 (when adverse publicity surrounding Channell was circulating), Mr. Olson contacted Senator Grassley's office and demanded a refund of his contribution as well, which was done.

We note that Mr. Olson's statements to the FBI agent, as well as Mr. Lane's, were not made under oath. In addition, the FBI special agent verbally informed this Office that counsel for some of the contributors would not permit their clients to be interviewed.

The information provided to the Commission shows that there is reason to believe NEPL, the Channell Corporation, and Carl Russell Channell, as an officer or director of these corporations, violated 2 U.S.C. § 441b(a) with respect to the reimbursement of the \$2,000 in contributions from Cynthia and Glenn David Lane to the Grassley Committee. It also appears that there is reason to believe NEPL, the Channell Corporation, and Carl Russell Channell violated 2 U.S.C. § 441f with respect to these same contributions. The information also shows that there is reason to believe Glenn David Lane and Cynthia Lane violated 2 U.S.C. § 441f. Accordingly, this Office recommends that the Commission find reason to believe these Respondents have violated the above-noted sections of the Act.

The referral information also suggests that some or all of the other contributors may have been reimbursed by one of the

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Channell corporations for their contributions. Nevertheless, the information does not, at this time, show that there is reason to believe the other contributors have violated the Act, especially in light of the statement by Mr. Olson. Therefore, this Office makes no recommendation regarding these other contributors at this time, pending further investigation.

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This Office also recommends that the Commission approve the proposed subpoena and order to Channell and the proposed interrogatories and requests for documents to the Lanes, in order to begin the investigation in this matter. Because Glenn David Lane voluntarily cooperated with the FBI investigation, we are not recommending at this time the use of a subpoena for the Lanes. The Commission's investigation in MUR 2406 regarding Channell and his organizations has, however, revealed that Channell may no longer have possession of many of his records or those of his organizations. Thus, Channell may not be able to provide all of the information requested in the subpoena and order.

This Office is also informed that NEPL maintained its bank accounts with The Palmer National Bank. In our view, the bank records for NEPL and the Channell Corporation, for the period before and after these events, are material evidence to ascertain whether reimbursements were made to the contributors to Senator Grassley solicited by Channell. Therefore, in order to insure that the investigation in this matter proceeds without undue delay, this Office also recommends that the Commission issue a subpoena and order to The Palmer National Bank, as a

nonrespondent witness, for the subject bank records.² We further recommend that interrogatories and requests for documents be posed to Tom Synhorst, an aide to Senator Grassley who coordinated the fundraising breakfast with Channell and also attended the event, as a nonrespondent witness.

As the Commission is aware, Channell and his organizations are respondents in MUR 2406, which involves questions of whether he and his organizations became political committees under the Act or violated the Act's prohibitions on corporate contributions. Some of the individuals who are potential respondents in this matter have been treated as nonrespondent witnesses in MUR 2406. Furthermore, this matter involves a specific fundraising event for which there is no information at the present time linking it to the issues in MUR 2406. Therefore, this Office is not recommending merger of these matters at this time.

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the National Endowment for the Preservation of Liberty, the Channell Corporation and Carl Russell Channell, as an officer or director of these corporations, violated 2 U.S.C. § 441b(a).
3. Find reason to believe the National Endowment for the Preservation of Liberty, the Channell Corporation, and Carl Russell Channell violated 2 U.S.C. § 441f.

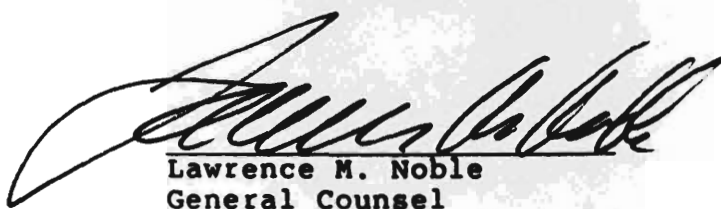
2. It is noted that the Right to Financial Privacy Act is not applicable in this circumstance. The Right to Financial Privacy Act protects the rights of individuals and partnerships of five or fewer individuals. In this instance, we are seeking the financial records of corporations. A corporation is not included in the definition of "customer" or "person" for purposes of the Right to Financial Privacy Act. See 12 U.S.C. § 3401; U.S. v. Theron, 116 F.R.D. 58 (D. Kan. 1987); Spa Flying Service, Inc. v. U.S., 724 F.2d 95 (C.A. Ark. 1984).

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4. Find reason to believe Glenn David Lane violated 2 U.S.C. § 441f.
5. Find reason to believe Cynthia Lane violated 2 U.S.C. § 441f.
6. Approve the attached letter, Factual and Legal Analysis, and Subpoena and Order to Carl Russell Channell, NEPL, and the Channell Corporation.
7. Approve the attached letters, Factual and Legal Analyses, and interrogatories and requests for documents to Glenn David Lane and Cynthia Lane.
8. Approve the attached letter, and subpoena and order to The Palmer National Bank, as a nonrespondent witness.
9. Approve the attached letter and interrogatories and requests for documents to Tom Synhorst, as a nonrespondent witness.

Date

3/1/89


Lawrence M. Noble
General Counsel

Attachments:

1. Excerpts from the Grassley Committee Reports
2. Proposed Letter, Factual and Legal Analysis, and Subpoena and Order to NEPL, Channell Corporation, and Carl Russell Channell
3. Proposed Letters, Factual and Legal Analyses, and interrogatories and requests for documents (2) to the Lanes
4. Proposed letter, and Subpoena and Order to The Palmer National Bank, as a nonrespondent witness
5. Proposed letter and interrogatories and request for documents to Tom Synhorst, as a nonrespondent witness

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REPORT OF RECEIPTS AND DISBURSEMENTS For an Authorized Committee

(Summary Page)

1. Name of Committee (in Full) Grassley Committee, Inc.	2. FEC Identification Number C00108223
Address (Number and Street) 2190 - 82nd Street	3. Is this Report an Amendment? ☐ YES ☒ NO
City, State and ZIP Code ☐ Check if address is different than previously reported. Iowa Moines, Iowa 50322	

TYPE OF REPORT

- ☐ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☒ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)

☐ Twelfth day report preceding _____ (Type of Election)
 election on _____ in the State of _____
☐ Thirtieth day report following the General Election
 on _____ in the State of _____
☐ Termination Report

This report contains activity for — ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	July 1, 1985 Through December 31, 1985		
6. Net Contributions (other than loans):			
(a) Total Contributions (other than loans) (from Line 11c)		\$ 423,289.62	\$ 970,588.22
(b) Total Contribution Refunds (from Line 20d)		\$	\$ 10,412.50
(c) Net Contributions (other than loans) (Subtract Line 6b from 6a)		\$ 423,289.62	\$ 960,175.72
7. Net Operating Expenditures:			
(a) Total Operating Expenditures (from Line 17)		\$ 140,940.62	\$ 257,605.79
(b) Total Offsets to Operating Expenditures (from Line 14)		\$ 322.82	\$ 3,104.94
(c) Net Operating Expenditures (Subtract Line 7b from 7a)		\$ 140,617.80	\$ 254,500.85
8. Cash on Hand at Close of Reporting Period (from Line 27)		\$ 1,015,677.13	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
12. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

For further information, contact:

Federal Election Commission
Toll Free 800-424-9630
Local 202-623-4088

John L. Hanes, Treasurer
Type or Print Name of Treasurer

[Signature]
Signature of Treasurer

1-21-86
Date

NOTE: Submission of false, overstated, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

			Attachment I(1)
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FEC FORM 3 (3/80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FFC FORM 3)**

Name of Committee (in Full)		Report Covering the Period		
Cassidy Committee, Inc.		From 7-1-85	To 12-31-85	
		COLUMN A Total This Period	COLUMN B Calendar Year to Date	
I. RECEIPTS				
11	CONTRIBUTIONS (other than loans) FROM			
	(a) Individuals/Persons Other Than Political Committees	261,595.39	555,845.30	11 (a)
	Memo Entry Unitemized \$ 152,999.42			
	(b) Political Party Committees	1,233.33	1,233.33	11 (b)
	(c) Other Political Committees	160,460.90	413,509.59	11 (c)
	(d) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d))	423,289.62	970,588.22	11 (d)
12	TRANSFERS FROM OTHER AUTHORIZED COMMITTEES	13,235.72	28,235.72	12
13	LOANS			
	(a) Made or Guaranteed by the Candidate			13 (a)
	(b) All Other Loans			13 (b)
	(c) TOTAL LOANS (add 13 (a) and 13 (b))			13 (c)
14	OFFSETS TO OPERATING EXPENDITURES (Refunds, Retains, etc.)	322.82	3,104.94	14
15	OTHER RECEIPTS (Dividends, Interest, etc.)	26,629.45	37,690.11	15
16	TOTAL RECEIPTS (add 11 (a), 12, 13 (c), 14 and 15)	463,477.61	1,039,618.99	16
II. DISBURSEMENTS				
17	OPERATING EXPENDITURES	140,940.62	257,605.79	17
18	TRANSFERS TO OTHER AUTHORIZED COMMITTEES			18
19	LOAN REPAYMENTS			
	(a) Of Loans Made or Guaranteed by the Candidate			19 (a)
	(b) Of All Other Loans			19 (b)
	(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b))			19 (c)
20	REFUNDS OF CONTRIBUTIONS TO:		3,250.00	
	(a) Individuals/Persons Other Than Political Committees			20 (a)
	(b) Political Party Committees			20 (b)
	(c) Other Political Committees		7,162.50	20 (c)
	(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))		10,412.50	20 (d)
21	OTHER DISBURSEMENTS	7,024.65	7,024.65	21
22	TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)	147,965.27	275,042.94	22
III. CASH SUMMARY				
23	CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 700,164.79		23
24	TOTAL RECEIPTS THIS PERIOD (From Line 16)	\$ 463,477.61		24
25	SUBTOTAL (Add Line 23 and Line 24)	\$ 1,163,642.40		25
26	TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	\$ 147,965.27		26
27	CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from Line 25)	\$ 1,015,677.13		27

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SCHEDULE A

ITEMIZED RECEIPTS

Page 6 of 35 to
Last Number 17
Use separate schedules for each
category of the Detailed
Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee			
Name of Committee (in Full) Grassley Committee, Inc.			
A. Full Name, Mailing Address and ZIP Code Butler, Alice I. & John E. 2000 S. Grandview Ave. Dubuque, Iowa 52001 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation Homemaker	9-16-85	\$350.00
	Aggregate Year-to-Date-\$ 350.00		
B. Full Name, Mailing Address and ZIP Code Cain, Dilys R. & Paul W. 3106 Amberwood Amarillo, Texas 79106 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	12-10-85	\$1,000.00
	Aggregate Year-to-Date-\$ 1,000.00		
C. Full Name, Mailing Address and ZIP Code Cain, Paul W. & Dilys R. 3106 Amberwood Amarillo, Texas 79106 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	12-10-85	\$1,000.00
	Aggregate Year-to-Date-\$ 1,000.00		
D. Full Name, Mailing Address and ZIP Code Channell, Carl R. 2032 Belmont Rd., N.W., No 210 Washington, D.C. 20009 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	12-24-85	\$1,000.00
	Aggregate Year-to-Date-\$ 1,000.00		
E. Full Name, Mailing Address and ZIP Code Christensen, Ross 847 W. Fourth Street Waterloo, Iowa 50701 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation Orthodontist	9-10-85	\$750.00
	Aggregate Year-to-Date-\$ 750.00		
F. Full Name, Mailing Address and ZIP Code Cohn, Norman 200 Pine Tree Rd. Radnor, Pa 19087 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Nat'l Bus Service	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation Chairman	12-18-85	\$1,000.00
	Aggregate Year-to-Date-\$ 1,000.00		
G. Full Name, Mailing Address and ZIP Code Collins, Mrs. Thomas M. 528 Vernon Dr., S.E. Cedar Rapids, Iowa 52403 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation Homemaker	9-10-85	\$333.67
	Aggregate Year-to-Date-\$ 333.67		
SUBTOTAL of Receipts This Page (optional).....			\$5,433.67
TOTAL This Period (Sum page 60000 number only)			

I(3)

SCHEDULE A

ITEMIZED RECEIPTS

Page 5 of 39 for
LOUIS HANSEN
 (No separate schedule for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
Grassley Committee, Inc.

A. Full Name, Mailing Address and ZIP Code Comess, Sam J. 1350 Kimberly Ridge Rd. Bettendorf, Iowa 52772 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Le Claire Quarries Occupation President Aggregate Year-to-Date-\$ 250.00	Date (month, day, year) 8-8-85	Amount of Each Receipt This Period \$250.00
B. Full Name, Mailing Address and ZIP Code Conrad, Daniel Lynn 105-4th Street, N.E. Washington, D.C. 20002 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Occupation Aggregate Year-to-Date-\$ 1,000.00	Date (month, day, year) 12-24-85	Amount of Each Receipt This Period \$1,000.00
C. Full Name, Mailing Address and ZIP Code Contard, Chris 279 Indiandale Rd., S.E. Cedar Rapids, Iowa 52403 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Is. Elec. Light & Power Company Occupation Manager Aggregate Year-to-Date-\$ 500.00	Date (month, day, year) 9-9-85	Amount of Each Receipt This Period \$500.00
D. Full Name, Mailing Address and ZIP Code Cronin, Denis F. 64 Elderfields Rd. Manhasset, New York 11030 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Manuf. Hanover Trust Compan. Occupation Aggregate Year-to-Date-\$ 250.00	Date (month, day, year) 7-24-85	Amount of Each Receipt This Period \$250.00
E. Full Name, Mailing Address and ZIP Code Daniel, Robert O. 500 MNB Bldg. Cedar Rapids, Iowa 52401 Receipt For ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Shuttleworth and Ingersoll Occupation Lawyer Aggregate Year-to-Date-\$ 333.33	Date (month, day, year) 12-10-85	Amount of Each Receipt This Period \$333.33
F. Full Name, Mailing Address and ZIP Code Daniels, June & Ronald L. 159-37th Street Des Moines, Iowa 50312 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Cleaning Machine Inc. Occupation Aggregate Year-to-Date-\$ 666.67	Date (month, day, year) 9-25-85 12-30-85	Amount of Each Receipt This Period \$333.33 333.34
G. Full Name, Mailing Address and ZIP Code Daniels, Selma S. 3660 Grand Des Moines, Iowa 50312 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer Daniels Investment Occupation Real Estate Developer Aggregate Year-to-Date-\$ 666.66	Date (month, day, year) 3-8-85	Amount of Each Receipt This Period \$666.66
SUBTOTAL of Receipts This Page (optional)			\$3,666.66
TOTAL This Period (last page only)			

I(4)

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 15 for
 1985
 This schedule should be attached to each
 copy of the Detailed
 Summary Page

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

Name of Committee (in Full) Grassley Committee, Inc.			
A. Full Name, Mailing Address and ZIP Code Goldsmith, Patty & John Rt. 1, Box 65 Segeant Bluff, Iowa 51054	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$300.00
	Occupation	9-23-85	
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 300.00		
B. Full Name, Mailing Address and ZIP Code Goldstein, Mrs. Leonard 11217 Woolworth Plaza Omaha, Nebraska 68144	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$300.00
	Occupation	12-10-85	
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 300.00		
C. Full Name, Mailing Address and ZIP Code Gomez, Esperanza N. & Francis D. 6564 Williamsburg Blvd. Arlington, VA 22213	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$1,000.00
	Occupation	12-24-85	
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 1,000.00		
D. Full Name, Mailing Address and ZIP Code Gomez, Francis D. & Esperanza N. 6564 Williamsburg Blvd. Arlington, VA 22213	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$1,000.00
	Occupation	12-24-85	
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 1,000.00		
E. Full Name, Mailing Address and ZIP Code Graham, Seymour C. 686 Dietrich Hazleton, PA 18201	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$250.00
	Occupation	12-10-85	
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 250.00		
F. Full Name, Mailing Address and ZIP Code Grant, Eugene M. 200 Park Ave. New York, New York	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period \$500.00
	Occupation	12-24-85	
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 500.00		
G. Full Name, Mailing Address and ZIP Code Griffith, Frank W. 4019 Hiawatha West Sioux City, Iowa 51104	Name of Employer Utility Co.	Date (month, day, year)	Amount of Each Receipt This Period \$350.00
	Occupation Executive	9-13-85	
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date—\$ 350.00		
SUBTOTAL of Receipts This Page (optional)			\$3,700.00
TOTAL This Period (Sum page 15a line number only)			

I(5)

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1
 Line 1 of 1
 This schedule is required for each category of the General Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee			
Name of Committee (in full) Grassley Committee, Inc.			
A. Full Name, Mailing Address and ZIP Code Lande, Roger L. 100 First National Bank Bldg. Muscatine, Iowa 52761	Name of Employer Stanley, Land, Coulter & Pearce	Date (month, day, year) 9-16-85	Amount of Each Receipt This Period \$1,000.00
	Occupation Attorney		
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-\$1,000.00		
B. Full Name, Mailing Address and ZIP Code Lane, Cynthia 1002 N. Sycamore Falls Church, VA 22046	Name of Employer	Date (month, day, year) 12-24-85	Amount of Each Receipt This Period \$1,000.00
	Occupation		
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-\$1,000.00		
C. Full Name, Mailing Address and ZIP Code Lane, G. David & Cynthia 1002 N. Sycamore Falls Church, VA 22046	Name of Employer	Date (month, day, year) 12-24-85	Amount of Each Receipt This Period \$1,000.00
	Occupation		
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-\$1,000.00		
D. Full Name, Mailing Address and ZIP Code Lang, Irene 139-37th Street Des Moines, Iowa 50312	Name of Employer Maxi Deli	Date (month, day, year) 10-10-85	Amount of Each Receipt This Period \$333.33
	Occupation Manager		
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-\$333.33		
E. Full Name, Mailing Address and ZIP Code Larson, David J. 6055 Manchester Drive Minneapolis, Minn. 55422	Name of Employer	Date (month, day, year) 10-10-85	Amount of Each Receipt This Period \$450.00
	Occupation		
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-\$450.00		
F. Full Name, Mailing Address and ZIP Code Larson, Ira E. 358 Garden Dr. S.E. Cedar Rapids, Iowa 52403	Name of Employer	Date (month, day, year) 9-10-85	Amount of Each Receipt This Period \$250.00
	Occupation		
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-\$250.00		
G. Full Name, Mailing Address and ZIP Code Lederman, Lawrence 138 Anderson Ave. Demarest, New Jersey	Name of Employer Manuf. Manover Trust Co.	Date (month, day, year) 7-24-85	Amount of Each Receipt This Period \$250.00
	Occupation		
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Aggregate Year-to-Date-\$250.00		
SUBTOTAL of Receipts This Page (printed)			\$4,283.33
TOTAL This Period (See page 10 for number only)			

I(6)

SCHEDULE A

ITEMIZED RECEIPTS

Page 21 of 25 for
LINE NUMBER 11A
 Has address scheduled for each
 category of the Detailed
 Summary Page?

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

Name of Committee (in Full)
Grassley Committee, Inc.

A. Full Name, Mailing Address and ZIP Code McEnroe, Allan L. 1204 Oak Park Blvd. Cedar Falls, Iowa 50611	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Control-O-Fax Corp.	10-1-85	\$334.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Executive		
	Aggregate Year-to-Date—\$ 334.00		
B. Full Name, Mailing Address and ZIP Code McGinnis, Paul J., II & Kay R. 219-37th Street Des Moines, Iowa 50312	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Peat, Marwick, Mitchell Co.	7-30-85	\$500.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—\$ 500.00		
C. Full Name, Mailing Address and ZIP Code Mennen, Gordon L. 701 Central Ave. Le Mars, Iowa 51031	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Lemars Savings Bank	9-13-85	\$300.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	President		
	Aggregate Year-to-Date—\$ 350.00		
D. Full Name, Mailing Address and ZIP Code Miller, Gregg D. P.O. Box 841 Marshalltown, Iowa 50156	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Racom Corp.	10-21-85	\$250.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Executive		
	Aggregate Year-to-Date—\$ 500.00		
E. Full Name, Mailing Address and ZIP Code Miller, Joy M. & Richard R. 4500 Orangewood Lane Bowie, MD 20715	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		12-24-85	\$1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—\$ 1,000.00		
F. Full Name, Mailing Address and ZIP Code Miller, Richard R. & Joy M. 4500 Orangewood Lane Bowie, MD 20715	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		12-24-85	\$1,000.00
Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—\$ 1,000.00		
G. Full Name, Mailing Address and ZIP Code 	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For: ☐ Primary ☐ General ☐ Other (specify):	Occupation		
	Aggregate Year-to-Date—		
SUBTOTAL of Receipts This Page (optional)			\$3,384.00
TOTAL This Period (last page this line number only)			

I(7)

SCHEDULE A

ITEMIZED RECEIPTS

Page 22 of 25 to
Line 11000000
Also prepare schedule for each
category of the Detailed
Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full) Grassley Committee, Inc.			
A. Full Name, Mailing Address and ZIP Code Millstein, Ira M. 1240 Flagler Drive Mamaroneck, New York 10543	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	7-24-85	\$1,000.00
Receipt For: ☒ Primary ☐ General Other (specify):	Aggregate Year-to-Date-\$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code Moeller, Michael 4709 Meadow Lane Sioux City, Iowa 51104	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	10-23-85	\$1,000.00
Receipt For: ☒ Primary ☐ General Other (specify):	Aggregate Year-to-Date-\$ 1,000.00		
C. Full Name, Mailing Address and ZIP Code Nemmers, James C. & Patricia A. 2048 Sunland Drive S.E. Cedar Rapids, Iowa 52403	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	12-31-85	\$333.00
Receipt For: ☒ Primary ☐ General Other (specify):	Aggregate Year-to-Date-\$ 666.00		
D. Full Name, Mailing Address and ZIP Code Norris, John W. 411 Jerome St. Marshalltown, Iowa 50158	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	9-9-85 11-15-85	\$100.00 100.00
Receipt For: ☒ Primary ☐ General Other (specify):	Aggregate Year-to-Date-\$ 300.00		
E. Full Name, Mailing Address and ZIP Code Olson, Eric Jon 2032 Belmont Rd., N.W., Mo. 210 Washington, D.C. 20009	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	12-24-85	\$1,000.00
Receipt For: ☒ Primary ☐ General Other (specify):	Aggregate Year-to-Date-\$ 1,000.00		
F. Full Name, Mailing Address and ZIP Code Olson, R.E. 700 Liberty Building Des Moines, Iowa 50309	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	11-21-85	\$250.00
Receipt For: ☒ Primary ☐ General Other (specify):	Aggregate Year-to-Date-\$ 500.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation		
Receipt For: ☐ Primary ☐ General Other (specify):	Aggregate Year-to-Date-\$		
SUBTOTAL of Receipts This Page (Include all)			\$3,783.00
TOTAL This Period (See page 25 for further info)			

I(8)

SCHEDULE A

ITEMIZED RECEIPTS

Page 28 of 35 to
 Line 1111111111
 Use separate schedule for each
 category of the Qualified
 Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee			
Name of Committee (in Full) Grassley Committee, Inc.			
A. Full Name, Mailing Address and ZIP Code Simpson, Frederick H. 802 Brook Ridge Circle Atlantic, Iowa 50022 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Self-Employed	8-9-85	\$250.00
	Occupation Pub.-Atlantic News Aggregate Year-to-Date-\$ 530.00	8-27-85	30.00
B. Full Name, Mailing Address and ZIP Code Smith, F. Clifton 4649 Conn. Ave., Apt. 721 Washington, D.C. 20008 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		12-24-85	\$1,000.00
	Occupation Aggregate Year-to-Date-\$ 1,000.00		
C. Full Name, Mailing Address and ZIP Code Smith, herald A. 536 Valley Brook Drive, S.E. Cedar Rapids, Iowa 52403 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Crst, Ins.	12-5-85	\$875.00
	Occupation Chairman Aggregate Year-to-Date-\$ 875.00		
D. Full Name, Mailing Address and ZIP Code Smith, Miriam & Herald 536 Valleybrook Drive, S.E. Cedar Rapids, Iowa 52403 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	CRST, Inc.	12-5-85	\$125.00
	Occupation Sec.-Treas. Aggregate Year-to-Date-\$ 325.00	11-26-85	200.00
E. Full Name, Mailing Address and ZIP Code Spanier, F.L. & Patricia 2742 Lakeview Ave. Roseville, MN 55113 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
		10-10-85	\$300.00
	Occupation Aggregate Year-to-Date-\$ 300.00		
F. Full Name, Mailing Address and ZIP Code Stanley, David M. & Jean P.O. Box 619 Muscatine, Iowa 52761 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Self-Employed	10-17-85	\$750.00
	Occupation Lawyer Aggregate Year-to-Date-\$ 750.00		
G. Full Name, Mailing Address and ZIP Code Stanley, Elizabeth M. 115 Sunset Drive Muscatine, Iowa 52761 Receipt For: ☒ Primary ☐ General ☐ Other (specify):	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Muscatine Art Center	12-17-85	\$500.00
	Occupation Honorary Trustee Aggregate Year-to-Date-\$ 500.00		
SUBTOTAL of Receipts This Page (Expenditures)			\$4,030.00
TOTAL This Period (Last page only)			

I(9)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN
COMMISSION SECRETARY

DATE: MARCH 3, 1989

SUBJECT: OBJECTION TO PreMUR 206: FIRST G.C. REPORT
SIGNED MARCH 1, 1989

The above-captioned document was circulated to the
Commission on THURSDAY, MARCH 2, 1989 at 11:00 a.m..

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____ X _____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the meeting agenda
for March 14, 1989.

Please notify us who will represent your Division before the
Commission on this matter.

21040322032

21040322033

National Endowment for the
Preservation of Liberty
Channell Corporation
Carl Russell Channell
Daniel Conrad
Francis D. Gomez
Esperanza N. Gomez
Cynthia Lane
Glenn David Lane
Joy M. Miller
Richard R. Miller
Eric Jon Olson
F. Clifton Smith

(muB
2837)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of March 14, 1989, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to Pre-MUR 206:

1. Open a Matter Under Review (MUR).
2. Find reason to believe the National Endowment for the Preservation of Liberty, the Channell Corporation and Carl Russell Channell, as an officer or director of these corporations, violated 2 U.S.C. § 441b(a).

(continued)

Federal Election Commission
Certification for Pre-MUR 206
March 14, 1989

Page 2

3. Find reason to believe the National Endowment for the Preservation of Liberty, the Channell Corporation, and Carl Russell Channell violated 2 U.S.C. § 441f.
4. Find reason to believe Glenn David Lane violated 2 U.S.C. § 441f.
5. Find reason to believe Cynthia Lane violated 2 U.S.C. § 441f.
6. Approve the letter, Factual and Legal Analysis, and Subpoena and Order to Carl Russell Channell, NEPL, and the Channell Corporation, as recommended in the General Counsel's report dated March 1, 1989.
7. Approve the letters, Factual and Legal Analyses, and interrogatories and requests for documents to Glenn David Lane and Cynthia Lane as recommended in the General Counsel's report dated March 1, 1989.
8. Approve the letter, and subpoena and order to The Palmer National Bank, as a nonrespondent witness, as recommended in the General Counsel's report dated March 1, 1989.
9. Approve the letter and interrogatories and requests for documents to Tom Synhorst, as a nonrespondent witness, as recommended in the General Counsel's report dated March 1, 1989.

Commissioners Aikens, Elliott, Josefiak, McDonald,
McGarry, and Thomas voted affirmatively for the decision.

Attest:

3-15-89

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

91040322034



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 22, 1989

Cynthia Lane
1002 N. Sycamore St.
Falls Church, VA 22046

RE: MUR 2837
Cynthia Lane

Dear Mrs. Lane:

On March 14, 1989, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the 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 the 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, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

21040322035

Cynthia Lane
Page 2

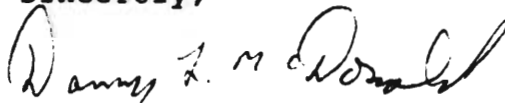
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 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 Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

91040323036

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Cynthia Lane

MUR: 2837

91040322037
The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. See also, 11 C.F.R. § 110.4(b). Thus, an individual could not reimburse or otherwise compensate another person for his or her contribution to Senator Grassley with respect to any federal election. Also, a person could not make a contribution to Senator Grassley in his or her own name with funds provided to him or her for that purpose by another person.

According to information ascertained in the normal course of carrying out the Commission's supervisory responsibilities, in early December 1985 Carl Russell Channell organized a fundraising breakfast on behalf of the 1986 re-election campaign of Senator Charles Grassley. Channell apparently solicited \$1,000 contributions from several associates and acquaintances with respect to this fundraiser. The breakfast was held on or about December 12 or 13, apparently on Capitol Hill in the Senate dining room. Those present at the breakfast included Senator Grassley, his aide Tom Synhorst, Carl Russell Channell, and his associates Glenn David Lane, Daniel Conrad, and Richard Miller. No contributions were apparently delivered to Senator Grassley at

this breakfast.

Nevertheless, subsequent to the breakfast, 10 contributions of \$1,000 each were made and delivered to the Grassley Committee. These contributions, each for \$1,000, were from: Carl Russell Channell, Daniel Conrad, Francis Gomez, Esperanza Gomez, Glenn David Lane, Cynthia Lane, Richard Miller, Joy Miller, Eric Jon Olson, and F. Clifton Smith. The Grassley Committee reported the receipt of all of these contributions on December 24, 1985. All of them are reported as made with respect to the 1986 primary election.

Glenn David Lane has stated he told Channell that he was financially unable to contribute to the Grassley campaign at that time and that Channell told him he (Lane) would be reimbursed. A reimbursement of \$2,000 for Glenn David Lane's and Cynthia Lane's contributions was made. Channell described these payments as a "business expense reimbursement." The reimbursement was reportedly included in a check which paid Lane for his consulting services.

Therefore, there is reason to believe Cynthia Lane has violated 2 U.S.C. § 441f.

2104032303

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2837
)

**INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS**

TO: Cynthia Lane
1002 N. Sycamore Street
Falls Church, VA 22046

21040322039

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from November 1, 1985 to January 31, 1986.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

91040322040

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

**INTERROGATORIES
AND REQUEST FOR DOCUMENTS**

1. State whether you made a contribution to Senator Charles Grassley's 1986 re-election campaign. If so, state the date and amount of your contribution and the date and person(s) to whom you gave the contribution. Provide a copy of the front and back of your contribution check.
2. State whether you attended a fundraising event on behalf of Senator Grassley's 1986 re-election campaign. If so, state the date and place of the event, who invited or requested that you attend the event, and describe in detail what was discussed at this event.
3. State whether Carl Russell Channell solicited or requested a contribution from you to Senator Grassley's 1986 re-election campaign. If so, describe in detail what you were told and the date and place you were solicited or the request was made.
4. State whether you informed Carl Russell Channell, in any manner, that you were financially unable to make the contribution described in your response to question 3. If so, describe in detail what you told Mr. Channell and the date and place you provided him with this information.
5. State whether Carl Russell Channell indicated to you in any manner that you would be reimbursed or compensated for your contribution described in your response to Question 3. If so, describe in detail what Mr. Channell told you and the date and place he made this information known to you.
6. State whether you were reimbursed or compensated for your contribution to Senator Grassley's 1986 re-election campaign. If so, identify who reimbursed or compensated you, the date and place you received such reimbursement or compensation, the manner in which such reimbursement or compensation was made to you, and the amount of such reimbursement or compensation, and, if reimbursement or compensation was made by check, the person or organization whose account was used to make such payment and the banking institution and account number from which such payment was made.
7. State whether you were employed by Carl Russell Channell or any organization controlled by him for the period including November 1, 1985, through January 31, 1986. If so, describe in detail the length and nature of your employment and the services you performed.

91040322042



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

March 22, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Carl R. Channell
2032 Belmont Road, N.W., #210
Washington, D.C. 20009

RE: MUR 2837
Carl R. Channell, National
Endowment for the
Preservation of Liberty and
Channell Corporation

Dear Mr. Channell:

On March 14, 1989, the Federal Election Commission found that there is reason to believe the National Endowment for the Preservation of Liberty ("NEPL"), Channell Corporation and you, as an officer or director of these named corporations, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On that same date, the Commission found reason to believe NEPL, Channell Corporation, and you violated 2 U.S.C. § 441f. The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against NEPL, Channell Corporation and you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Statements should be submitted under oath. All responses to the enclosed Subpoena to Produce Documents and Order to Submit Written Answers must be submitted within 15 days of your receipt of this subpoena and order. Any additional materials or statements you wish to submit should accompany the response to the subpoena and order.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. If you intend to be represented by counsel, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications or other communications from the Commission.

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Carl R. Channell
Page 2

In the absence of any additional information which demonstrates that no further action should be taken against NEPL, Channell Corporation and you, the Commission may find probable cause to believe that violations have occurred and proceed with conciliation.

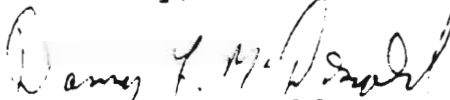
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending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

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 the General Counsel ordinarily will not 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 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 Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Subpoena and Order
Procedures
Designation of Counsel Form

91040322044

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: Carl Russell Channell
National Endowment for the
Preservation of Liberty
Channell Corporation

MUR 2837

21040322045

The Federal Election Campaign Act of 1971, as amended ("the Act") prohibits any corporation from making a contribution or expenditure in connection with any federal election. The Act further prohibits any officer or any director of any corporation from consenting to such contribution or expenditure by the corporation. A candidate and political committee are prohibited from accepting or receiving any corporate contribution. 2 U.S.C. § 441b(a).

The Act further provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. See also, 11 C.F.R. § 110.4(b). The Act defines the term "person" to include a corporation. 2 U.S.C. § 431(11). This prohibition includes a corporation's repayment, reimbursement, or other compensation to any person for his or her contribution to any federal candidate or political committee. See Advisory Opinion 1986-41. The Commission has also determined that persons or entities that assist in the making of a contribution in the name of another may be found in violation of Section 441f.

Senator Charles Grassley was a candidate for re-election to

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the U.S. Senate from the State of Iowa in 1986. His principal campaign committee for that election was the Grassley Committee, Inc. According to information ascertained in the normal course of the Commission's supervisory responsibilities, in early December 1985, Carl Russell Channell organized a fundraising breakfast on behalf of the 1986 re-election campaign of Senator Grassley. Channell apparently solicited \$1,000 contributions from several associates and acquaintances with respect to this fundraiser. The breakfast was held on or about December 12 or 13, apparently on Capitol Hill in the Senate dining room. Those present at the breakfast included Senator Grassley, his aide, Tom Synhorst; Carl Russell Channell, and Channell's associates, Glenn David Lane, Daniel Conrad, and Richard Miller. No contributions were apparently delivered to Senator Grassley at this breakfast.

Subsequent to the breakfast, however, 10 contributions of \$1,000 each were made and delivered to the Grassley Committee. These contributions, each for \$1,000, were from: Carl Russell Channell, Daniel Conrad, Francis Gomez, Esperanza Gomez, Glenn David Lane, Cynthia Lane, Richard Miller, Joy Miller, Eric Jon Olson, and F. Clifton Smith. The Grassley Committee reported the receipt of all of these contributions on December 24, 1985. All of them are reported as made with respect to the 1986 primary election.

Glenn David Lane was a fundraising consultant who worked for one of Channell's organizations in December 1985 and January 1986. At that time the active Channell organizations

included two corporations, the National Endowment for the Preservation of Liberty and the Channell Corporation. Mr. Lane has stated that he told Mr. Channell that he was financially unable to contribute to the Grassley campaign at the time of the request for a contribution. He stated further that Mr. Channell told him that he (Lane) would be reimbursed. A reimbursement of \$2,000 for Glenn David Lane's and Cynthia Lane's contributions was made. Channell described these payments as a "business expense reimbursement." The reimbursement was reportedly included in a check which paid Mr. Lane for his consulting services, apparently drawn on the account of one of the corporations operational at that time .

Therefore, there is reason to believe the National Endowment for the Preservation of Liberty, the Channell Corporation and Carl Russell Channell, as an officer or director of these corporations, violated 2 U.S.C. § 441b(a). There is also reason to believe the National Endowment for the Preservation of Liberty, the Channell Corporation, and Carl Russell Channell violated 2 U.S.C. § 441f.

21040322047

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2837
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Carl R. Channell
2032 Belmont Road, N.W., #210
Washington, D.C. 20009

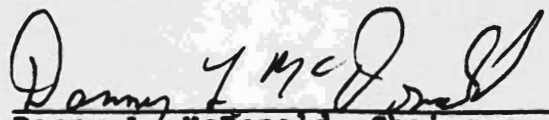
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

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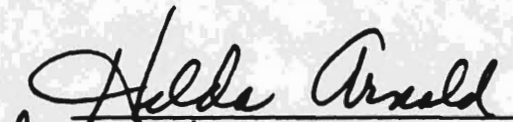
Carl R. Channell
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *20* , day
of *March* , 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:


for Marjorie W. Emmons
Secretary to the Commission

Attachments
Document Request and Questions (4 pages)

91040322049

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from November 1, 1985 to January 31, 1986.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**INTERROGATORIES
AND REQUEST FOR DOCUMENTS**

1. State whether you organized, sponsored, or arranged for a fundraising event on behalf of Senator Charles Grassley's 1986 re-election campaign. If so, state the date and place of this event, who attended it, with whom you arranged or coordinated this event with respect to Senator Grassley's campaign, and, if expenses were incurred with respect to the event, provide an itemization of such expenses and who paid such expenses.

2. State whether you solicited or requested persons to make contributions to Senator Grassley's 1986 re-election campaign with respect to the fundraising event described in your response to Question 1. If so,

(a) identify all such persons and the amount of all such contributions;

(b) identify all other persons who either attended the fundraising event described in your response to Question 1 or made contributions to Senator Grassley's 1986 re-election campaign with respect to this event and the amount of all such contributions; and

(c) state when all contributions identified in your response to this question were delivered to Senator Grassley or his authorized campaign committee(s) or to any person on behalf of him or his committee(s).

3. State whether any of the persons identified in your response to Question 2 sought or requested, in any manner, reimbursement or compensation from or through you for their contribution to Senator Grassley's 1986 re-election campaign. If so, identify all such persons and, for each one, describe in detail the circumstances regarding their request or seeking reimbursement or compensation.

4. State whether any of the persons identified in your response to Question 2 were reimbursed or compensated, in any manner, by or through you for their contribution to Senator Grassley's 1986 re-election campaign. If so, identify all such persons and, for each one, describe in detail the date, amount, and manner of reimbursement or compensation, including the identity of the banking institution and account number(s) used in making all such reimbursements or compensation.

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5. For the period between November 1, 1985, and January 31, 1986, identify the banking institution(s) and account number(s) for all accounts controlled by you or for which your name was on the signature card, including but not limited to all accounts maintained by the National Endowment for the Preservation of Liberty, the American Conservative Trust, the Channell Corporation, and any other organization controlled by you or for which you had established a banking account.

6. (a) Provide a copy of all checks written on all of the accounts identified in your response to Question 5 for the period between November 1, 1985, and January 31, 1986.

(b) For all checks provided in response to Question 6(a) and made payable to persons identified in your response to Question 2, describe in detail the basis and purpose for all such checks. Provide all invoices and other documents in support of your response to this question.

7. State whether Tom Synhorst, Senator Grassley, or any person representing Senator Grassley's 1986 re-election campaign was made aware, in any manner, that one or more of the persons identified in your response to Questions 3 or 4 had sought or requested reimbursement or compensation or had been reimbursed or compensated for their contributions to Senator Grassley's 1986 re-election campaign. If so, describe in detail what information was provided to Tom Synhorst, Senator Grassley, or any person representing Senator Grassley's 1986 re-election campaign, who provided the information, and the circumstances and manner in which such information was provided. Provide all documents in support of or relating to your response to this question.

91040322053



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 22, 1989

Glenn David Lane
1002 N. Sycamore St.
Falls Church, VA 22046

RE: MUR 2837
Glenn David Lane

Dear Mr. Lane:

On March 14, 1989, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

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

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the 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 the 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, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

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Glenn David Lane
Page 2

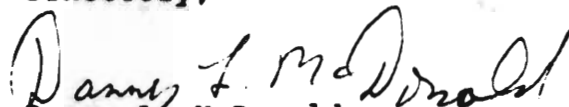
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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

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 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 Sandra Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Questions

21040322055

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Glenn David Lane

MUR: 2837

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The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. See also, 11 C.F.R. § 110.4(b). Thus, an individual could not reimburse or otherwise compensate another person for his or her contribution to Senator Grassley with respect to any federal election. Also, a person could not make a contribution to Senator Grassley in his or her own name with funds provided to him or her for that purpose by another person.

According to information ascertained in the normal course of carrying out the Commission's supervisory responsibilities, in early December 1985 Carl Russell Channell organized a fundraising breakfast on behalf of the 1986 re-election campaign of Senator Charles Grassley. Channell apparently solicited \$1,000 contributions from several associates and acquaintances with respect to this fundraiser. The breakfast was held on or about December 12 or 13, apparently on Capitol Hill in the Senate dining room. Those present at the breakfast included Senator Grassley, his aide Tom Synhorst, Carl Russell Channell, and his associates Glenn David Lane, Daniel Conrad, and Richard Miller. No contributions were apparently delivered to Senator Grassley at

this breakfast.

Nevertheless, subsequent to the breakfast, 10 contributions of \$1,000 each were made and delivered to the Grassley Committee. These contributions, each for \$1,000, were from: Carl Russell Channell, Daniel Conrad, Francis Gomez, Esperanza Gomez, Glenn David Lane, Cynthia Lane, Richard Miller, Joy Miller, Eric Jon Olson, and F. Clifton Smith. The Grassley Committee reported the receipt of all of these contributions on December 24, 1985. All of them are reported as made with respect to the 1986 primary election.

Glenn David Lane has stated he told Channell that he was financially unable to contribute to the Grassley campaign at that time and that Channell told him he (Lane) would be reimbursed. A reimbursement of \$2,000 for Glenn David Lane's and Cynthia Lane's contributions was made. Channell described these payments as a "business expense reimbursement." The reimbursement was reportedly included in a check which paid Lane for his consulting services.

Therefore, there is reason to believe Glenn David Lane has violated 2 U.S.C. § 441f.

7140322057

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2837
)

**INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS**

TO: Glenn David Lane
1002 N. Sycamore Street
Falls Church, VA 22046

91040322058

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from November 1, 1985 to January 31, 1986.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

91040323059

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**INTERROGATORIES
AND REQUEST FOR DOCUMENTS**

- 21040122061
1. State whether you made a contribution to Senator Charles Grassley's 1986 re-election campaign. If so, state the date and amount of your contribution and the date and person(s) to whom you gave the contribution. Provide a copy of the front and back of your contribution check.
 2. State whether you attended a fundraising event on behalf of Senator Grassley's 1986 re-election campaign. If so, state the date and place of the event, who invited or requested that you attend the event, and describe in detail what was discussed at this event.
 3. State whether Carl Russell Channell solicited or requested a contribution from you to Senator Grassley's 1986 re-election campaign. If so, describe in detail what you were told and the date and place you were solicited or the request was made.
 4. State whether you informed Carl Russell Channell, in any manner, that you were financially unable to make the contribution described in your response to question 3. If so, describe in detail what you told Mr. Channell and the date and place you provided him with this information.
 5. State whether Carl Russell Channell indicated to you in any manner that you would be reimbursed or compensated for your contribution described in your response to Question 3. If so, describe in detail what Mr. Channell told you and the date and place he made this information known to you.
 6. State whether you were reimbursed or compensated for your contribution to Senator Grassley's 1986 re-election campaign. If so, identify who reimbursed or compensated you, the date and place you received such reimbursement or compensation, the manner in which such reimbursement or compensation was made to you, and the amount of such reimbursement or compensation, and, if reimbursement or compensation was made by check, the person or organization whose account was used to make such payment and the banking institution and account number from which such payment was made.
 7. State whether you were employed by Carl Russell Channell or any organization controlled by him for the period including November 1, 1985, through January 31, 1986. If so, describe in detail the length and nature of your employment and the services you performed.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 22, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tom Synhorst
3118 Tennyson Street, N.W.
Washington, D.C. 20015

RE: MUR 2837

Dear Mr. Synhorst:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Commission has issued the attached interrogatories and request for documents, which requires you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

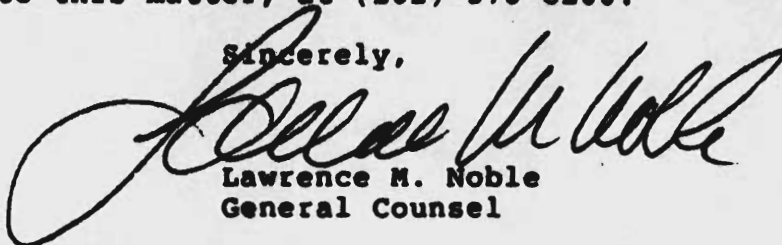
You may consult with an attorney and have an attorney assist you in the preparation of your responses to these interrogatories and request for documents. However, you are required to submit the information within 15 days of your receipt of this letter. All answers to questions must be submitted under oath.

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Tom Synhorst
Page 2

If you have any questions, please contact Sandra Robinson,
the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", is written over the typed name and title.

Lawrence M. Noble
General Counsel

Enclosure
Interrogatories and Request for Documents

21040322063

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2837
)

**INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS**

TO: Tom Synhorst
3118 Tennyson Street, N.W.
Washington, D.C. 20015

91040322064

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from November 1, 1985 to January 31, 1986.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

21040322035

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named person or entity in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

91040822066

**INTERROGATORIES
AND REQUEST FOR DOCUMENTS**

1. State whether you organized, coordinated, arranged, or participated in any fundraising event on behalf of Senator Charles Grassley's 1986 re-election campaign with Carl Russell Channell. If so, state the date and place of this event, who attended it and, if expenses were incurred with respect to the event, provide an itemization of such expenses and who paid such expenses.
2. State whether you solicited or requested any persons to make contributions to Senator Grassley's 1986 re-election campaign with respect to the fundraising event described in your response to Question 1. If so, identify all such persons and the date and amount of all such contributions.
3. State whether you informed Carl Russell Channell that persons attending the fundraising event described in your response to Question 1 or making contributions with respect to such event must contribute \$1,000 per person and whether such contributions would be attributable to the contributor's contribution limitation with respect to the 1986 primary election.
4. State when contributions made to Senator Grassley's 1986 re-election campaign with respect to the fundraising event described in your response to Question 1 were actually delivered to you, Senator Grassley, or any person representing Senator Grassley's 1986 re-election campaign.
5. State whether you learned, in any manner, that any person who made a contribution with respect to the event described in your response to Question 1 had sought or requested reimbursement or compensation for his or her contribution or had been reimbursed or compensation for his or her contribution. If so,
- (a) identify all such persons;
 - (b) identify the source as well as the means and method of all such reimbursements or compensation;
 - (b) describe in detail what you were told, who told you, when you were told, and the circumstances by which you learned of all such reimbursements or compensation.
6. Describe in detail your role or relationship with Senator Grassley's 1986 re-election campaign for the period between November 1, 1985, and January 31, 1986, and whether you were compensated or reimbursed for expenses by the campaign during this period.

91040322067



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 22, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Webb C. Hayes, IV
Chairman of the Board and President
The Palmer National Bank
1667 K Street, N.W.
Box 65466
Washington, D.C. 20035

RE: MUR 2837

Dear Mr. Webb:

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Commission has issued the attached order and subpoena which requires you to provide certain information in connection with an investigation it is conducting. The Commission does not consider you a respondent in this matter, but rather a witness only.

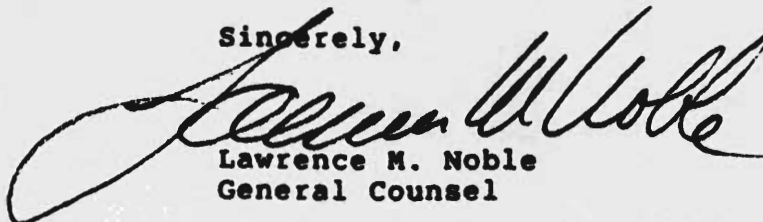
Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, you are required to submit the information within 15 days of your receipt of this subpoena and order. All answers to questions must be submitted under oath.

The Palmer National Bank
Page 2

If you have any questions, please contact Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", is written over the typed name and title.

Lawrence M. Noble
General Counsel

Enclosure
Subpoena and Order

91040322069

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2837
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Webb C. Hayes IV
Chairman of the Board and President
The Palmer National Bank
1667 K Street, N.W.
Box 65466
Washington, D.C. 20035

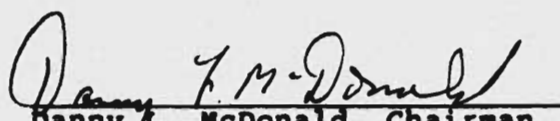
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 20 days of receipt of this Order and Subpoena.

91040322070

Palmer National Bank
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this 20 , day
of March , 1989.


Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:


for Marjorie W. Emmons
Secretary to the Commission

Attachments
Document Request and Questions (3 pages)

21040322071

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from November 1, 1985 to January 31, 1986.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

21040822072

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named person or entity in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

21040322073

**INTERROGATORIES
AND REQUEST FOR DOCUMENTS**

1. For the period between November 1, 1985, and January 31, 1986, identify all accounts (to include account holder, type of account and account number) maintained at The Palmer National Bank on behalf of the National Endowment for the Preservation of Liberty and the Channell Corporation.
2. Provide true copies of all statements and all checks written on all accounts identified in your response to Question 1 for the period covering November 1, 1985, through January 31, 1986.
3. Provide true copies of all signature cards, which were in effect for the period covering November 1, 1985, through January 31, 1986, on all accounts identified in your response to Question 1.

91040622074

MUN 2885
Doc 2471

NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY SPEC 1

ACCOUNT NUMBER 40000494

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)	Print Name(s)	Title
	CARL R. CHANNELL	PRESIDENT
	DANIEL L. CONRAD	EXEC. DIRECTOR/SECRETARY
	F. CLIFTON SMITH	TREASURER

Mailing Address
1331 PENNSYLVANIA AVE. NW SUITE 350S WASHINGTON, DC 20004
202 662-8700 52 1367059
Secretary's Telephone Number Tax Identification Number

Type of Business
SUPERCEEDS OLD CARD
The Palmer National Bank Date Opened Approved By Initial Deposit
PBD 204 (10/83)

National Endowment
for the Pres. of Liberty

Special
Account # 40000994

ACCOUNT NAME
The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)	Print Name(s)	Title
	CARL CHANNELL	President
	F. CLIFTON SMITH	Consultant / Pres. Dir.
	DANIEL L. CONRAD	EX. Dir.

Mailing Address
305 4th Street, NE Suite 1000
Washington, D.C. 20002
Secretary's Telephone Number 52-1367059
Type of Business
SUPERCEEDS OLD CARD
The Palmer National Bank Date Opened Approved By Initial Deposit
PBD 204 (10/83)

91040322075

APR 19 1985

National Endowment for the Preservation of Liberty

ACCOUNT NAME <u>Special Account #1</u>		ACCOUNT NUMBER <u>40000494</u>
*The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card		
Authorized signature(s)	Print Name(s)	Title
	CARL R. CHANNELL	PRESIDENT
Mailing Address		
<u>1331 Pennsylvania Ave. NW Ste 350S Washington, D.C. 20004</u>		
Secretary's Telephone Number <u>(202) 662-8715</u>		Tax Identification Number <u>1E1D</u>
Type of Business	Bank Reference <u>9-23-85</u>	Account Officer
The Palmer National Bank	Date Opened <u>11-19-85</u>	Initial Deposit
Approved By		PBD 204 (10/83)

NATIONAL ENDOWMENT FOR THE PRESERVATION OF LIBERTY -SPEC #1

ACCOUNT NAME		ACCOUNT NUMBER <u>40000494</u>
The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card		
Authorized signature(s)	Print Name(s)	Title
	CARL R. CHANNELL	PRESIDENT
	DANIEL L. CONRAD	EXEC. DIRECTOR/SECRETARY
	F. CLIFTON SMITH	TREASURER
Mailing Address		
<u>1331 PENNSYLVANIA AVE. NW SUITE 350S WASHINGTON, DC 20004</u>		
Secretary's Telephone Number <u>202 662-8700</u>		Tax Identification Number <u>52 1367059</u>
Type of Business	DATE <u>11-19-85</u>	Account Officer
The Palmer National Bank	BY <u>AMOUNT</u>	Initial Deposit
Date Opened	Approved By	PBD 204 (10/83)

21040322076

National Endowment for the Preservation of Liberty

ACCOUNT NAME Special Account #1

ACCOUNT NUMBER 40000494

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

Carl Channell CARL R CHANNELL PRESIDENT

Mailing Address

1331 Pennsylvania Ave. NW Suite 350 S
Washington D.C. 20004 662-8715

Secretary's Telephone Number

Tax Identification Number

Type of Business

Bank Reference

CEO
Account Officer

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

9-23-85
SUPERCEEDS OLD CARD

PBD 204 (10/83)

SPECIAL ACCOUNT #1

NATIONAL ENDOWMENT FOR THE PRESERVATION OF LIBERTY

ACCOUNT NAME

ACCOUNT NUMBER

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

Carl Channell Carl Channell PRESIDENT
F. Clifton Smith F. Clifton Smith CONSULTANT/PROJECT
David Lynn Conrad David Lynn Conrad EXECUTIVE DIRECTOR

Mailing Address

543-6137 305 4th Street, NE Suite 1000
547-1986 Washington, DC.. 20002

Secretary's Telephone Number

543-6300

12/4/85

Type of Business

Bank Reference

SUPERCEEDS OLD CARD

The Palmer National Bank

Date Opened

Langela Davis
a Philip Meo
may make wire
+ acct transfers
4/86

21040322077

OTHER DEBITS.....91040822078.....

02002734

DATE	AMOUNT	DESCRIPTION
11/05	10.00	MISCELLANEOUS DEBIT

CHECKS.....

DATE...	CK NO.....	AMOUNT	DATE...	CK NO.....	AMOUNT
11/26		2,500.00	11/25	1339	3,500.00
11/04 *	1361	26.15	11/14 *	1383	984.52
11/30 *	1390	190.50	11/01 *	1395	453.00
11/06 *	1403	60.00	11/01 *	1405	939.20
11/05 *	1408	226.12	11/04	1409	1,599.87
11/04	1410	1,490.80	11/05 *	1412	1,083.25
11/04	1413	1,474.15	11/06 *	1415	4,401.53
11/04	1416	137.79	11/07	1417	1,851.22
11/04	1418	1,830.30	11/14	1419	10.00
11/05	1420	100.20	11/05	1421	432.59

**** CONTINUED ****

2002734

11/30/05

91040322079

40000494

11/30/85

C NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY
SPECIAL ACCOUNT NUMBER 1
305 4TH ST, NE SUITE 1000
WASHINGTON, D.C.

20002

TAX ID NUMBER: 521-36-7059 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR SUPER NOW ACCOUNTS

PREVIOUS STATEMENT BALANCE	47,521.28	AS OF 10/31/85
1 CREDITS TOTALING	181.63	
4 DEBITS TOTALING	23,210.00	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE

24,492.91

YTD INTEREST
505.02

AVERAGE CYCLE BALANCE

34,975.94

AVERAGE COLLECTED BALANCE

34,975.94

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
11/30	181.63	SUPER NOW ACCT INT

OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
11/15	5,210.00	MISCELLANEOUS DEBIT

CHECKS.....

DATE...	CK NO.	AMOUNT	DATE...	CK NO.	AMOUNT
11/05	1009	3,000.00	11/15	1010	10,000.00
11/20	1011	5,000.00			

DAILY BALANCE SUMMARY 9.1.0.4.0.3.2.2.0.8.0.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
11/05	44,521.28	11/20	24,311.28		
11/15	29,311.28	11/30	24,492.91		

4000494

~~4000508~~

~~11/30/00~~

J

MYRON D. GERBER
 SYLVAN GERBER
 7536 HAMDEN LAND

M

I

91040322081

40000494

12/31/85

C NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY
SPECIAL ACCOUNT NUMBER 1
305 4TH ST, NE SUITE 1000
WASHINGTON, D.C. 20002

M

1

TAX ID NUMBER: 521-36-7059 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR SUPER NOW ACCOUNTS

PREVIOUS STATEMENT BALANCE	24,492.91	AS OF 11/30/85
3 CREDITS TOTALING	60,602.48	
8 DEBITS TOTALING	43,700.00	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	41,395.39	YTD INTEREST 607.50
AVERAGE CYCLE BALANCE	30,992.91	
AVERAGE COLLECTED BALANCE	17,412.26	

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
12/04	500.00	REGULAR DEPOSIT
12/19	60,000.00	REGULAR DEPOSIT
12/31	102.48	SUPER NOW ACCT INT

OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
12/04	500.00	MISCELLANEOUS DEBIT

CHECKS.....91040822082.....

DATE...	CK NO.....	AMOUNT	DATE...	CK NO.....	AMOUNT
12/06	1012	2,000.00	12/17	1013	5,000.00
12/09	1014	7,500.00	12/12	1015	3,700.00
12/23	1016	1,000.00	12/24	1017	20,000.00
12/23	1018	4,000.00			

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
12/04	24,492.91	12/12	11,292.91	12/23	61,292.91
12/06	22,492.91	12/17	6,292.91	12/24	41,292.91
12/09	14,992.91	12/19	66,292.91	12/31	41,395.39

91040322083

40000494

1/31/86

NATIONAL ENDOWMENT FOR THE

PRESERVATION OF LIBERTY

SPECIAL ACCOUNT NUMBER 1

305 4TH ST, NE SU TE 1000

WASHINGTON, D.C.

20002

M

1

TAX ID NUMBER: 521-36-7059 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR SUPER NOW ACCOUNTS

PREVIOUS STATEMENT BALANCE	41,395.39	AS OF 12/31/85
3 CREDITS TOTALING	55,263.93	
8 DEBITS TOTALING	46,527.19	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	50,132.13	YTD INTEREST 63.93
AVERAGE CYCLE BALANCE	11,538.82	
AVERAGE COLLECTED BALANCE	11,538.82	

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
1/17	5,200.00	MISCELLANEOUS CREDIT
1/31	63.93	SUPER NOW ACCT INT
1/31	50,000.00	MISCELLANEOUS CREDIT

CHECKS.....2.1.0.4.0.3.2.2.0.8.4.....

DATE...	CK NO.....	AMOUNT.....	DATE...	CK NO.....	AMOUNT.....
1/03	1019	10,000.00	1/03	1020	10,000.00
1/06	1021	2,500.00	1/06	1022	3,000.00
1/15	1023	542.38	1/13	1024	12,500.00
1/21	1025	5,984.81	1/23	1026	2,000.00

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE.....	DATE.....	BALANCE.....	DATE.....	BALANCE.....
1/03	21,395.39	1/15	2,853.01	1/23	68.20
1/06	15,895.39	1/17	8,053.01	1/31	50,132.13
1/13	3,395.39	1/21	2,068.20		

**NATIONAL ENDOWMENT FOR THE PRESERVATION OF LIBERTY
FUTURE OF FREEDOM**

ACCOUNT NAME

ACCOUNT NUMBER **02007649**

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

[Handwritten signatures]

CARL R. CHANNELL

PRESIDENT

DANIEL L. CONRAD

EXEC. DIRECTOR/SECRETARY

J. CLIFTON SMITH

TREASURER

ACCOUNT CLOSED

Mailing Address

1331 PENNSYLVANIA AVE, NW SUITE 3505 WASHINGTON, DC 20004

202 662-8700

BY AMOUNT

52 1367059

Secretary's Telephone Number

Tax Identification Number

Type of Business

UPPERCEEDS OLD CARD

Account Officer

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

PBD 204 (10/83)

*National Endowment for the
Preservation of Liberty*

ACCOUNT NAME *Future of Freedom Program*

ACCOUNT NUMBER **02007649**

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

[Handwritten signature]

CARL CHANNELL

PRESIDENT

Mailing Address

1331 Pennsylvania Ave NW Ste. 3505 Washington, D.C. 20004

202 662 8715

Secretary's Telephone Number

Tax Identification Number

Type of Business

Bank Reference

Account Officer

12-19-85

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

PBD 204 (10/83)

91040323085

**NATIONAL ENDOWMENT FOR THE PRESERVATION OF LIBERTY
FUTURE OF FREEDOM**

ACCOUNT NAME

ACCOUNT NUMBER **02007649**

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized Signature(s)

Print Name(s)

Title

[Handwritten signatures: Carl R. Channell, Daniel L. Conrad, J. Clifton Smith]

CARL R. CHANNELL

PRESIDENT

DANIEL L. CONRAD

SECRETARY

J. CLIFTON SMITH

TREASURER

DATE

BY

6-1-87

Mailing Address

1331 PENNSYLVANIA AVE. NW SUITE 350S WASHINGTON, DC 20004

202 662-8700

52 1367059

Secretary's Telephone Number

Tax Identification Number

Type of Business

UPPERCROSS OLD AND

Bank Reference

Account Officer

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

*National Endowment for the
Preservation of Liberty*

ACCOUNT NAME

ACCOUNT NUMBER **02007649**

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized Signature(s)

Print Name(s)

Title

[Handwritten signature: Carl R. Channell]

Carl R. Channell

President

1331 PENNSYLVANIA AVE.,
N.W.

SUITE 350 SOUTH

WASHINGTON, D.C. 20004

Tax Identification Number

(202) 662-8700 CED

Type of Business

Bank Reference

Account Officer

12-19-85

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

91040322086

91040822087

2007649

12/19/00

C NATIONAL ENDOWMENT FOR THE
 PRESERVATION OF LIBERTY
 FUTURE OF FREEDOM PROGRAM
 305 4TH ST., NE SUITE 1000
 WASHINGTON, D.C. 20002

M

1

TAX ID NUMBER: 521-36-759 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND	EPOSIT	
PREVIOUS STATEMENT BALANCE	.00	AS OF 0/00/00
1 CREDITS TOTALING	100.00	
0 DEBITS TOTALING	.00	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	100.00	
AVERAGE CYCLE BALANCE	100.00	
AVERAGE COLLECTED BALANCE	100.00	

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
12/19	100.00	REGULAR DEPOSIT

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
12/19	100.00				

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2007649

1/31/85

C NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY
FUTURE OF FREEDOM PROGRAM
305 4TH ST., NE SUITE 1000
WASHINGTON, D.C. 20002

M

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TAX ID NUMBER: 521-36- 059 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE	100.00	AB OF 12/31/85
2 CREDITS TOTALING	95,000.00	
8 DEBITS TOTALING	47,489.59	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	47,610.41	
AVERAGE CYCLE BALANCE	48,460.32	
AVERAGE COLLECTED BALANCE	34,363.55	

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
1/02	75,000.00	REGULAR DEPOSIT
1/28	20,000.00	MISCELLANEOUS CREDIT

OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
1/06	50.18	PRINTED CHECK CHARGE

9 1 0 4 0 3 2 2 0 8 9

CHECKS.....					
DATE...	CK NO.	AMOUNT	DATE...	CK NO.	AMOUNT
1/03	1001	7,000.00	1/03	1002	10,802.85
1/06	1003	2,500.00	1/06	1004	3,000.00
1/07	1005	819.41	1/17	1006	3,317.15
1/27	1007	20,000.00			

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
1/02	75,100.00	1/07	50,927.56	1/28	47,610.41
1/03	57,297.15	1/17	47,610.41		
1/06	51,746.97	1/27	27,610.41		

2007657

1/31/86

91040322090

National Endowment For the Preservation of Liberty *Special Account*
#2 02007576

ACCOUNT NAME _____ ACCOUNT NUMBER 02007576

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)	Print Name(s)	Title
<i>[Signature]</i>	Carl Channell	President
<i>[Signature]</i>	F. Clifton Smith	Pro. Dir.
<i>[Signature]</i>	Daniel L. Conrad	Ex. Dir.

Mailing Address 305 4th Street Suite 1000
Washington, DC 20002

DATE 5-17-86

Secretary's Telephone Number 543-6300, 543-6137

Tax Identification Number 52-1367059

Amount

Bank Reference

Type of Business

The Palmer National Bank Date Opened 12/4/85 Approved By Initial Deposit PBD 204 (10/83)

NATIONAL ENDOWMENT FOR THE PRESERVATION OF LIBERTY-SPEC #2

ACCOUNT NAME _____ ACCOUNT NUMBER 02007576

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)	Print Name(s)	Title
<i>[Signature]</i>	CARL R. CHANNELL	PRESIDENT
<i>[Signature]</i>	DANIEL L. CONRAD	EXEC. DIRECTOR/SECRETARY
<i>[Signature]</i>	F. CLIFTON SMITH	TREASURER

Mailing Address 1331 PENNSYLVANIA AVE. NW SUITE 350S WASHINGTON, DC 20004

202 662-8700 52 1367059

Secretary's Telephone Number Tax Identification Number

Type of Business Bank Reference SUPERCEEDS OLD CARD 11-19-86 Account Officer

The Palmer National Bank Date Opened Approved By Initial Deposit PBD 204 (10/83)

National Endowment for
the Preservation of Liberty

ACCOUNT NAME Special Account #2

ACCOUNT NUMBER 03007576

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

[Signature] Carl R. Channell President

Mailing Address

1331 Pennsylvania Ave NW Ste 350S Washington, D.C. 20004

(202) 462-8715

Secretary's Telephone Number

Tax Identification Number

CEO

Type of Business

Bank Reference

Account Officer

12-4-85

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

~~SUPERCEEDS OLD CARD~~

PBD 204 (10/83)

National Endowment for the
Preservation of Liberty

ACCOUNT NAME Special Account #2

ACCOUNT NUMBER 02007576

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

[Signature] Carl R. Channell President

Mailing Address

1331 Pennsylvania Ave. Suite 350S

Washington, D.C. 20004

Secretary's Telephone Number

Tax Identification Number

(202) 662-8700

CEO

Type of Business

Bank Reference

Account Officer

12-4-85

MMA

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

~~SUPERCEEDS OLD CARD~~

PBD 204 (10/83)

91040322091

National Endowment for the Preservation of Liberty

Special Account #2 ACCOUNT NUMBER 03007576

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signatories: Carl Channell President
Clifton Smith Pres. Dir.
Daniel L. Conrad Ex. Dir.

Mailing Address: 305 4th Street, NE Suite 1000
 Washington, DC 20002

Secretary's Telephone Number: 52-1367059

Type of Business: Bank Reference: Account Officer: CEO

The Palmer National Bank Date Opened: 12/4/85 Approved By: Initial Deposit: PBD 204 (10/83)

NATIONAL ENDOWMENT FOR THE PRESERVATION OF LIBERTY-SPEC #2

ACCOUNT NAME ACCOUNT NUMBER 02007576

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signatories: Carl R. Channell PRESIDENT
Daniel L. Conrad EXEC. DIRECTOR/SECRETARY
Clifton Smith TREASURER

Mailing Address: 1331 PENNSYLVANIA AVE. NW SUITE 3508 WASHINGTON DC 20004
 202 662-8700

Secretary's Telephone Number: 52 1367059 Tax Identification Number: 74-46

Type of Business: SUPERCHARGED OLD CARD Account Officer:

The Palmer National Bank Date Opened: Approved By: Initial Deposit: PBD 204 (10/83)

21040322092

91040322093

0208 7576

12/20

NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY
SPECIAL ACCOUNT #2
305 4TH ST, NE SUITE 1000
WASHINGTON, D.C. 20002

TAX ID NUMBER: 521-36-7059 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE	.00	AS OF 6/00/00
2 CREDITS TOTALING	20,500.00	
1 DEBITS TOTALING	42.97	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE 20,457.03

AVERAGE CYCLE BALANCE 15,481.58

AVERAGE COLLECTED BALANCE 11,175.87

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
12/04	500.00	REGULAR DEPOSIT
12/11	20,000.00	REGULAR DEPOSIT

OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
12/20	42.97	PRINTED CHECK CHARGE

DAILY BALANCE SUMMARY.....

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
12/04	500.00	12/11	20,500.00	12/20	20,457.03

91040822094

2007576

1/31/86

NATIONAL ENDOWMENT FOR THE
 PRESERVATION OF LIBERTY
 SPECIAL ACCOUNT #2
 305 4TH ST, NE SUITE 1000
 WASHINGTON, D.C. 20002

M

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TAX ID NUMBER: 521-36- '059 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE	20,457.03	AS OF 12/31/85
1 CREDITS TOTALING	1,400.00	
3 DEBITS TOTALING	8,354.25	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	13,502.78	
AVERAGE CYCLE BALANCE	18,575.72	
AVERAGE COLLECTED BALANCE	18,395.07	

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
1/02	1,400.00	REGULAR DEPOSIT

CHECKS.....

DATE...	CK NO...	AMOUNT	DATE...	CK NO...	AMOUNT
1/06	1001	2,273.35	1/17	1002	1,080.90
1/27	1003	5,000.00			

BALANCE SUMMARY.....

DAILY BALANCE SUMMARY.....91040822095.....

DATE.....BALANCE DATE.....BALANCE DATE.....BALANCE

1/17 21,857.03 1/17 18,502.78

1/27 19,563.68 1/27 13,502.78

2007584

1/31/84

91040322096

ACCOUNT NAME SENTINEL		ACCOUNT NUMBER 02006960	
*The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card			
Authorized signature(s)		Print Name(s)	Title
		Carl Channell	President
		F. Clifton Smith	Pub. Dir.
		Daniel Lynn Conrad	Ex. Dir.
BY _____			
Mailing Address			
305 4th Street, NE Suite 3000			
Washington, DC.. 20002			
Secretary's Telephone Number		Tax Identification Number	
12/4/85			
Type of Business		Bank Reference	Account Officer
SUPERCEEDS OLD CARD			
The Palmer National Bank		Date Opened	Approved By
			Initial Deposit
			PBD 204 (10/83)

ACCOUNT NAME SENTINEL		ACCOUNT NUMBER 02006960	
*The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card			
Authorized signature(s)		Print Name(s)	Title
		Carl Channell	President
		F. Clifton Smith	Pub. Dir.
		Daniel Lynn Conrad	Ex. Dir.
Mailing Address			
305 4th Street, NE Suite 3000			
Washington, D.C. 20002			
Secretary's Telephone Number		Tax Identification Number	
12/4/85			
Type of Business		Bank Reference	Account Officer
SUPERCEEDS OLD CARD			
The Palmer National Bank		Date Opened	Approved By
			Initial Deposit
			PBD 204 (10/83)

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2006960

11/25/85

C SENTINEL
SUITE 3000
305 4TH STREET, NE
WASHINGTON, D.C.

20002

M

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TAX ID NUMBER: 888-88-8638 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE	35.83	AS OF 10/31/85
0 CREDITS TOTALING	.00	
1 DEBITS TOTALING	4.92	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE 30.91

AVERAGE CYCLE BALANCE 30.91

AVERAGE COLLECTED BALANCE 30.91

OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
11/01	4.92	ANALYSIS SERVICE CHARGE

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
11/01	30.91				

91040822098

2006960

12/02

SENTINEL

SUITE 3000

305 4TH STREET, NE

WASHINGTON, D.C.

20002

M

1

TAX ID NUMBER: 888-88-88E - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE 30.91 AS OF 11/30/85

0 CREDITS TOTALING .00

1 DEBITS TOTALING 4.95

SERVICE CHARGE AMOUNT .00

CURRENT STATEMENT BALANCE 25.96

AVERAGE CYCLE BALANCE 26.11

AVERAGE COLLECTED BALANCE 26.11

OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
12/02	4.95	ANALYSIS SERVICE CHARGE

DAILY BALANCE SUMMARY.....

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
12/02	25.96				

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2006960

1/31/85

C SENTINEL
SUITE 3000
305 4TH STREET, NE
WASHINGTON, D.C.

20002

M

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TAX ID NUMBER: 888-88-88 8 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND D POSIT

PREVIOUS STATEMENT BALANCE	25.96	AS OF 12/31/85
0 CREDITS TOTALING	.00	
1 DEBITS TOTALING	4.98	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	20.98	
AVERAGE CYCLE BALANCE	21.14	
AVERAGE COLLECTED BALANCE	21.14	

OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
1/02	4.98	ANALYSIS SERVICE CHARGE

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
1/02	20.98				

ACCOUNT NAME AMERICAN CON. TRUST ACCOUNT NUMBER 02001268

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)	Print Name(s)	Title
<i>Carl Russell Channel</i>	CARL RUSSELL CHANNEL	PRESIDENT
<i>F. Clayton Smith</i>	F. CLAYTON SMITH	POLITICAL DIRECTOR
<i>Daniel Lynn Conrad</i>	DANIEL LYNN CONRAD	EXECUTIVE DIRECTOR

Mailing Address
305 4th Street, NE Suite 210
Washington, D.C. 20002

Secretary's Telephone Number 1214185 Tax Identification Number 52-1370388

Type of Business SUPERCEEDS OLD CARD Bank Reference SAH Account Officer

The Palmer National Bank Date Opened Approved By Initial Deposit
 PBD 204 (10/83)

ACCOUNT NAME American Conservative Trust ACCOUNT NUMBER 02001268

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)	Print Name(s)	Title
<i>Carl Channel</i>	CARL CHANNEL	PRESIDENT
<i>Christina Crawford</i>	CHRISTINA CRAWFORD	SECRETARY
<i>Roger Wilkins</i>	ROGER WILKINS	AS OF 11/2/83

Mailing Address
Suite 210, 305 4th Street, N.E.
Washington, D.C. 20002

Secretary's Telephone Number 703-698-9243 Tax Identification Number Pending

Type of Business Bank Reference Account Officer
SAH

The Palmer National Bank Date Opened Approved By Initial Deposit
9/22/83 trm \$1.00

21040322100

91040322101

TEMPORARY CARD

ACCOUNT NAME AMERICAN CONSERVATIVE TRUST ACCOUNT NUMBER 02001268

*The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)	Print Name(s)	Title
<i>[Signature]</i>	Spitz Channell	PRESIDENT
<i>[Signature]</i>	Roger Wilkins	ADMIN. ASST.
<i>[Signature]</i>	Cliff Smith	POLITICAL DIRECTOR

Mailing Address
305 4th Street, NE WASH. 20002
(202) 543-6300 (OR) 543-1984

Secretary's Telephone Number
Political Action Committee

Type of Business
POLITICAL ACTION COMMITTEE

Bank Reference
SUPERCEEDS OLD CARD

Tax Identification Number
10/21/81

The Palmer National Bank Date Opened 9/22/83 Approved By trm Initial Deposit \$1.00
 FBO 204 (10/83)

SAH

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11/30/85

C

AMERICAN CONSERVATIVE TRUST

SUITE 210

M

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305 - 4TH STREET, NE

WASHINGTON, DC

20002

TAX ID NUMBER: 521-37-0389 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE 4,774.60 AS OF 10/31/85

0 CREDITS TOTALING .00

4 DEBITS TOTALING 575.90

SERVICE CHARGE AMOUNT .00

CURRENT STATEMENT BALANCE 4,198.70

AVERAGE CYCLE BALANCE 4,314.28

AVERAGE COLLECTED BALANCE 4,314.28

OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
11/05	40.00	MISCELLANEOUS DEBIT

CHECKS.....

DATE...	CK NO...	AMOUNT	DATE...	CK NO...	AMOUNT
11/26	1186	12.00	11/05	1187	453.76
11/18	1188	70.14			

DAILY BALANCE SUMMARY.....

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
------	---------	------	---------	------	---------

DAILY BALANCE SUMMARY 0.4.0.8.2.2.1.0.3.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
11/05	4,280.84	11/18	4,210.70	11/26	4,198.70

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11/30/

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12/31

C AMERICAN CONSERVATIVE TRUST

SUITE 210

M

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305 - 4TH STREET, NE

WASHINGTON, DC

20002

TAX ID NUMBER: 521-37-0387 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE 4,198.70 AS OF 11/30/85

1 CREDITS TOTALING 2,500.00

2 DEBITS TOTALING 537.50

SERVICE CHARGE AMOUNT .00

CURRENT STATEMENT BALANCE 6,161.20

AVERAGE CYCLE BALANCE 5,181.36

AVERAGE COLLECTED BALANCE 4,778.13

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
12/18	2,500.00	REGULAR DEPOSIT

CHECKS.....

DATE...CK NO.	AMOUNT	DATE...CK NO.	AMOUNT
12/23 1189	500.00	12/31 * 1191	37.50

DAILY BALANCE SUMMARY.....

DATE.....BALANCE	DATE.....BALANCE	DATE.....BALANCE
12/18 6,698.70	12/23 4,198.70	12/31 6,161.20

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2001269

1/31/85

C AMERICAN CONSERVATIVE TRUST

SUITE 210

M

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305 - 4TH STREET, NE

WASHINGTON, DC

20002

TAX ID NUMBER: 521-37-03 9 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND D POSIT

PREVIOUS STATEMENT BALANCE 6,161.20 AS OF 12/31/85

0 CREDITS TOTALING .00

3 DEBITS TOTALING 4,590.00

SERVICE CHARGE AMOUNT .00

CURRENT STATEMENT BALANCE 1,571.20

AVERAGE CYCLE BALANCE 2,590.55

AVERAGE COLLECTED BALANCE 2,590.55

OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
1/08	2,900.00	MISCELLANEOUS DEBIT

CHECKS.....

DATE...	CK NO.	AMOUNT	DATE...	CK NO.	AMOUNT
1/08	1190	1,500.00	1/21	1192	190.00

DAILY BALANCE SUMMARY.....

BALANCE

DAILY BALANCE SUMMARY 9.1.0.4.0.8.2.2.1.0.6.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
1/06	4,661.20	1/08	1,761.20	1/21	1,571.20

200127

1/31/0

American Conservative Trust

ACCOUNT NAME State Election Fund ACCOUNT NUMBER 02001276

*The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

<i>[Signature]</i>	<u>Art Russell Channell</u>	<u>President</u>
<i>[Signature]</i>	<u>F. Clifton Smith</u>	<u>Political Director</u>
<i>[Signature]</i>	<u>Daniel Lynn Conrad</u>	<u>Executive Director</u>

Mailing Address

305 4th Street, NE Suite 210

Washington, DC. 20002

Secretary's Telephone Number

12/4/85

Tax Identification Number

52-1370388

Type of Business

SUPERCEEDS OLD CARD

Account Officer

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

PBD 204 (10/83)

AMERICAN CONSERVATIVE TRUST

ACCOUNT NAME State Election Fund ACCOUNT NUMBER 02001276

*The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

<i>[Signature]</i>	<u>Spitz Channell</u>	<u>PRESIDENT</u>
<i>[Signature]</i>	<u>Roger Wilkins</u>	<u>ADMIN. ASST</u>
<i>[Signature]</i>	<u>Cliff Smith</u>	<u>POLITICAL DIRECTOR</u>

Mailing Address

305 4th Street, NE WASH 20002

543-1984 (OR) 543-6300

Secretary's Telephone Number

Tax Identification Number

Political Action Committee

10/24/84

Type of Business

SUPERCEEDS OLD CARD

Account Officer

SAH

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

9/22/84

trm

\$3,000.00

TEMPORARY CARD

91040322107

American Conservative Trust
State Election Fund

02001276

ACCOUNT NAME

ACCOUNT NUMBER

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

Carl R. Chandler

CARL R. CHANDLER President

Christina Crawford

CHRISTINA CRAWFORD Secretary

Roger Wilkins

ROGER WILKINS

AS OF 11/2/83

Address

Suite 210, 305 4th Street, N.E.

Washington, D.C. 20002

Secretary's Telephone Number

703-698-9243

Tax Identification Number

Pending

Type of Business

Bank Reference

Account Officer

SAH

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

9/22/83

trm

\$3,000.00

91040322108

21040322109

2001276

11/30/85

C AMERICAN CONSERVATIVE TRUST

STATE ELECTION FUND

M

1

SUITE 210

305 - 4TH STREET, NE

WASHINGTON, DC

20002

TAX ID NUMBER: 521-37-0388 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE 38,261.51 AS OF 10/31/85

0 CREDITS TOTALING .00

15 DEBITS TOTALING 34,789.81

SERVICE CHARGE AMOUNT .00

CURRENT STATEMENT BALANCE 3,471.70

AVERAGE CYCLE BALANCE 9,892.08

AVERAGE COLLECTED BALANCE 9,892.08

CHECKS.....

DATE...	CK NO.....	AMOUNT	DATE...	CK NO.....	AMOUNT
11/04	1489	16,000.00	11/04	1490	10,000.00
11/06	1491	276.00	11/08 *	1493	67.63
11/05 *	1495	1,440.63	11/05	1496	10.00
11/14	1497	1,000.00	11/12 *	1499	2,500.00
11/07	1500	8.00	11/19 *	1502	65.35
11/19 *	1504	3,000.00	11/27	1505	74.20
11/25	1506	8.00	11/25	1507	150.00
11/30	1508	190.00			

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DAILY BALANCE SUMMARY.....

02001274

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
11/04	12,261.51	11/08	10,459.25	11/25	3,735.90
11/05	10,810.88	11/12	7,959.25	11/27	3,661.70
11/06	10,534.88	11/14	6,959.25	11/30	3,471.70
11/07	10,526.88	11/19	3,893.90		

91040322111

2001276

12/85

C AMERICAN CONSERVATIVE TRUST

STATE ELECTION FUND

M

1

SUITE 210

305 - 4TH STREET, NE

WASHINGTON, DC

20002

TAX ID NUMBER: 521-37-0381 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE	3,471.70	AS OF 11/30/85
0 CREDITS TOTALING	.00	
3 DEBITS TOTALING	785.35	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	2,686.35	
AVERAGE CYCLE BALANCE	3,138.07	
AVERAGE COLLECTED BALANCE	3,138.07	

CHECKS.....

DATE...	CK NO.....	AMOUNT	DATE...	CK NO.....	AMOUNT
12/11	1509	255.35	12/16	1510	30.00
12/23	1511	500.00			

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
12/11	3,216.35	12/16	3,186.35	12/23	2,686.35

91040322112

2001276

1/31/85

C AMERICAN CONSERVATIVE TRUST

STATE ELECTION FUND

M

1

SUITE 210

305 - 4TH STREET, NE

WASHINGTON, DC

20002

TAX ID NUMBER: 521-37-0318 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND D POSIT

PREVIOUS STATEMENT BALANCE 2,686.35 AS OF 12/31/85

1 CREDITS TOTALING 2,900.00

2 DEBITS TOTALING 1,883.85

SERVICE CHARGE AMOUNT .00

CURRENT STATEMENT BALANCE 3,702.50

AVERAGE CYCLE BALANCE 3,574.38

AVERAGE COLLECTED BALANCE 3,574.38

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
1/08	2,900.00	MISCELLANEOUS CREDIT

CHECKS.....

DATE...	CK NO.	AMOUNT	DATE...	CK NO.	AMOUNT
1/06	1512	1,500.00	1/24	1513	383.85

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
1/06	1,186.35	1/08	4,086.35	1/24	3,702.50

**NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY**

OP

ACCOUNT NAME

ACCOUNT NUMBER

02002736

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

Carl R. Channell
Daniel L. Conrad
F. Clifton Smith

CARL R. CHANNELL

PRESIDENT

DANIEL L. CONRAD

EXEC. DIRECTOR & SECRETARY

F. CLIFTON SMITH

TREASURER

Mailing Address

1331 PENNSYLVANIA AVE. NW SUITE 350S

WASHINGTON, DC 20004

662-8700

52 1367059

Secretary's Telephone Number

Tax Identification Number

Type of Business

PERCEEDS OLD CARD 11-19-80

Account Officer

ACCOUNT CLOSED

The Palmer National Bank

Date Opened

DATE

Approved By

Initial Deposit

BY

AMOUNT (10/83)

Nation Endowment for

ACCOUNT NAME **the Preservation of Liberty**

ACCOUNT NUMBER

02002736

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

Carl R. Channell

CARL R. CHANNELL

President

Mailing Address

1331 Pennsylvania Ave NW Ste 350 S Washington, DC 20004

(202) 662-8705

Secretary's Telephone Number

Tax Identification Number

Type of Business

Bank Reference

CEO

Account Officer

The Palmer National Bank

Date Opened

11-29-84

Approved By

Initial Deposit

SUPERCEEDS OLD CARD

PBD 204 (10/83)

21040322113

Natl. Endowment for the Pres. of Liberty

ACCOUNT NAME

ACCOUNT NUMBER 02002736

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

<i>[Signature]</i>	CHANNELL	PRESIDENT
<i>[Signature]</i>	F. CLIFTON SMITH	CONSULTANT/PRE DIR.
<i>[Signature]</i>	WILL LYNN CORLEA	EX. DIR.

Mailing Address

543-6300 305 4th Street, NE Suite 1000
543-6137 Washington, D.C. 20002

Secretary's Telephone Number

Tax Identification Number

547-1986 12/4/85 52-1367059

Type of Business

Bank Reference

Account Officer

SUPERCEEDS OLD CARD

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

PBD 204 (10/83)

NATIONAL ENDOWMENT FOR THE

PRESERVATION OF LIBERTY

ACCOUNT NAME

ACCOUNT NUMBER 02002736

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

<i>[Signature]</i>	CELESTE CAMPBELL	PRESIDENT
<i>[Signature]</i>	ROGER WILKINS	TREASURER
<i>[Signature]</i>	EDUARDO J. DOMANUS	
<i>[Signature]</i>	ANTHONY FERRARA	TREASURER

Mailing Address

305 4th St., N.E., Suite 1000
Washington, D.C. 20002

Secretary's Telephone Number

Tax Identification Number

202/543-6300 52-1367059

Type of Business

Bank Reference

Account Officer

SAH

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

3/19/84 trm \$2.00

PBD 204 (10/83)

91040322114

NATIONAL ENDOWMENT FOR THE

ACCOUNT NAME **PRESERVATION OF LIBERTY**

ACCOUNT NUMBER **02002736**

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

	CARL R. CHANNELL	PRESIDENT
	DANIEL L. CONRAD	EXECUTIVE DIRECTOR &
	F. CLIFTON SMITH	SECRETARY
		TREASURER

Mailing Address

1331 PENNSYLVANIA AVE. NW SUITE 350S

WASHINGTON, DC 20004

52 1367059

Secretary's Telephone Number

Tax Identification Number

Type of Business

Bank Reference

SUPERCEEDS OLD CARD

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

PBD 204 (10/83)

NAT'L ENDOWMENT FOR

ACCOUNT NAME

THE PRESERVATION OF LIBERTY

ACCOUNT NUMBER

02002736

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

	CARL CHANNELL	PRESIDENT
	F. CLIFTON SMITH	CONSULTANT / Pres. Dir.
	DANIEL LYNN CONRAD	EX. DIRECTOR

Mailing Address

305-4th Street, NE

Suite 1000

Washington, D.C.

20002

Secretary's Telephone Number

543-6300 12/4/85

Tax Identification Number

52-1367059

Type of Business

Bank Reference

SUPERCEEDS OLD CARD

Account Officer

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

PBD 204 (10/83)

91040322115

National Endowment for the Preservation of Liberty

ACCOUNT NAME

ACCOUNT NUMBER 02002736

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

Carl R. Chamell Carl R. Chamell President

1334 PENNSYLVANIA AVE.,
N.W.

SUITE 350- SOUTH
WASHINGTON, D.C. 20004

Tax Identification Number

(202) 662-8700 CEO

Type of Business

Bank Reference

Account Officer

7-29-84

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

EXCEEDS OLD CARD

PBD 204 (10/83)

NATIONAL ENDOWMENT FOR THE

ACCOUNT NAME PRESERVATION OF LIBERTY

ACCOUNT NUMBER 02002736

The undersigned hereby agree on behalf of the firm or corporation named above to the conditions printed on the reverse side of this card

Authorized signature(s)

Print Name(s)

Title

Roger Wilkins Roger Wilkins Treasurer

Edward J. Donahue III Edward J. Donahue III

Anthony Ferraro Anthony Ferraro Treasurer

Mailing Address

305 4th St., N.E., Suite 1000

Washington, D.C. 20002

Secretary's Telephone Number

Tax Identification Number

202/543-6300

Type of Business

Bank Reference

Account Officer

SAH

The Palmer National Bank

Date Opened

Approved By

Initial Deposit

3/19/84

trm

\$2.00
PBD 204 (10/83)

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C NATIONAL ENDOWMENT FOR THE
 PRESERVATION OF LIBERTY
 SUITE 1000
 305 - 4TH STREET, NE
 WASHINGTON, DC

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20002

TAX ID NUMBER: 521-36 7059 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAN	DEPOSIT	
PREVIOUS STATEMENT BALANCE	111,095.83	AS OF 10/31/85
7 CREDITS TOTALING	213,485.00	
✓ 87 DEBITS TOTALING	136,199.60	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	188,381.23	
AVERAGE CYCLE BALANCE	205,602.31	
AVERAGE COLLECTED BALANCE	171,998.97	

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
11/01	62,000.00	REGULAR DEPOSIT
11/04	33,600.00	REGULAR DEPOSIT
11/07	14,500.00	REGULAR DEPOSIT
11/13	14,000.00	REGULAR DEPOSIT
11/15	29,550.00	REGULAR DEPOSIT
11/20	49,625.00	REGULAR DEPOSIT
11/25	10,210.00	REGULAR DEPOSIT

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CHECKS.....					
DATE...CK NO.....	AMOUNT	DATE...CK NO.....	AMOUNT		
11/15 1422	245.90	11/04 * 1424	357.37		
11/04 * 1426	190.00	11/06 1427	10,000.00		
11/06 1428	640.00	11/12 * 1431	4,500.00		
11/12 1432	1,094.90	11/18 1433	74.95		
11/15 1434	2,968.39	11/18 1435	5,000.00		
11/14 1436	305.00	11/14 1437	79.50		
11/12 1438	190.00	11/18 1439	71.72		
11/20 1440	171.00	11/14 * 1442	300.00		
11/13 1443	100.00	11/21 1444	62.00		
11/18 1445	190.00	11/19 1446	78.00		
11/20 1447	90.00	11/19 1448	9,000.00		
11/19 1449	1,788.39	11/20 1450	5,000.00		
11/25 1451	25,000.00	11/21 1452	762.69		
11/25 1453	27.70	11/27 1454	14.40		
11/21 1455	12.47	11/21 1456	69.19		
11/21 1457	1,227.77	11/25 1458	4,275.00		
11/27 1459	2,772.00	11/27 1460	269.00		
11/27 1461	200.00	11/26 1462	190.00		
11/26 1463	466.38	11/26 1464	3,292.67		
11/25 1465	149.25	11/25 1466	25.00		
11/30 1467	25.00	11/22 1468	328.70		
11/26 1469	900.24	11/30 * 1471	10.50		
11/25 1472	313.98	11/25 1473	301.25		
11/27 1474	9,697.48	11/25 1475	276.40		
11/22 1476	227.20	11/22 1477	456.90		
11/25 1478	359.98	11/25 1479	2,976.40		
11/22 1480	243.80	11/25 1481	1,000.00		
11/22 1482	3,747.76	11/22 1483	406.81		
11/27 1484	73.00	11/26 1485	624.50		
11/25 1486	14.00	11/25 1487	14.00		
11/20 1488	200.00	11/27 1489	265.00		
11/26 1490	2,800.00	11/30 1491	1,599.87		
11/25 * 1495	500.00	11/30 * 1502	3,000.00		

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11/30/85

C NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY
SUITE 1000
305 - 4TH STREET, NE
WASHINGTON, DC

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20002

TAX ID NUMBER: 521-36-7059 - PLEASE VERIFY FOR ACCURACY

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
11/01	171,703.63	11/13	201,067.39	11/21	251,455.90
11/04	197,557.20	11/14	199,388.37	11/22	246,044.73
11/05	195,605.04	11/15	220,724.08	11/25	217,271.77
11/06	180,303.51	11/18	220,387.41	11/26	206,497.98
11/07	192,952.29	11/19	209,511.02	11/27	193,207.10
11/12	187,167.39	11/20	233,675.02	11/30	188,381.23

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12/31/85

C NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY
SUITE 1000
305 - 4TH STREET, NE
WASHINGTON, DC

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20002

TAX ID NUMBER: 521-36-7159 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE	188,381.23	AS OF 11/30/85
5 CREDITS TOTALING	461,539.00	
✓ 85 DEBITS TOTALING	568,472.19	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	81,448.04
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AVERAGE CYCLE BALANCE	182,403.36
AVERAGE COLLECTED BALANCE	93,766.94

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
12/02	21,000.00	REGULAR DEPOSIT
12/05	400,000.00	REGULAR DEPOSIT
12/11	21,000.00	REGULAR DEPOSIT
12/18	18,414.00	REGULAR DEPOSIT
12/19	1,125.00	REGULAR DEPOSIT

OTHER DEBITS.....9.1.0.4.0.8.2.2.1.2.1.....

DATE	AMOUNT	DESCRIPTION
12/09	39.42	PRINTED CHECK CHARGE
12/19	100.00	MISCELLANEOUS DEBIT

CHECKS.....

DATE...	CK NO.....	AMOUNT	DATE...	CK NO.....	AMOUNT
12/11		190.00	12/11	1492	1,480.80
12/16	1493	335.00	12/03 *	1496	430.85
12/04	1497	1,000.00	12/04	1498	1,189.00
12/05	1499	1,674.15	12/06	1500	1,880.30
12/10	1501	200.20	12/10 *	1504	16.35
12/10	1505	14,000.00	12/04	1506	5,700.00
12/05	1507	50.00	12/10	1508	8,200.00
12/05	1509	1,000.00	12/06	1510	7,000.00
12/04	1511	100.00	12/09	1512	400,000.00
12/12	1513	1,000.00	12/09	1514	204.48
12/10 *	1516	150.00	12/16	1517	150.00

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12/31/85

C NATIONAL ENDOWMENT FOR THE
 PRESERVATION OF LIBERTY
 SUITE 1000
 305 - 4TH STREET, NE
 WASHINGTON, DC

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20002

TAX ID NUMBER: 521-36-059 - PLEASE VERIFY FOR ACCURACY

CHECKS.....					
DATE...	CK NO.....	AMOUNT	DATE...	CK NO.....	AMOUNT
12/18	1518	7.50	12/12	1519	102.00
12/13	1520	3.00	12/09	1521	185.43
12/09	1522	199.92	12/09	1523	218.49
12/09	1524	134.91	12/17 *	1526	29,826.55
12/09	1527	110.00	12/10	1528	25,000.00
12/16	1529	60.40	12/16	1530	767.14
12/11	1531	301.25	12/13	1532	292.29
12/12 *	1534	104.61	12/10	1535	182.08
12/11	1536	1,257.65	12/11	1537	1,491.75
12/16	1538	96.00	12/10	1539	72.08
12/11	1540	341.00	12/10	1541	104.82
12/11 *	1543	2,772.00	12/11	1544	272.96
12/16	1545	361.70	12/10	1546	23.85
12/18	1547	913.82	12/12	1548	60.00
12/11 *	1551	36.90	12/11	1552	1,281.50
12/10 *	1554	13.00	12/16	1555	3,217.50
12/11	1556	5,000.00	12/12	1557	327.92
12/10	1558	59.57	12/16	1559	132.25
12/20	1560	5,314.01	12/17	1561	84.80
			12/10	1562	2,300.00

12/16	1562	19237.25	0	12/12	1563	3,700.00
12/12	1564	800.00		12/26	1565	103.60
12/13	1566	21.39		12/11	1567	400.00
12/11	1568	500.00		12/13	1569	362.25
12/17	1570	190.00		12/17	1571	20,000.00
12/18	1572	2,000.00		12/19	1573	1,000.00
12/23	1574	1,000.00		12/23	1575	100.00
12/23 *	1577	100.00		12/23	1578	100.00
12/27	1579	100.00		12/23	1580	100.00
12/30 *	1583	571.50		12/24	1584	190.00
12/26	1585	7,000.00		12/23	1586	1,000.00
12/23	1587	1,000.00				

**** CC TINED ****

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12/31/83

NATIONAL ENDOWMENT FOR THE

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12/31/88

NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY
SUITE 1000
305 - 4TH STREET, NE
WASHINGTON, DC

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20002

TAX ID NUMBER: 521-36-7 59 - PLEASE VERIFY FOR ACCURACY

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
12/02	209,381.23	12/11	145,914.52	12/20	92,813.14
12/03	208,950.38	12/12	139,821.99	12/23	89,413.14
12/04	200,961.38	12/13	139,098.06	12/24	89,223.14
12/05	598,237.23	12/16	132,740.82	12/26	82,119.54
12/06	589,356.93	12/17	82,639.47	12/27	82,019.54
12/09	188,264.28	12/18	98,102.15	12/30	81,448.04
12/10	140,242.33	12/19	98,127.15		

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2002736

C NATIONAL ENDOWMENT FOR THE
PRESERVATION OF LIBERTY
SUITE 1000
305 - 4TH STREET, NE
WASHINGTON, DC

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20002

TAX ID NUMBER: 521-36- 059 - PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR DEMAND DEPOSIT

PREVIOUS STATEMENT BALANCE 81,448.04 AS OF 12/31/85

5 CREDITS TOTALING 720,988.00

65 DEBITS TOTALING 782,415.45

SERVICE CHARGE AMOUNT .00

CURRENT STATEMENT BALANCE 20,020.39

AVERAGE CYCLE BALANCE 117,055.98

AVERAGE COLLECTED BALANCE 114,926.95

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
1/02	13,500.00	REGULAR DEPOSIT
1/08	237,497.00	MISCELLANEOUS CREDIT
1/08	399,997.00	MISCELLANEOUS CREDIT
1/27	19,997.00	MISCELLANEOUS CREDIT
1/31	49,997.00	MISCELLANEOUS CREDIT

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OTHER DEBITS.....

DATE	AMOUNT	DESCRIPTION
1/17	5,200.00	MISCELLANEOUS DEBIT
1/28	20,000.00	MISCELLANEOUS DEBIT
1/31	50,000.00	MISCELLANEOUS DEBIT

CHECKS.....

DATE...	CK NO.	AMOUNT	DATE...	CK NO.	AMOUNT
1/03	1542	3,115.80	1/07 *	1574	100.00
1/02 *	1581	100.00	1/06 *	1588	6,000.00
1/02	1589	100.00	1/03	1590	1,599.87
1/03	1591	1,480.80	1/03	1592	1,209.00
1/07	1593	3,500.00	1/06	1594	5,000.00
1/06	1595	48.32	1/06	1596	6,000.00
1/08	1597	190.00	1/22	1598	311.88
1/22	1599	814.00	1/17	1600	6.50
1/13	1601	1,512.75	1/13	1602	1,026.96
1/13	1603	1,130.86	1/14	1604	18.44

*** CONTINUED ***

CHECKS.....9.1.0.4.0.8.2.2.1.2.7.....

DATE...CK NO.....	AMOUNT	DATE...CK NO.....	AMOUNT
1/15 1605	237,500.00	1/09 1606	400,000.00
1/14 1607	276.40	1/22 1608	10.50
1/22 1609	205.00	1/24 1610	292.29
1/17 1611	63.60	1/15 * 1613	2,246.00
1/13 1614	3,000.00	1/17 1618	6,046.00
1/17 1616	326.25	1/23 * 1619	117.55
1/22 1620	12.50	1/23 1621	287.00
1/24 * 1623	707.95	1/27 1624	800.00
1/23 1625	70.00	1/17 1626	47.00
1/21 1627	2,337.03	1/23 1628	242.70
1/17 * 1630	1,117.35	1/21 1631	99.63
1/21 1632	537.79	1/21 1633	4,275.00
1/08 1634	450.00	1/16 1635	200.00
1/15 1636	100.00	1/17 * 1638	1,265.00
1/17 1639	2,605.00	1/16 1640	158.40
1/23 1641	130.95	1/21 1642	3,480.00
1/22 1643	2,682.43	1/17 1644	71.97
1/23 1645	18.54	1/27 1646	1,000.00
1/27 1647	39.00	1/28 1648	190.00
1/30 * 1650	99.64	1/28 1651	500.00
1/31 * 1659	256.00	1/31 * 1661	75.00

DAILY BALANCE SUMMARY.....

DATE.....	BALANCE	DATE.....	BALANCE	DATE.....	BALANCE
1/02	94,748.04	1/14	296,882.64	1/24	22,986.03
1/03	87,342.57	1/15	56,735.84	1/27	42,144.03
1/06	70,294.25	1/16	56,377.44	1/28	21,454.03
1/07	66,694.25	1/17	39,408.77	1/29	20,454.03
1/08	703,548.25	1/21	28,909.32	1/30	20,354.39
1/09	303,548.25	1/22	24,492.76	1/31	20,020.39
1/13	296,877.68	1/23	23,986.27		

RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 APR 24 PM 12: 25

OGC 2556

Lane & Associates
Public Relations

G. DAVID LANE
President

4/21

Sandra,

Per your request, enclosed is
answers to questions regarding MUR-2837

89 APR 25 PM 1:28

Sincerely,
David Lane

91040322128

① Yes, I Did Make A Contribution TO THE Campaign OF Senator Grassley in December OF 1985. The Check is Dated December 12, 1985 AND WAS GIVEN ^{THE DAY} BEFORE THE Breakfast ON THE 12th or 13th. TO WHOM THE CHECK WAS ACTUALLY HANDER TO I CANNOT REMEMBER.
(Copy of checks front & back)

② I DID ATTEND A Breakfast ON THE Morning OF THE 12th or 13th OF December 1985 IN THE Senate Dining Room in THE Capitol.

IN December OF 1985 I WORKED FOR THE National Endowment OF THE Preservation OF Liberty (NEPL) FOR ONE (1) MONTH. DURING THIS PERIOD I HAD AN INTERIM AGREEMENT WHILE NEGOTIATING A ONE YEAR CONTRACT WITH NEPL TO WORK AS A FUNDRAISER.

THE DAY BEFORE THE December Breakfast MY BOSS, CARL CHANNELL, ASKED ME TO ATTEND A Breakfast WITH Senator Grassley. I TOLD ~~them~~ ^{HIM} I WOULD BE AT THE Breakfast AND THEN WAS TOLD I NEEDED TO WRITE A CHECK TO Grassley FOR \$6 OF \$1,000 AND ALSO MY WIFE NEEDED TO GIVE \$1,000. MY RESPONSE WAS I COULDN'T ATTEND BECAUSE OF LACK OF PERSONAL FUNDS AND I WAS TOLD IT WOULD BE MADE UP TO ME. SUBSEQUENTLY, I ATTENDED THE Breakfast WHICH WAS UNEVENTFUL ... I HAVE NO RECOLLECTION OF ANY SERIOUS TOPIC ... PLUS I WAS 30 MINUTES LATE FOR A 45 minute TO 1 HOUR Breakfast.

9 1 0 4 0 3 2 2 1 3 0
③ Yes, Mr. Channell asked me to the Breakfast and told me to write the checks to Grassley for \$6'. In December of 1985 I worked (1) one month for NEPL. During this period I was negotiating a one year contract to work as a fundraiser for NEPL. I did not work with NEPL except for this period because I couldn't work out the details of the contract.

The day before the December Breakfast my boss, Carl Channell, invited me to Breakfast with Senator Grassley the next morning. I accepted and then was asked to write a \$1,000 check along with a \$1,000 check from my wife, Cynthia Lane. I declined saying I didn't have the money... Mr. Channell said to go to the breakfast and it (the money) would be made up to me. I wrote a check ~~for \$1,000~~ and attended the breakfast. This conversation was held at NEPL's Headquarters at 305 4th St. NE, Washington, DC, 20002, the day before the breakfast.

④ I told Mr. Channell I was unable to attend the breakfast because of no money. He told me to attend and it (the money) would be made up to me. This conversation happened at NEPL's Headquarters 305 4th St. NE, Washington, DC 20002.

⑤ Yes, Mr. Channell said that the \$2,000, which I

21040823131
DID NOT HAVE IN MY BANK ACCOUNT, WOULD BE MADE UP TO ME. THIS CONVERSATION HAPPENED AT NEPL'S HEADQUARTERS AT 305 4TH ST. NE, WASHINGTON, DC, 20002.

(6)

I WAS PAID \$2,000 FOR FUNDRAISING SERVICES THAT I HAD RENDERED TO NEPL PRIOR TO THE BREAKFAST. I BELIEVE THE CPA OR ACCOUNTANT OF NEPL GAVE ME THE CHECK ON DECEMBER 17, 1985 IN NEPL'S HEADQUARTERS, 305 4TH ST. NE, WASHINGTON, DC 20002. A \$2,000 CHECK FROM NEPL WAS PAID TO ME. MY BANK WAS 1ST VIRGINIA BANK, ACCT # 4827 6014.

(7)

IN NOVEMBER OF 1985 I WAS OFFERED A JOB FROM NEPL AS A FUNDRAISER, ON THE CONDITION I SIGN A ONE YEAR CONTRACT. I STARTED WORKING FOR NEPL IN DECEMBER OF 1985 UNDER AN INTERIM AGREEMENT WHILE NEGOTIATING THE ONE YEAR CONTRACT... DURING DECEMBER I ATTENDED MANY MEETINGS AT NEPL'S REQUEST PLUS MADE FUNDRAISING CALLS. AT THE END OF DECEMBER IT BECAME APPARENT I WAS GOING TO BE UNABLE TO NEGOTIATE A SUITABLE CONTRACT SO I ENDED THE INTERIM AGREEMENT AND MOVED ON TO OTHER INTEREST.

4 0 1002 N. SYCAMORE PH. 703-534-0038 FALLS CHURCH, VA. 22046

G. DAVID LANE 8-85
CYNTHIA LANE 2
511

12/12 1985 05 05 99999999

PAY TO THE ORDER OF Cash \$ 1,000

ONE THOUSAND DOLLARS & NO/100

FIRST VIRGINIA BANK
SERVING NORTHERN VIRGINIA
FALLS CHURCH, VIRGINIA 22046

MEMO

⑆056001118⑆ 4827 6014⑈ 051⑈ ⑈00001000000⑈

4 0 1002 N. SYCAMORE PH. 703-534-0038 FALLS CHURCH, VA. 22046

G. DAVID LANE 8-85
CYNTHIA LANE
509

Dec. 13, 1985 05 05 99999999

PAY TO THE ORDER OF Cash \$ 1,000.00

ONE THOUSAND AND 0/100

FIRST VIRGINIA BANK
SERVING NORTHERN VIRGINIA
FALLS CHURCH, VIRGINIA 22046

MEMO

⑆056001118⑆ 4827 6014⑈ 0509⑈ ⑈00001000000⑈

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FI - DES
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003 122585

PAID
DE 85 30
FIRST VIRGINIA BANK
NORTHERN REGION
OPERATIONS

7-27 PAY ANY BANK P.E.G.
F.R.B. BALTIMORE MD 052000278
12-30-85 004 05 0592 505571499
MOINES 33-17 P.E.G.
PAY ANY BANK OR TR
0071303354 260103581

7-27 PAY ANY BANK P.E.G.
F.R.B. BALTIMORE MD 052000278
12-30-85 004 05 0592 505571499

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GRASSLEWICK STATE BANK
WEST DEPT 210 65

7-27 PAY ANY BANK P.E.G.
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OPERATIONS

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FOR POST ONLY
STATE BANK
7 1 5 1 6 5 1

Re: MUR 2837

- 1) Yes, Dec. 13, 1985 I wrote a check to Senator Grassley's re-election campaign and presented it to my husband.
- 2) No I did not.
- 3) No, He did not.
- 4) No, I did not
- 5) No, He did not.
- 6) No I was not. My husband handles all financial matters.
- 7) No, I was not.

Cynthia Lane

910403122134



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 1, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Tom Synhorst
1540 High Street
Des Moines, Iowa 50309

RE: MUR 2837

Dear Mr. Synhorst:

By letter dated March 22, 1989, you were issued interrogatories and a request for production of documents from the Federal Election Commission, in connection with an investigation it is conducting. The interrogatories and request for documents were issued by the Commission pursuant to its statutory duty to enforce the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. As noted in that letter, the Commission does not consider you a respondent in this matter, but rather a witness only.

According to the certified mail return receipt, the interrogatories and request for documents were delivered to you on April 8, 1989. You were required to submit the information requested within 15 days of receipt of the letter. On April 20, 1989, you talked with staff of this Office via telephone. At that time you stated that you would be able to submit the requested information. To date we have not received your response. Unless we receive a response from you within five days of your receipt of this letter, this Office will request that the Commission issue an order to submit written answers and a subpoena to produce documents.

Should you have any questions, please contact Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

91040322135



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 2, 1989

Carl R. Channell
2032 Belmont Road, N.W. #210
Washington, D.C. 20009

RE: MUR 2837
Carl R. Channell,
National Endowment for the
Preservation of Liberty,
and Channell Corporation

Dear Mr. Channell:

A certified letter, dated March 22, 1989, was mailed to you from the Federal Election Commission that required your signature on the return receipt. To date we have not received the signed receipt. In the event that there is some difficulty with your receiving certified mail, and to avoid any further delay in processing the above referenced matter, a copy of the March 22, 1989, letter and its enclosures are attached and mailed via regular mail delivery.

As the enclosed letter states, on March 14, 1989, the Commission found reason to believe certain violations of the Federal Election Campaign Act, of 1971, had been committed by the National Endowment for the Preservation of Liberty, Channell Corporation, and you, as an officer or director of these named corporations. A Subpoena to Produce Documents and Order to Submit Written Answers were issued with that letter. You are required to submit responses to the subpoena and order within 15 days of your receipt of this letter. This Office will request the Commission to authorize the enforcement of the subpoena and order in the United States District Court, if your responses are not received within the requisite time.

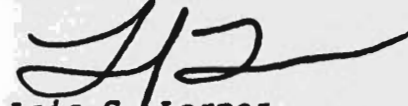
91040322136

Carl R. Channell
Page 2

If you have any questions, please contact Sandra
H. Robinson, the attorney assigned to this matter, at (202)
376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosures

91040322137

06C 3278
RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION

89 JUN 30 AM 9: 37

Thomas J. Synhorst
1540 High St.
Des Moines, IA 50309

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E. St., N.W.
Washington, D.C. 20463

Dear Mr. Noble:

In response your letter re: MUR 2837 I have enclosed the following responses.

Sincerely,


Thomas J. Synhorst

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
89 JUN 30 AM 11: 33

21040322138

1. I arranged for Carl Channell and nine of his associates to have breakfast with Senator Charles Grassley in Room S-110 of the Capitol on Friday morning, December 13, 1985. A few weeks prior to the meeting-I had discussed with Mr. Channell the possibility of his raising money for the Grassley for Senate campaign. He agreed and on that morning, following the breakfast, Channell gave me an envelope containing 10-\$1,000 checks for the Grassley campaign. However, the breakfast was not arranged for the express purpose of raising campaign funds.

2. I asked Carl Channell to help raise campaign funds for The Grassley Campaign, but to my best recollection never requested a specific amount.

3. To the best of my recollection I did not tell Carl Channell that persons attending the breakfast should make a contribution in any amount.

4. Carl Channel delivered to me contributions totaling 10,000 on December 13, 1985, following the breakfast.

5. To the best of my recollection did I know that any person who made a contribution asked to be reimbursed.

6. I was the Grassley for Senate Campaign Manager and was reimbursed for all campaign related expenses.

91040822139

Part VI

Mur 283

000 3540

Postal Customer:

In response to your inquiry regarding the article described below, the following information is furnished:

OFFICIAL ELECTION COMMISSION

☐ The article was received by the addressee.☒ We were unable to locate the article. If later found, you will be advised. This information has been referred to the Inspection Service for review and if additional information is needed, you will be contacted.☐ We did not locate the article and the addressee failed to reply to our inquiry. You may wish to contact the addressee, requesting cooperation in this matter.

Date of Reply

JUL 13 1989

Office

CLAIMS & INQUIRY SECTION

WASHINGTON, D.C. 20519

Postmaster

Ginda L. [unclear]

PS Form 1510, January 1989

Do Not Detach

Part II-C

6-20-89

U.S. Postal Service

MAIL LOSS/RIFLING REPORT

1. Complaint Date		2. Office Accepting Complaint (City and State)			3. Complaint ☐ Loss ☐ Rifling	
4. Article Was Mailed By				5. Article Was Addressed To		
a. Name James [unclear]				a. Name CARL R. CHAMBERLAIN		
b. Return Address As On Article Mailed				b. Address As On Article Mailed		
c. City WASH D.C.				c. City WASH D.C.		d. State D.C.
e. ZIP+4 20519				e. ZIP+4 20519		
f. Day Telephone Number (Include Area Code) 37 [unclear]				f. Day Telephone Number (Include Area Code) [unclear]		
6. Article Was Mailed				7. Article Was Sent		8. Type of Mail
a. Date		b. Time ☐ AM ☐ PM		☒ 1st-Class ☐ Parcel Post		☐ Letter ☐ Parcel
Month 3	Day 2	Year 88		(Hour) ☐ PM ☐ Other (Specify)		☐ Other (Specify)
9. Special Services ☐ Special Handling ☐ Special Delivery ☒ Certified ☐ Return Receipt for Merchandise						
10. Place of Mailing ☒ Main Post Office ☐ Station or Branch ☐ Contract Station ☐ Collection Box ☐ Residence or Business				Name And/Or Address of Location Checked [unclear] City And State of Location Checked WASH D.C. ZIP+4 For Location Checked 20519		
11. Contents Of Article (Describe in detail, size, color, brand name, serial no., check no., and amount, etc.) [unclear]						12. Value \$

PS form 1510, January 1989

SEND TO REGIONAL CHIEF INSPECTOR

MAY 30 1989

89 AUG 24 AM 11:06

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

Carl R. Channell, National Endowment for
the Preservation of Liberty, and Channell
Corporation

MUR 2837

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 14, 1989, the Federal Election Commission ("Commission") found reason to believe that Carl R. Channell, the National Endowment for the Preservation of Liberty ("NEPL"), and the Channell Corporation violated 2 U.S.C. § 441b(a); and reason to believe these respondents violated 2 U.S.C. § 441f.¹ See First General Counsel's Report signed March 1, 1989. The Commission's findings were based on a referral from the Department of Justice Election Crimes Branch that included information related to the possible making of corporate contributions to the 1986 federal campaign of Senator Charles Grassley.² It was further alleged in the referral information that the alleged corporate contributions were made in the names

1. On that same date, the Commission found reason to believe Glen David Lane and Cynthia Lane, husband and wife, violated 2 U.S.C. § 441f, by participating in the reimbursement scheme at issue in this matter. The Lanes have responded to the interrogatories and requests for documents propounded to them in the investigation of this matter. The Palmer National Bank has also responded to the subpoena and order propounded to it as a nonrespondent witness in this matter, and Tom Synhorst has responded to the interrogatories and request for documents propounded to him as a nonrespondent witness. These responses will be discussed in a later report to the Commission.

2. Senator Grassley was a candidate for re-election to the U.S. Senate from the State of Iowa in 1986. His principal campaign committee for that year was the Grassley Committee, Inc.

91040322141

of certain other individuals. The circumstances described in the referral information indicated that corporate funds were used in an alleged reimbursement scheme connected with these contributions.

On March 14, 1989, the Commission also approved a subpoena and order to Mr. Channell, NEPL, and the Channell Corporation. The notification of the Commission's finding and the subpoena and order were mailed via certified, return receipt mail to Mr. Channell on March 22, 1989.³ By May 30, 1989, the return receipt had not been received in this Office, nor had a response been received from Mr. Channell. Therefore, on that date, staff of this Office contacted the Commission's mailroom and requested that a tracer be placed on the certified mail with the U.S. Post Office to determine whether the the notification had been delivered to Mr. Channell. In addition, a notification letter was sent via regular mail to Mr. Channell on June 2, 1989. That mailing included copies of the original letter, and the subpoena and order. Attachment I. The June 2nd letter has not been returned to the Commission as undeliverable. However, this Office has not received a response from Mr. Channell with regard to this matter. On July 25, 1989, this Office received a notice from the U.S. Postal Service. Attachment II. The notice indicates that the Post Office was unable to locate the letter in question and that the information would be referred to the Postal Inspection Service for review.

3. This notification included NEPL and the Channell Corporation, since Mr. Channell is an officer in these organizations.

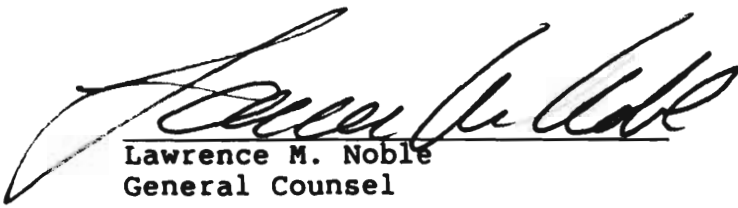
91040322142

Section 111.13 of Commission regulations require the delivery of a notification, subpoena, and order upon a named person by delivering of a copy to such person in the following manner. When delivery is to be made to a natural person, it may be done by handing a copy to the person, or leaving a copy at his or her office with a person in charge thereof, by leaving a copy at his or her dwelling place or usual place of abode with someone of suitable age and discretion, or by mailing a copy by registered or certified mail to his or her last known address, or by any other method whereby actual notice is given. When delivery is to be made upon a person who is not a natural person, it can be accomplished by mailing a copy by certified or registered mail to the place of business or by handing a copy to a registered agent, or any officer, director, or agent in charge of any office of such person, or by mailing a copy by registered or certified mail to such representative at his or her last known address, or by any other method whereby actual notice is given.

Due to the above circumstances, this Office will employ the services of a private process server in order to insure compliance with 11 C.F.R. § 111.13.

Date

8/23/89


Lawrence M. Noble
General Counsel

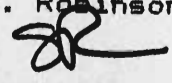
Attachments

1. Letter to Respondents mailed June 2, 1989
2. Notice from U.S. Postal Service

Staff Assigned: Sandra H. Robinson

91040323143

INTEROFFICE MEMORANDUM

Date: 01-Sep-1989 01:23pm GMT
From: Sandra H. Robinson
SANDRAR 
Dept: FEC/OGC
Tel No: (202) 376-8200

TO: MUR 2837 FILE

(PAPER MAIL)

CC: GEORGE F. RISHEL

(GEORGER)

Subject: Service of Process

Attached are copies of a receipt and documents picked-up by Marshal's Metro Service on this date at 12:15 p.m. Marshal's will personally serve these documents to Carl R. Channell. Mr. Channell has not responded to these documents, which were previously sent to him through the postal service.

91040322144



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 1, 1989

RECEIPT

VENDOR: Marshal's Metro Service
1205 Bell Haven Road
Alexandria, Virginia 22307

Tel. No.: 765-4900

SERVICE REQUESTED: Serve the attached letters (2) and their respective enclosures to Carl R. Channell, at 2032 Belmont Road, N.W., #210, Washington, D.C. 20009.

These documents were picked-up at the Federal Election Commission, Office of the General Counsel, on September 1, 1989, for service.



Marshal's Metro Service

21040322145



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

March 22, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Carl R. Channell
2032 Belmont Road, N.W., #210
Washington, D.C. 20009

RE: MUR 2837
Carl R. Channell, National
Endowment for the
Preservation of Liberty and
Channell Corporation

Dear Mr. Channell:

On March 14, 1989, the Federal Election Commission found that there is reason to believe the National Endowment for the Preservation of Liberty ("NEPL"), Channell Corporation and you, as an officer or director of these named corporations, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On that same date, the Commission found reason to believe NEPL, Channell Corporation, and you violated 2 U.S.C. § 441f. The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against NEPL, Channell Corporation and you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Statements should be submitted under oath. All responses to the enclosed Subpoena to Produce Documents and Order to Submit Written Answers must be submitted within 15 days of your receipt of this subpoena and order. Any additional materials or statements you wish to submit should accompany the response to the subpoena and order.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. If you intend to be represented by counsel, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications or other communications from the Commission.

21040322146

Carl R. Channell
Page 2

In the absence of any additional information which demonstrates that no further action should be taken against NEPL, Channell Corporation and you, the Commission may find probable cause to believe that violations have occurred and proceed with conciliation.

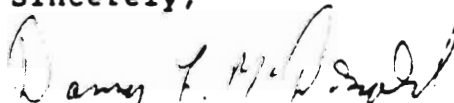
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending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

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 the General Counsel ordinarily will not 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 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 Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Subpoena and Order
Procedures
Designation of Counsel Form

21040022147



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 9, 1989

HAND DELIVERED

Carl R. Channell
2032 Belmont Road, N.W., #608
Washington, D.C. 20009

RE: MUR 2837
MUR 2406

Dear Mr. Channell:

The Federal Election Commission's Office of the General Counsel has made several attempts to notify you of official action taken by the Commission with regard to the above referenced matters. To date, these efforts have been unsuccessful. We are now informed that your address has changed, in that you have moved to another apartment within the same building. Although it is expected that mail addressed to you at the same building, but a different apartment, would be forwarded to you at the new apartment, it is conceivable that this did not occur. Therefore, enclosed, please find copies of letters of notification and other documents relevant to the Commission's investigation of the above referenced matters.

This Office notes your objection to being named as a respondent in these matters, however, before either can be resolved, answers to certain outstanding questions must be received. We are hopeful that each matter can be resolved expeditiously.

You should notify this Office immediately upon receipt of this letter. If you have any questions, contact Sandra H. Robinson, the attorney assigned to these matters, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosures

91040322148



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 13, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carl R. Channell
2032 Belmont Road, N.W., #608
Washington, D.C. 20009

RE: MUR 2837
MUR 2406

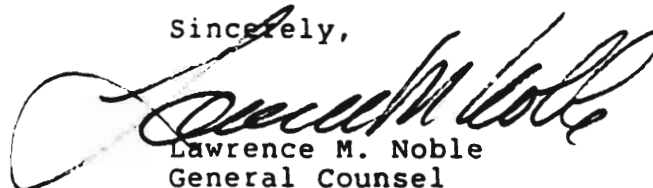
Dear Mr. Channell:

The Federal Election Commission's Office of the General Counsel has made several attempts to notify you of official action taken by the Commission with regard to the above referenced matters. To date, these efforts have been unsuccessful. We are now informed that your address has changed, in that you have moved to another apartment within the same building. Although it is expected that mail addressed to you at the same building, but a different apartment, would be forwarded to you at the new apartment, it is conceivable that this did not occur. Therefore, enclosed, please find copies of letters of notification and other documents relevant to the Commission's investigation of the above referenced matters.

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You should notify this Office immediately upon receipt of this letter. If you have any questions, contact Sandra H. Robinson, the attorney assigned to these matters, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosures

21040322142



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 13, 1989

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Carl R. Channell
2032 Belmont Road, N.W., #608
Washington, D.C. 20009

RE: MUR 2837
MUR 2406

Dear Mr. Channell:

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This Office notes your objection to being named as a respondent in these matters, however, before either can be resolved, answers to certain outstanding questions must be received. We are hopeful that each matter can be resolved expeditiously.

You should notify this Office immediately upon receipt of this letter. If you have any questions, contact Sandra H. Robinson, the attorney assigned to these matters, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosures

21040322150



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 22, 1989

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Carl R. Channell
2032 Belmont Road, N.W., #210
Washington, D.C. 20009

RE: MUR 2837
Carl R. Channell, National
Endowment for the
Preservation of Liberty and
Channell Corporation

Dear Mr. Channell:

On March 14, 1989, the Federal Election Commission found that there is reason to believe the National Endowment for the Preservation of Liberty ("NEPL"), Channell Corporation and you, as an officer or director of these named corporations, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On that same date, the Commission found reason to believe NEPL, Channell Corporation, and you violated 2 U.S.C. § 441f. The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against NEPL, Channell Corporation and you. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Statements should be submitted under oath. All responses to the enclosed Subpoena to Produce Documents and Order to Submit Written Answers must be submitted within 15 days of your receipt of this subpoena and order. Any additional materials or statements you wish to submit should accompany the response to the subpoena and order.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. If you intend to be represented by counsel, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications or other communications from the Commission.

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Carl R. Channell
Page 2

In the absence of any additional information which demonstrates that no further action should be taken against NEPL, Channell Corporation and you, the Commission may find probable cause to believe that violations have occurred and proceed with conciliation.

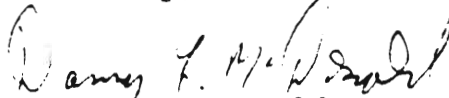
If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(D). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending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

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 the General Counsel ordinarily will not 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 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 Sandra H. Robinson, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Subpoena and Order
Procedures
Designation of Counsel Form

21040322152

**FEDERAL ELECTION COMMISSION
FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS: Carl Russell Channell
National Endowment for the
Preservation of Liberty
Channell Corporation

MUR 2837

31040322153
The Federal Election Campaign Act of 1971, as amended ("the Act") prohibits any corporation from making a contribution or expenditure in connection with any federal election. The Act further prohibits any officer or any director of any corporation from consenting to such contribution or expenditure by the corporation. A candidate and political committee are prohibited from accepting or receiving any corporate contribution. 2 U.S.C. § 441b(a).

The Act further provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. See also, 11 C.F.R. § 110.4(b). The Act defines the term "person" to include a corporation. 2 U.S.C. § 431(11). This prohibition includes a corporation's repayment, reimbursement, or other compensation to any person for his or her contribution to any federal candidate or political committee. See Advisory Opinion 1986-41. The Commission has also determined that persons or entities that assist in the making of a contribution in the name of another may be found in violation of Section 441f.

Senator Charles Grassley was a candidate for re-election to

the U.S. Senate from the State of Iowa in 1986. His principal campaign committee for that election was the Grassley Committee, Inc. According to information ascertained in the normal course of the Commission's supervisory responsibilities, in early December 1985, Carl Russell Channell organized a fundraising breakfast on behalf of the 1986 re-election campaign of Senator Grassley. Channell apparently solicited \$1,000 contributions from several associates and acquaintances with respect to this fundraiser. The breakfast was held on or about December 12 or 13, apparently on Capitol Hill in the Senate dining room. Those present at the breakfast included Senator Grassley, his aide, Tom Synhorst; Carl Russell Channell, and Channell's associates, Glenn David Lane, Daniel Conrad, and Richard Miller. No contributions were apparently delivered to Senator Grassley at this breakfast.

Subsequent to the breakfast, however, 10 contributions of \$1,000 each were made and delivered to the Grassley Committee. These contributions, each for \$1,000, were from: Carl Russell Channell, Daniel Conrad, Francis Gomez, Esperanza Gomez, Glenn David Lane, Cynthia Lane, Richard Miller, Joy Miller, Eric Jon Olson, and F. Clifton Smith. The Grassley Committee reported the receipt of all of these contributions on December 24, 1985. All of them are reported as made with respect to the 1986 primary election.

Glenn David Lane was a fundraising consultant who worked for one of Channell's organizations in December 1985 and January 1986. At that time the active Channell organizations

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included two corporations, the National Endowment for the Preservation of Liberty and the Channell Corporation. Mr. Lane has stated that he told Mr. Channell that he was financially unable to contribute to the Grassley campaign at the time of the request for a contribution. He stated further that Mr. Channell told him that he (Lane) would be reimbursed. A reimbursement of \$2,000 for Glenn David Lane's and Cynthia Lane's contributions was made. Channell described these payments as a "business expense reimbursement." The reimbursement was reportedly included in a check which paid Mr. Lane for his consulting services, apparently drawn on the account of one of the corporations operational at that time .

Therefore, there is reason to believe the National Endowment for the Preservation of Liberty, the Channell Corporation and Carl Russell Channell, as an officer or director of these corporations, violated 2 U.S.C. § 441b(a). There is also reason to believe the National Endowment for the Preservation of Liberty, the Channell Corporation, and Carl Russell Channell violated 2 U.S.C. § 441f.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2837
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Carl R. Channell
2032 Belmont Road, N.W., #210
Washington, D.C. 20009

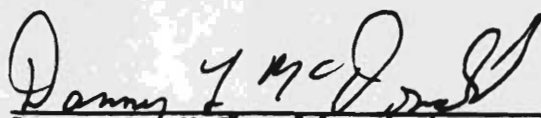
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

21040322156

Carl R. Channell
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this 20 , day
of *March*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:


for Marjorie W. Emmons
Secretary to the Commission

Attachments
Document Request and Questions (4 pages)

91040322157

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from November 1, 1985 to January 31, 1986.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

31040322158

DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

21040322159

**INTERROGATORIES
AND REQUEST FOR DOCUMENTS**

1. State whether you organized, sponsored, or arranged for a fundraising event on behalf of Senator Charles Grassley's 1986 re-election campaign. If so, state the date and place of this event, who attended it, with whom you arranged or coordinated this event with respect to Senator Grassley's campaign, and, if expenses were incurred with respect to the event, provide an itemization of such expenses and who paid such expenses.

2. State whether you solicited or requested persons to make contributions to Senator Grassley's 1986 re-election campaign with respect to the fundraising event described in your response to Question 1. If so,

(a) identify all such persons and the amount of all such contributions;

(b) identify all other persons who either attended the fundraising event described in your response to Question 1 or made contributions to Senator Grassley's 1986 re-election campaign with respect to this event and the amount of all such contributions; and

(c) state when all contributions identified in your response to this question were delivered to Senator Grassley or his authorized campaign committee(s) or to any person on behalf of him or his committee(s).

3. State whether any of the persons identified in your response to Question 2 sought or requested, in any manner, reimbursement or compensation from or through you for their contribution to Senator Grassley's 1986 re-election campaign. If so, identify all such persons and, for each one, describe in detail the circumstances regarding their request or seeking reimbursement or compensation.

4. State whether any of the persons identified in your response to Question 2 were reimbursed or compensated, in any manner, by or through you for their contribution to Senator Grassley's 1986 re-election campaign. If so, identify all such persons and, for each one, describe in detail the date, amount, and manner of reimbursement or compensation, including the identity of the banking institution and account number(s) used in making all such reimbursements or compensation.

21040322160

Carl R. Channell
Page 6

5. For the period between November 1, 1985, and January 31, 1986, identify the banking institution(s) and account number(s) for all accounts controlled by you or for which your name was on the signature card, including but not limited to all accounts maintained by the National Endowment for the Preservation of Liberty, the American Conservative Trust, the Channell Corporation, and any other organization controlled by you or for which you had established a banking account.

6. (a) Provide a copy of all checks written on all of the accounts identified in your response to Question 5 for the period between November 1, 1985, and January 31, 1986.

(b) For all checks provided in response to Question 6(a) and made payable to persons identified in your response to Question 2, describe in detail the basis and purpose for all such checks. Provide all invoices and other documents in support of your response to this question.

7. State whether Tom Synhorst, Senator Grassley, or any person representing Senator Grassley's 1986 re-election campaign was made aware, in any manner, that one or more of the persons identified in your response to Questions 3 or 4 had sought or requested reimbursement or compensation or had been reimbursed or compensated for their contributions to Senator Grassley's 1986 re-election campaign. If so, describe in detail what information was provided to Tom Synhorst, Senator Grassley, or any person representing Senator Grassley's 1986 re-election campaign, who provided the information, and the circumstances and manner in which such information was provided. Provide all documents in support of or relating to your response to this question.

21040322161

**DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION**

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of the General Counsel where they are assigned to a staff member.

Following review of the information which generated the matter, a recommendation on how to proceed, based on a preliminary legal and factual analysis, shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act of 1971, as amended (hereinafter "the Act") may have occurred or is about to occur; or (b) that the Commission find no reason to believe that a possible violation of the Act has occurred or is about to occur, and that the Commission close the file in the matter.

Thereafter, if the Commission decides by an affirmative vote of four Commissioners to open a Matter Under Review (MUR) and finds that there is reason to believe that a violation of the Act has been committed or is about to be committed, the Office of the General Counsel shall conduct an investigation into the matter. Within 15 days of notification of the Commission's finding(s), a respondent(s) may submit any factual or legal materials relevant to the allegations. During its investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order written answers to interrogatories. The respondent(s) may be contacted more than once by the Commission during its investigation.

If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of the General Counsel may recommend that the Commission enter into conciliation prior to a finding of probable cause to believe a violation has been committed. Conciliation is an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. Most often, the result of conciliation is an agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

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If the investigation warrants, and no conciliation agreement is entered into prior to a probable cause to believe finding, the General Counsel must notify the respondent(s) of his/her intent to recommend that the Commission proceed to a vote on probable cause to believe that a violation of the Act has been committed or is about to be committed. Included with the notification to the respondent(s) shall be a brief setting forth the position of the General Counsel on the legal and factual issues of the case. Within 15 days of receipt of such brief, the respondent(s) may submit a brief stating their position on the issues. Both briefs will then be filed with the Commission Secretary and will be considered by the Commission. Thereafter, if the Commission determines by an affirmative vote of four Commissioners that there is probable cause to believe that a violation of the Act has been committed, or is about to be committed, conciliation must be undertaken for a period of at least 30 days but not more than 90 days. If the Commission is unable to correct or prevent any violation of the Act through conciliation the Office of the General Counsel may recommend that the Commission file a civil suit against the respondent(s) to enforce the Act. Thereafter, the Commission may, upon an affirmative vote of four Commissioners, institute civil action for relief in the United States District Court.

See 2 U.S.C. § 437g, 11 C.F.R. Part 111.

January 1987

91040322163

STATEMENT OF DESIGNATION OF COUNSEL

NOR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

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.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

91040322164



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 24, 1989

Carl R. Channell, Treasurer
Anti-Terrorism American Committee
Anti-Terrorism American Committee
State Election Fund
2032 Belmont Road, N.W.
Washington, D.C. 20009

RE: MUR 2406
Anti-Terrorism American
Committee and Anti-Terrorism
American Committee State
Election Fund and Carl R.
Channell, as treasurer

Dear Mr. Channell:

On March 27, 1989, you were notified that the Federal Election Commission had found reason to believe the Anti-Terrorism American Committee and Anti-Terrorism American Committee State Election Fund and you, as treasurer, had violated certain provisions of the Federal Election Campaign Act of 1971, as amended, and were sent interrogatories and request for documents.

Because no response has been received to these interrogatories and request for documents, the Commission has issued the attached subpoena and order requiring you to provide the requested information which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

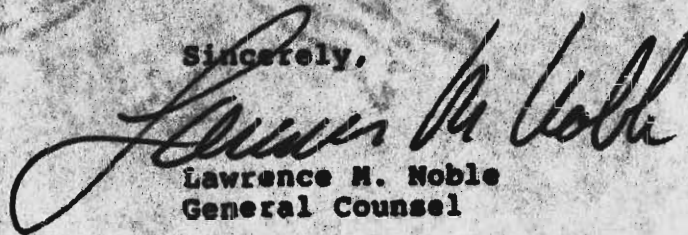
You may consult with an attorney and have an attorney assist you in the preparation of your response to this subpoena and order. It is required that you submit all answers to questions under oath within 15 days of your receipt of this subpoena and order.

91040322165

Carl R. Channell
Page 2

If you have any questions, please contact Sandra
H. Robinson, the attorney assigned to this matter, at (202)
376-8200.

Sincerely,

A handwritten signature in dark ink, appearing to read "Lawrence M. Noble", is written over the typed name and title.

Lawrence M. Noble
General Counsel

Enclosure
Subpoena and Order

91040322166

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 2406
)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

TO: Carl R. Channell, Treasurer
Anti-Terrorism American Committee
Anti-Terrorism American Committee
State Election Fund
2032 Belmont Road, N.W.
Washington, D.C. 20009

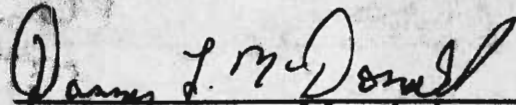
Pursuant to 2 U.S.C. § 437d(a)(1) and (3), and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and subpoenas you to produce the documents requested on the attachment to this Subpoena. Legible copies which, where applicable, show both sides of the documents may be substituted for originals.

Such answers must be submitted under oath and must be forwarded to the Office of the General Counsel, Federal Election Commission, 999 E Street, N.W., Washington, D.C. 20463, along with the requested documents within 15 days of receipt of this Order and Subpoena.

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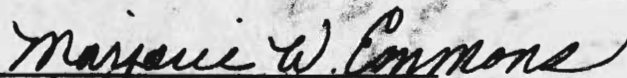
MUR 2406
Anti-Terrorism American
Committee
Page 2

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this *22nd*,
day of *August*, 1989.



Danny L. McDonald, Chairman
Federal Election Commission

ATTEST:



Marjorie W. Emmons
Secretary to the Commission

Attachments
4 pages

91040322168

INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from April 1, 1986 to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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1. The reports filed by the Anti-Terrorism American Committee State Election Fund disclose the following disbursements. For each of these disbursements, describe in detail any relationship the disbursement has with television advertisements aired in connection with the 1986 Maryland Senate election.

<u>Vendor/Payee</u>	<u>Date</u>	<u>Amount</u>
Washington Times	9-9-86	\$5,944.00
	10-9-86	\$3,192.50
Rafael Flores	8-28-86	\$700.00
	9-3-86	\$1,148.04
	9-5-86	\$29.31
	9-15-86	\$297.00
PRAIDS	8-28-86	\$66.00
	9-4-86	\$303.65
RADIO-TV Monitoring Service	9-3-86	\$79.00
Travelworld	9-4-86	\$600.00
	10-2-86	\$180.00
	10-8-86	\$150.00
F. Clifton Smith	9-5-86	\$1550.00
United Virginia Bank VISA	8-19-86	\$1500.00
Cash	8-22-86	\$300.00
ZGS Television Production	10-2-86	\$217.83

2. With respect to the disbursements to the Washington Times noted in Question 1, provide a copy of each advertisement.

3. With respect to the \$66.00 disbursement to PRAIDS noted in Question 1, provide a copy of the press release mailed.

4. With respect to the disbursement to United Virginia Bank for VISA charges noted in Question 1, provide an itinerary and itemization of the charges.

5. With respect to the disbursements to Travelworld noted in Question 1, provide an itinerary and itemization of the charges.

21040322171

MUR 2406
Anti-Terrorism American
Committee
Page 6

6. Describe in detail the consulting services performed by F. Clifton Smith for which the \$1550.00 payment noted in Question 1 was made.

7. Describe in detail the services and expenses for which the payments to Rafael Flores noted in Question 1 were made.

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
Carl R. Channell, National	)	MUR 2837
Endowment for the	)	
Preservation of Liberty, and	)	
the Channell Corporation	)	
	)	
Anti-Terrorism American	)	MUR 2406
Committee and Anti-Terrorism	)	
American Committee State	)	
Election Fund and Carl R.	)	
Channell, as treasurer;	)	
National Endowment for the	)	
Preservation of Liberty;	)	
Sentinel; Carl R. Channell;	)	
American Conservative Trust	)	
and Carl R. Channell, as	)	
treasurer; American	)	
Conservative Trust State	)	
Election Fund	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

A. MUR 2406

The Commission on August 18, 1989, issued a subpoena to Carl R. Channell for the answers and documents to complete its investigation in this matter. No response has been made to this subpoena.

B. MUR 2837

On March 14, 1989, the Commission found reason to believe Channell, NEPL, and the Channell Corporation had violated 2 U.S.C. §§ 441b and 441f in connection with the alleged reimbursements of certain contributions made in December 1985 to the campaign of Senator Charles Grassley of Iowa. The Commission also approved a subpoena to the respondents for information relating to these allegations. No response was made to this

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notification and subpoena.

II. DISCUSSION

On January 29, 1990, Channell filed the 1989 Year End Reports for his two federal political committees, the American Conservative Trust ("ACT") and the Anti-Terrorism American Committee ("ATAC"). Both committees continue to list Channell's personal residence as their address. ACT disclosed no financial activity for 1989 and apparently is continuing to file reports only because it has outstanding debts. ATAC, however, disclosed \$3,000 in receipts with \$1,697.76 cash on hand at the beginning of the year, disbursements of \$3,414.64 with lending cash on hand of \$1,283.12 and debts of \$4,818.14.

This Office had prepared a report recommending the Commission issue new subpoenas to Channell for the information and to authorize the filing of a civil suit if the subpoenas were not complied with within 15 days.

On May 7, 1990, Carl R. Channell died at George Washington University Hospital from injuries he sustained when hit by a car near his office in Southeast Washington.

Channell's death makes further investigation in these matters impossible. Furthermore, without Channell, there is no one left to respond on behalf of or to be held responsible for the alleged violations by his organizations.

The information gathered in this matter, as discussed in previous reports, clearly demonstrated that the National Endowment for the Preservation of Liberty ("NEPL"), Sentinel, the American Conservative Trust, the Anti-Terrorism American

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Committee, and the Channell Corporation functioned as alter egos of Carl R. Channell. See, e.g., General Counsel's Report, signed May 1, 1989. Moreover, since sometime in 1987, these organizations have either ceased to exist or functioned with Channell as the only staff or officer. NEPL and Sentinel have been defunct since 1987. The Channell Corporation reportedly file for bankruptcy in 1987. As noted above, ACT and ATAC continued to file reports with the Commission. ACT, however, was inactive and in debt. ATAC had little activity in 1989 and was also in debt. Channell was the treasurer of both ACT and ATAC. They both were listed at his home address.

Only Channell could have answered the Commission's outstanding questions in MUR 2406 and MUR 2837 or provided any additional information the Commission may have sought. With his death, the investigation cannot proceed beyond the material already obtained, which in itself has been voluminous. Furthermore, as explained in the General Counsel's Report signed May 1, 1989, Channell was the only person who could be held accountable for the alleged violations of these organizations. Without him, there are no staff, no officers, and in fact no organizations.

The investigation and reports to date in MUR 2406 have outlined in considerable detail the scope of the alleged violations, particularly those relating to the advertisements in connection with the 1986 Maryland Senate election. A voluminous record has been produced in MUR 2406. Although some legal issues could be the subject of further Commission deliberation,

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Channell's death has made further deliberation primarily moot or academic. Similarly, the basic facts regarding the reimbursement of contributions to Senator Grassley, the subject of MUR 2837, have also been adequately developed.¹ Therefore, this Office recommends that the Commission close the file in MUR 2406 and close the file as it pertains to Carl R. Channell, the National Endowment for the Preservation of Liberty, and the Channell Corporation in MUR 2837.² We note that the Commission has closed the file with respect to deceased respondents in MURs 2073 and 2583.

III. RECOMMENDATIONS

1. Close the file in MUR 2406.
2. Close the file in MUR 2837 as it pertains to Carl R. Channell, the National Endowment for the Preservation of Liberty, and the Channell Corporation.
3. Send the attached letters.

Date

5/14/90

Lawrence M. Noble
General Counsel

Attachments

1. Obituary
2. Proposed letters

Staff Assigned: Elizabeth Campbell
George F. Rishel

1. Two other respondents in MUR 2837, David and Cynthia Lane, have acknowledged they were reimbursed by Channell for their contributions to Senator Grassley. Their alleged violations will be addressed in briefs.

2. The recommendations do not include a recommendation to take no further action, but only to close the file. A vote to take no further action may be construed by some as a Commission finding.

91040322176



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS *PH*
COMMISSION SECRETARY

DATE: MAY 17, 1990

SUBJECT: MURS 2406 & 2837 - GENERAL COUNSEL'S REPORT
DATED MAY 14, 1990

The above-captioned document was circulated to the
Commission on Tuesday, May 15, 1990 at 11:00 a.m.

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	XXX _____

This matter will be placed on the meeting agenda
for Tuesday, May 22, 1990.

Please notify us who will represent your Division before the
Commission on this matter.

21040322177



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS *DAH*
COMMISSION SECRETARY

DATE: MAY 18, 1990

SUBJECT: MURS 2406 & 2837 - GENERAL COUNSEL'S REPORT
DATED MAY 14, 1990

The above-captioned document was circulated to the
Commission on Tuesday, May 15, 1990 at 11:00 a.m..

Objection(s) have been received from the Commissioner(s)
as indicated by the name(s) checked below:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	<u>XXX</u>
Commissioner McGarry	_____
Commissioner Thomas	<u>XXX</u>

This matter will be placed on the meeting agenda
for Tuesday, May 22, 1990.

Please notify us who will represent your Division before the
Commission on this matter.

21040322178

BEFORE THE FEDERAL ELECTION COMMISSION

21040322179

In the Matter of	)	
	)	
Carl R. Channell, National Endowment for	)	MUR 2837
the Preservation of Liberty, and the	)	
Channell Corporation	)	
	)	
Anti-Terrorism American Committee and	)	MUR 2406
Anti-Terrorism American Committee State	)	
Election Fund and Carl R. Channell, as	)	
treasurer; National Endowment for the	)	
Preservation of Liberty; Sentinel; Carl	)	
R. Channell; American Conservative	)	
Trust and Carl R. Channell, as treasurer	)	
American Conservative Trust State	)	
Election Fund	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on May 22, 1990, do hereby certify that the Commission decided by a vote of 4-2 to take the following actions with respect to the above-captioned matter:

1. Close the file in MUR 2406.
2. Close the file in MUR 2837 as it pertains to Carl R. Channell, the National Endowment for the Preservation of Liberty, and the Channell Corporation.

(continued)

Federal Election Commission
Certification for MUR 2406 and MUR 2837
May 22, 1990

Page 2

3. Send the letters attached to the General Counsel's report dated May 14, 1990.

Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas dissented.

Attest:

May 23 1990
Date

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

91040322180

90 JUN 25 PM 5:08

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Glenn David Lane and
Cynthia Lane

)
)
)
)

MUR 2837

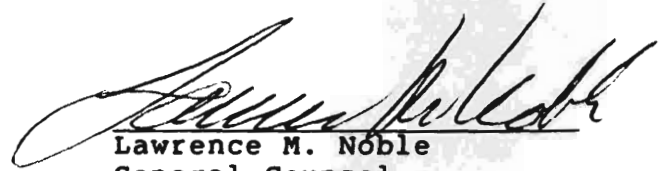
SENSITIVE

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Glenn David Lane and Cynthia Lane, based on the assessment of the information presently available.

Date

6/25/90


Lawrence M. Noble
General Counsel

21040322181



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 JUL -2 AM 11:41

July 2, 1990

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *[Signature]*
General Counsel

SUBJECT: MUR 2837
Glenn David Lane and Cynthia Lane

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe were mailed on July 2, 1990. Following receipt of the respondents' reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to respondents

Staff assigned: Elizabeth Campbell
John Canfield

91040322182



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 2, 1990

Glenn David Lane
1027 Coachlight
Houston, Texas 77077

RE: MUR 2837
Glenn David Lane

Dear Mr. Lane:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on March 14, 1989, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and instituted an investigation in this matter.

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

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

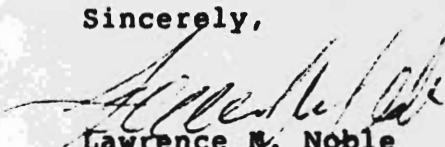
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

21040322183

Glenn David Lane
Page Two

Should you have any questions, please contact John Canfield,
the attorney assigned to this matter, at (202) 376-8200.

Sincerely,


Lawrence M. Noble
General Counsel

Enclosure
Brief

21040322184

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Glenn David Lane

)
) MUR 2837
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On March 14, 1989, the Federal Election Commission found that there was reason to believe that Glenn David Lane violated 2 U.S.C. § 441f, a provision of the Act. In addition, the Commission approved interrogatories and a request for documents to Glenn David Lane. In his response to these interrogatories and request for documents, Lane admits that he made the \$1,000 contribution to Senator Grassley's campaign for which he was subsequently reimbursed by Channell as alleged.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. No person shall make a contribution in the name of another; [or] knowingly permit his or her name to be used to effect that contribution. 11 C.F.R. § 110.4(b).

According to information ascertained in the normal course of carrying out the Commission's supervisory responsibilities, Carl Russell Channell organized a fundraising breakfast in December 1985 on behalf of the 1986 re-election campaign of Senator Charles

21040322185

Grassley. Channell apparently solicited \$1,000 contributions from several associates and acquaintances with respect to this fundraiser. The breakfast was held on December 13, 1985, on Capitol Hill in the Senate dining room. No contributions were apparently delivered to Senator Grassley at this breakfast.

Nevertheless, subsequent to the breakfast, 10 contributions of \$1,000 each were made and delivered to the Grassley Committee. One of these \$1,000 contributions was made by Glenn David Lane, check Number 511, drawn on his account at First Virginia Bank. The Grassley Committee reported the receipt of all of these contributions on December 24, 1985, and reported them as made with respect to the 1986 primary election.

In his response to interrogatories, Glenn David Lane states that in December of 1985, he was employed on an interim basis by Channell at The National Endowment for the Preservation of Liberty. Lane says that Channel solicited him to contribute to the Grassley fundraising breakfast on behalf of both himself and his wife, Cynthia Lane. Lane has stated that he told Channell that he was financially unable to contribute to the Grassley campaign at that time, and that Channell told him (Lane) that he would be reimbursed. A reimbursement of \$2,000 was made on December 17, 1985, for the \$1,000 contributions made by both Glenn David Lane and his wife. Channell described these payments to Lane as a "business expense reimbursement." The reimbursement was included in a check which paid Lane for his consulting services.

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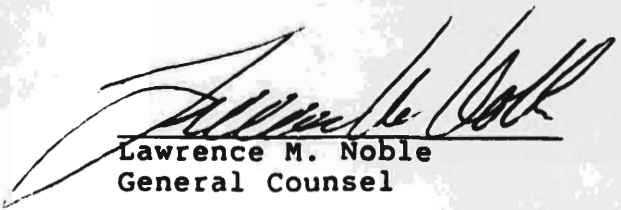
Therefore, the General Counsel concludes that Glenn David Lane made a contribution in violation of 2 U.S.C. § 441f and 11 C.F.R. § 110.4(b).

III. GENERAL COUNSEL'S RECOMMENDATION

1. Find probable cause to believe that Glenn David Lane violated 2 U.S.C. § 441f.

Date

7/2/90


Lawrence M. Noble
General Counsel

21040322187



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 2, 1990

Cynthia Lane
1027 Coachlight
Houston, Texas 77077

RE: MUR 2837
Cynthia Lane

Dear Ms. Lane:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on March 14, 1989, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and instituted an investigation in this matter.

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

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

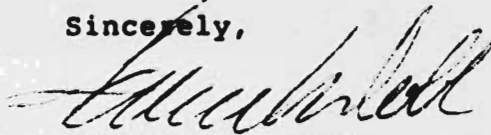
A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

91040322188

Cynthia Lane
Page Two

Should you have any questions, please contact John Canfield,
the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

91040322189

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Cynthia Lane

)
) MUR 2837
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On March 14, 1989, the Federal Election Commission found that there was reason to believe that Cynthia Lane violated 2 U.S.C. § 441f, a provision of the Act. In addition, the Commission approved interrogatories and a request for documents to Cynthia Lane. In her response to these interrogatories and request for documents, Lane admits that she made the \$1,000 contribution to Senator Grassley's campaign for which she was subsequently reimbursed by Channell as alleged.

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. No person shall make a contribution in the name of another; [or] knowingly permit his or her name to be used to effect that contribution. 11 C.F.R. § 110.4(b).

According to information ascertained in the normal course of carrying out the Commission's supervisory responsibilities, Carl Russell Channell organized a fundraising breakfast in December 1985

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on behalf of the 1986 re-election campaign of Senator Charles Grassley. Channell apparently solicited \$1,000 contributions from several associates and acquaintances with respect to this fundraiser. The breakfast was held on December 12, 1985, on Capitol Hill in the Senate dining room. No contributions were apparently delivered to Senator Grassley at this breakfast.

Nevertheless, subsequent to the breakfast, 10 contributions of \$1,000 each were made and delivered to the Grassley Committee. One of these \$1,000 contributions was made by Cynthia Lane, check Number 509, drawn on her account at First Virginia Bank. The Grassley Committee reported the receipt of all of these contributions on December 24, 1985, and reported them as made with respect to the 1986 primary election.

In her response to interrogatories, Cynthia Lane admits that she made the \$1,000 contribution to Senator Grassley's campaign. She states that she wrote the check and then presented it to her husband, Glenn David Lane. In his response to interrogatories, Glenn David Lane states that in December of 1985, he was employed on an interim basis by Channell at The National Endowment for the Preservation of Liberty. Lane says that Channel solicited him to contribute to the Grassley fundraising breakfast on behalf of both himself and his wife, Cynthia Lane. Lane has stated that he told Channell that he was financially unable to contribute to the Grassley campaign at that time, and that Channell told him (Lane) that he would be reimbursed. A reimbursement of \$2,000 was made on December 17, 1985, for the \$1,000 contributions made by both Glenn David Lane and Cynthia Lane. Channell described these

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payments to Glenn David Lane as a "business expense reimbursement." The reimbursement was included in a check which paid Lane for his consulting services.

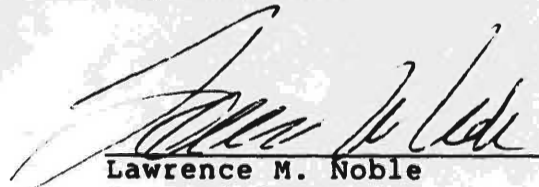
Therefore, the General Counsel concludes that Cynthia Lane made a contribution in violation of 2 U.S.C. § 441f and 11 C.F.R. § 110.4(b).

III. GENERAL COUNSEL'S RECOMMENDATION

1. Find probable cause to believe that Cynthia Lane violated 2 U.S.C. § 441f.

Date

7/2/90


Lawrence M. Noble
General Counsel

21040323192

OGC 6944

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

7/9/90

90 JUL 16 PM 4:30

90 JUL 12 PM 3:42

You state in your Brief of July 2, 1990, MAR 2837,
That Lane violated 2 USC § 441f ... How could
this be?

I clearly stated that Carl Russell Chansol,
my Employer, asked me to go to breakfast with Senator
Grassley ... I accepted and was told to write a check
for \$1,000 ... I declined ... I was then told
it would be made up to me ... Not Reimbursed
as you state ... As far as I was concerned it
could have been more income or more commissions.

The issue would seem to be, Did I conspire to
violate the law ... Absolutely not. Did Chansol
conspire to violate the law ... I have no idea, ask
him or Grassley's representative.

I attended breakfast because my Employer invited
me to do so ... If he was getting around FEC
law that's his problem ... why should I suffer
for his actions?

Sincerely,

Dario Lane

21040322193

SENSITIVE

MUR 2837

AUG 21 1990

EXECUTIVE SESSION

Respondent Glenn David Lane submitted a handwritten response to the Commission on July 12, 1990, urging that the Commission not find probable cause to believe the violations occurred.¹

1. The one-page handwritten response is signed by Glenn David Lane, but it is not clear from the document whether it is intended to be a response only to the action against Glenn David Lane, or also a response to the action against his wife, Cynthia Lane. No separate written document signed by Cynthia Lane was received by

II. ANALYSIS

The Federal Election Campaign Act of 1971, as amended (the "Act"), provides that no person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the name of another person. 2 U.S.C. § 441f. No person shall make a contribution in the name of another; [or] knowingly permit his or her name to be used to effect that contribution. 11 C.F.R. § 110.4(b)

According to information ascertained in the normal course of carrying out the Commission's supervisory responsibilities, Carl Russell Channell organized a fundraising breakfast in December 1985 on behalf of the 1986 re-election campaign of Senator Charles Grassley. Channell apparently solicited \$1,000 contributions from several associates and acquaintances with respect to this fundraiser. The breakfast was held on December 13, 1985, on Capitol Hill in the Senate dining room. No contributions were apparently delivered to Senator Grassley at this breakfast.

Nevertheless, subsequent to the breakfast, 10 contributions of \$1,000 each were made and delivered to the Grassley Committee. One of these \$1,000 contributions was made by Glenn David Lane, check number 511, drawn on his account at First Virginia Bank. Another of these contributions was made by Cynthia Lane, check

(Footnote 1 continued from previous page)
this Office. For the purposes of this report, it will be treated as a response to both briefs.

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number 509, drawn on her account at the First Virginia Bank. The Grassley Committee reported the receipt of all of these contributions on December 24, 1985, and reported them as made with respect to the 1986 primary election.

In his answers to interrogatories, Glenn David Lane states that in December of 1985, he was employed on an interim basis by Channell at The National Endowment for the Preservation of Liberty. Lane says that Channell solicited him to contribute to the Grassley fundraising breakfast on behalf of both himself and his wife, Cynthia Lane. Lane states that he told Channell that he was financially unable to contribute to the Grassley campaign at that time, and that Channell told him (Lane) that the money "would be made up" to him. A reimbursement of \$2,000 was made on December 17, 1985, to Lane for the \$1,000 contributions made by both Glenn David Lane and his wife. Channell described this payment to Lane as a "business expense reimbursement." The reimbursement was included in a check which paid Lane for his consulting services.

Cynthia Lane admitted in her response to interrogatories that she made the \$1,000 contribution to the Grassley campaign. She states that she wrote the check and then presented it to her husband, Glenn David Lane.

In their response to the probable cause briefs filed by the General Counsel, Mr. and Mrs. Lane assert that Channell told Glenn David Lane that the money used in making the contributions to Grassley "would be made up" to him, and the term "reimbursement" was not actually used. See Attachment 1. Mr.

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Lane says that this extra money paid to him after the contributions could have represented extra income or extra commissions, not necessarily reimbursement for the contributions. Lane also states that he did not conspire with Channell to violate any law. He says that he attended the fundraising breakfast because his employer "directed me to do so."

The arguments made by the Lanes do not change the fact that each made a \$1,000 contribution to the Grassley campaign, and that a \$2,000 check was then issued by Carl Russell Channell to Mr. Lane several days later on December 17, 1985. Mr. Lane had clearly indicated to his employer that he and his wife were financially unable to make the solicited contributions. However, both Mr. and Mrs. Lane made \$1,000 contributions after Channell told Mr. Lane that the contributions "would be made up" to him. Channell in fact paid \$2,000 to Mr. Lane several days after the fundraising breakfast. The violation of Section 441f occurred in this situation whether or not the term "reimbursement" was actually spoken by Mr. Channell. Even if, as Mr. Lane argues, these contributions were "made up" to him via extra commissions or extra income, this still would constitute a contribution by one person made in the name of another. The ultimate source of the funds used to effect these contributions was Carl Russell Channell. Attending the fundraising breakfast and making the solicited contributions because he was "directed" to do so by his employer does not legitimize the violation of the Act.

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Therefore, the General Counsel concludes that Glenn David Lane and Cynthia Lane each made contributions in violation of 2 U.S.C. § 441f.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

This Office recommends that the Commission, in entering postprobable cause conciliation with the respondents, approve the attached proposed conciliation agreement which includes an admission of the violations and a proposed joint civil penalty of

IV. RECOMMENDATIONS

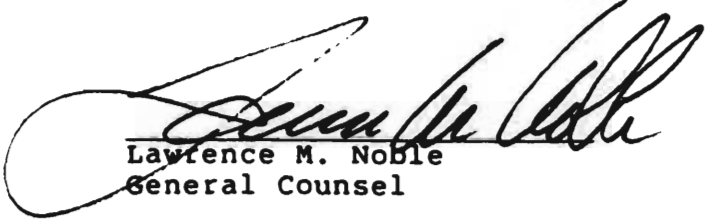
1. Find probable cause to believe that Glenn David Lane violated 2 U.S.C. § 441f.

2. Find probable cause to believe that Cynthia Lane violated 2 U.S.C. § 441f.

3. Approve the attached conciliation agreement and the appropriate letters.

Date

8/13/90


Lawrence M. Noble
General Counsel

Attachments:

1. Lane response
2. Conciliation Agreement

Staff assigned: John Canfield

21040322198

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2837
Glenn David Lane and)
Cynthia Lane.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on August 21, 1990, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2837:

1. Find probable cause to believe that Glenn David Lane violated 2 U.S.C. § 441f.
2. Find probable cause to believe that Cynthia Lane violated 2 U.S.C. § 441f.
3. Approve the conciliation agreement attached to the General Counsel's report dated August 13, 1990,
4. Approve the appropriate letters as recommended in the General Counsel's report dated August 13, 1990.

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

Attest:

8-27-90
Date

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

91040322199



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 4, 1990

Glenn David Lane
Cynthia Lane
1027 Coachlight
Houston, Texas 77077

RE: MUR 2837
Glenn David Lane and
Cynthia Lane

Dear Mr. and Mrs. Lane:

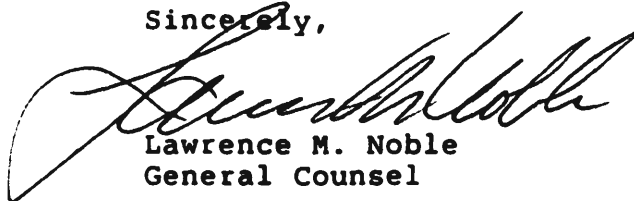
On August 21, 1990, the Federal Election Commission found that there is probable cause to believe each of you violated 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended, in connection with contributions to the campaign of Senator Charles Grassley in 1985.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a joint conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact John Canfield, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

2104032200



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

October 18, 1990

Glenn David Lane
Cynthia Lane
1027 Coachlight
Houston, Texas 77077

RE: MUR 2837
Glenn David Lane and
Cynthia Lane

Dear Mr. and Mrs. Lane:

On September 4, 1990, you were notified that the Federal Election Commission found probable cause to believe that each of you violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. Insofar as more than 30 days have elapsed without a response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a response from you before November 13, 1990.

Should you have any questions, please contact John Canfield, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9104032201



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 14, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glenn David Lane
Cynthia Lane
1027 Coachlight
Houston, Texas 77077

RE: MUR 2837
Glenn David Lane and
Cynthia Lane

Dear Mr. and Mrs. Lane:

On September 4, 1990, you were notified that the Federal Election Commission found probable cause to believe that each of you violated 2 U.S.C. § 441f. On that same date, you were sent a conciliation agreement offered by the Commission in settlement of this matter.

Please note that pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), the conciliation period in this matter may not extend for more than 90 days, but may cease after 30 days. This 90 day limitation for conciliation was reiterated to you in a reminder letter dated October 18, 1990, as well as in your telephone conversations with this office on September 18 and October 31, 1990. Conciliation negotiations must be completed within this 90 day period. Insofar as more than 60 days have elapsed without a written response from you, a recommendation concerning the filing of a civil suit will be made to the Commission by the Office of the General Counsel unless we receive a written response from you before December 4, 1990.

Should you have any questions, please contact John Canfield, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL

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COMMISSION

90 DEC -4 AM 11:21

OGC 8854

Lane & Associates

Public Relations

G. DAVID LANE

President

12/3

90 DEC -5 AM 10:41

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF LEGAL COUNSEL

John,

Thanks for your Help ... Ask
Commission to give me a Break!

Sincerely,

Davis

P.S. Enclosed is most recent Correspondence
w/ 29 Nov. Postdate.

21040322203

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90 DEC 14 PM 3:23

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of

Glenn David Lane

Cynthia Lane

Daniel Conrad

Francis D. Gomez

Esperanza N. Gomez

Richard R. Miller

Joy M. Miller

Eric Jon Olson

F. Clifton Smith

MUR 2837

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Respondents Glenn David Lane and Cynthia Lane.

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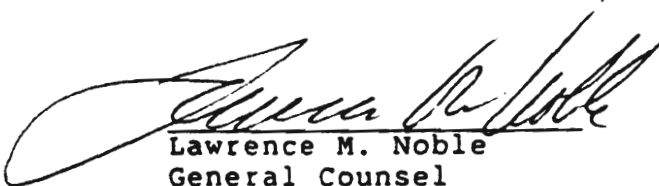
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II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Glenn David Lane and Cynthia Lane.
2. Close the file.
3. Approve the appropriate letter.

Date

12/14/90


Lawrence M. Noble
General Counsel

Attachments

1. Conciliation Agreement

Staff Assigned: John Canfield

Hisher

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Glenn David Lane;)
Cynthia Lane;) MUR 2837
Daniel Conrad;)
Francis D. Gomez;)
Esperanza N. Gomez;)
Richard R. Miller;)
Joy M. Miller;)
Eric Jon Olsen;)
F. Clifton Smith.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 19, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2837:

1. Accept the conciliation agreement with Glenn David Lane and Cynthia Lane, as recommended in the General Counsel's Report dated December 14, 1990.
2. Close the file.

(continued)

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3. Approve the appropriate letter, as recommended in the General Counsel's Report dated December 14, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

12/19/90
Date

Hilda Christ
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Fri., December 14, 1990 3:23 p.m.
Circulated to the Commission: Mon., December 17, 1990 11:00 a.m.
Deadline for vote: Wed., December 19, 1990 11:00 a.m.

dh

91040322207



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

December 28, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glenn David Lane
Cynthia Lane
5100 Westheimer
Houston, Texas 77056

RE: MUR 2837
Glenn David Lane and
Cynthia Lane

Dear Mr. and Mrs. Lane:

On December 19, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. You are reminded that you have thirty days to comply with the provisions of the agreement, including the payment of the civil penalty.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact John Canfield, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

91040322208

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Glenn David Lane and
Cynthia Lane

)
)
)
)
)

MUR 2837

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Glenn David Lane and Cynthia Lane ("Respondents") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C.

§ 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

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

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

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

1. The Federal Election Campaign Act of 1971, as amended, ("the Act"), provides that no person shall make a contribution in the name of another person or knowingly permit his or her name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the

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name of another person. 2 U.S.C. § 441f.

2. No person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. 11 C.F.R. § 110.4(b).

3. Respondents Glenn David Lane and Cynthia Lane, husband and wife, are persons as defined by the Act. 2 U.S.C. § 431(11).

4. In December, 1985, Glenn David Lane was employed by Carl Russell Channell and the National Endowment for the Preservation of Liberty.

5. In December, 1985, Carl Russell Channell solicited Respondent Glenn David Lane for \$1,000 contributions from both himself and his wife, Cynthia Lane, on behalf of the 1986 re-election campaign of Senator Charles Grassley.

6. Upon informing Channell that he and his wife were financially unable to make such contributions, Channell instructed Lane to make the contributions and the money would be made up to him.

7. Glenn David Lane made a \$1,000 contribution to the Grassley Committee, check Number 511, on his account at the First Virginia Bank.

8. Cynthia Lane made a \$1,000 contribution to the Grassley Committee, check Number 509, on her account at the First Virginia Bank.

9. The Grassley Committee reported the receipt of these contributions on December 24, 1985, and reported them as made with respect to the 1986 primary election.

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10. On December 17, 1985, a check in the amount of \$2,000 was given to Glenn David Lane from the National Endowment for the Preservation of Liberty, representing funds equal to the two contributions made to the Grassley Committee by Glenn David Lane and Cynthia Lane. This check was deposited into the Lanes' joint checking account at the First Virginia Bank.

V. Respondents Glenn David Lane and Cynthia Lane each allowed their names to be used to make \$1,000 contributions to the re-election campaign of Senator Charles Grassley, in violation of 2 U.S.C. § 441f.

VI. Respondents will pay a joint civil penalty to the Federal Election Commission in the amount of two hundred dollars (\$200), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree not to make any further contributions in the name of another person or to accept reimbursement for contributions from another person in the future.

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

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

X. Respondents shall have no more than thirty (30) days from

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the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

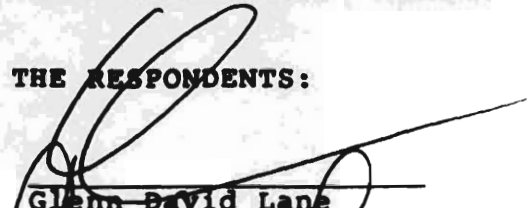
Lawrence M. Noble
General Counsel

BY:

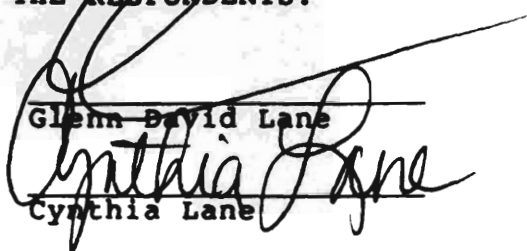

Lois G. Lerner
Associate General Counsel

12-27-90
Date

FOR THE RESPONDENTS:


Glenn David Lane

16/4/90
Date


Cynthia Lane

16/4/90
Date

31040322212



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2837

DATE FILMED 2/7/91 CAMERA NO. 4

CAMERAMAN AS

91040322213



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2837.

210403344275



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 27, 1991

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Glenn David Lane
Cynthia Lane
c/o Lane & Associates
5100 Westheimer; Suite 275
Houston, Texas 77056

CLOSED

RE: MUR 2837
Glenn David Lane and
Cynthia Lane

Dear Mr. and Mrs. Lane:

On December 19, 1990, the Federal Election Commission and you entered into a conciliation agreement in settlement of a violation of 2 U.S.C. § 441f. According to the agreement, you were required to pay a civil penalty of \$200 within 30 days.

According to Commission records, your payment has not been received. Please be advised that, pursuant to 2 U.S.C. § 437g(a)(5)(D), violation of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court. Unless we receive the payment from you in five days, this Office will recommend that the Commission file suit to remedy this violation.

If you believe the Commission's records are in error, or if you have any questions, please contact John Canfield, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

672433421



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

91040843768

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2837.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

May 23, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glenn David Lane
Cynthia Lane
c/o Lane and Associates
5100 Westheimer; Suite 275
Houston, Texas 77056

RE: MUR 2837
Glenn David Lane
Cynthia Lane

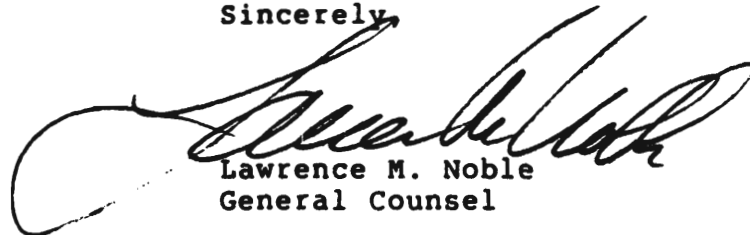
Dear Mr. and Mrs. Lane:

On December 19, 1990, the Federal Election Commission and you entered into a conciliation agreement in settlement of violations of 2 U.S.C. § 441f. According to the agreement, which was your counterproposal to the Commission, you were required to pay a civil penalty of \$200 within 30 days.

Despite telephone calls and reminder letters, your payment of the civil penalty has not been received. As a result of this nonpayment, the Commission has authorized the General Counsel to institute a civil action for relief in the United States District Court.

Should you have any questions, or should you wish to make payment prior to the filing of a suit, please contact John Canfield, the attorney assigned to this matter, at (202)376-8200, within five days of your receipt of this letter.

Sincerely,



Lawrence M. Noble
General Counsel

21040343769

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Glenn David Lane;
Cynthia Lane.

)
) MUR 2837
)
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on May 21, 1991, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 2837:

1. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against Glenn David Lane and Cynthia Lane.
2. Approve the appropriate letter as recommended in the General Counsel's report dated May 13, 1991.

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

Attest:

May 21, 1991
Date

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

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91 MAY 13 PM 4:42

SENSITIVE

MAY 21 1991

EXECUTIVE SESSION

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Glenn David Lane
Cynthia Lane

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)
)
)

MUR 2837

GENERAL COUNSEL'S REPORT

I. BACKGROUND

The Commission accepted a joint conciliation agreement signed by both Glenn David Lane and Cynthia Lane on December 14, 1990. The agreement was a counteroffer proposed by the respondents, and provided for a civil penalty of \$200 for their violation of 2 U.S.C. § 441f. See Attachment 1.

To date, the respondents have not paid the civil penalty. Glenn David Lane was advised by this Office during a telephone conversation on January 10, 1991 that he had 30 days in which to pay the civil penalty. A reminder letter was sent to the respondents on February 27, 1991. See Attachment 2. The certified mail receipt indicates that the letter was received on March 5, 1991.

Respondent Glenn David Lane contacted this Office by telephone on March 11, 1991. During that conversation, Lane indicated that he was having personal financial problems, but would try to make the payment as soon as possible. Mr. Lane was reminded during this conversation that the Commission accepted the counteroffer which Lane himself had proposed, and that the

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next step would be to authorize suit to enforce the conciliation agreement. It should be noted that Mr. Lane currently has sufficient financial resources with which to operate his own business, Lane and Associates of Houston, Texas, and apparently employs at least one employee as his receptionist.

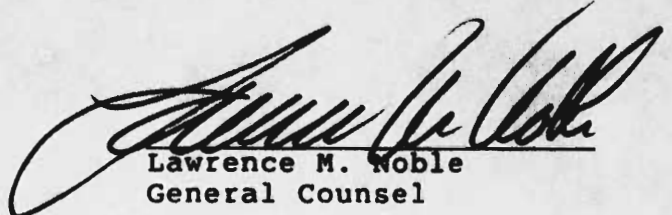
II. RECOMMENDATIONS

1. Authorize the Office of the General Counsel to file a civil suit for relief in United States District Court against Glenn David Lane and Cynthia Lane.

2. Approve the appropriate letter.

Date

3/14/91


Lawrence M. Noble
General Counsel

Attachment

1. Conciliation agreement & letter (12/28/90)
2. Reminder letter (2/27/91)

Staff Assigned: John Canfield

91040343772



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 28, 1990

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Glenn David Lane
Cynthia Lane
5100 Westheimer
Houston, Texas 77056

RE: MUR 2837
Glenn David Lane and
Cynthia Lane

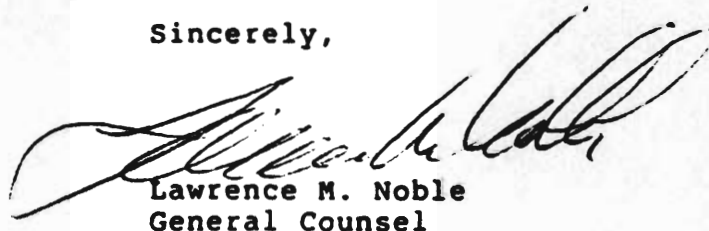
Dear Mr. and Mrs. Lane:

On December 19, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on your behalf in settlement of a violation of 2 U.S.C. § 441f, a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter. You are reminded that you have thirty days to comply with the provisions of the agreement, including the payment of the civil penalty.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact John Canfield, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

ATTACHMENT 1

91040843773

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Glenn David Lane and
Cynthia Lane

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NUR 2837

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that Glenn David Lane and Cynthia Lane ("Respondents") violated 2 U.S.C. § 441f.

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

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

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

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

1. The Federal Election Campaign Act of 1971, as amended, ("the Act"), provides that no person shall make a contribution in the name of another person or knowingly permit his or her name to be used to effect such a contribution, and no person shall knowingly accept a contribution made by one person in the

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name of another person. 2 U.S.C. § 441f.

2. No person shall make a contribution in the name of another or knowingly permit his or her name to be used to effect that contribution. 11 C.F.R. § 110.4(b).

3. Respondents Glenn David Lane and Cynthia Lane, husband and wife, are persons as defined by the Act. 2 U.S.C. § 431(11).

4. In December, 1985, Glenn David Lane was employed by Carl Russell Channell and the National Endowment for the Preservation of Liberty.

5. In December, 1985, Carl Russell Channell solicited Respondent Glenn David Lane for \$1,000 contributions from both himself and his wife, Cynthia Lane, on behalf of the 1986 re-election campaign of Senator Charles Grassley.

6. Upon informing Channell that he and his wife were financially unable to make such contributions, Channell instructed Lane to make the contributions and the money would be made up to him.

7. Glenn David Lane made a \$1,000 contribution to the Grassley Committee, check Number 511, on his account at the First Virginia Bank.

8. Cynthia Lane made a \$1,000 contribution to the Grassley Committee, check Number 509, on her account at the First Virginia Bank.

9. The Grassley Committee reported the receipt of these contributions on December 24, 1985, and reported them as made with respect to the 1986 primary election.

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10. On December 17, 1985, a check in the amount of \$2,000 was given to Glenn David Lane from the National Endowment for the Preservation of Liberty, representing funds equal to the two contributions made to the Grassley Committee by Glenn David Lane and Cynthia Lane. This check was deposited into the Lanes' joint checking account at the First Virginia Bank.

V. Respondents Glenn David Lane and Cynthia Lane each allowed their names to be used to make \$1,000 contributions to the re-election campaign of Senator Charles Grassley, in violation of 2 U.S.C. § 441f.

VI. Respondents will pay a joint civil penalty to the Federal Election Commission in the amount of two hundred dollars (\$200), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree not to make any further contributions in the name of another person or to accept reimbursement for contributions from another person in the future.

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

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

X. Respondents shall have no more than thirty (30) days from

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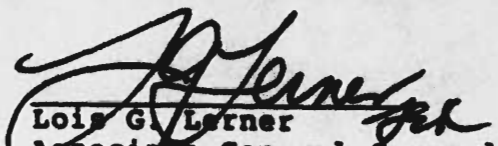
the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

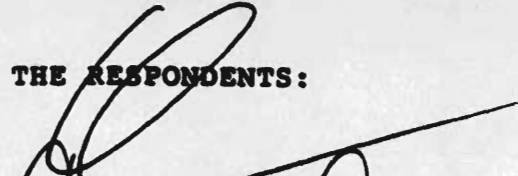
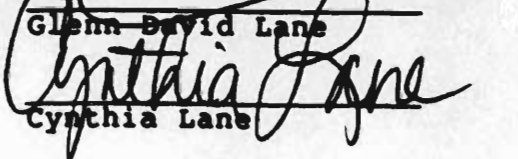
Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

12-27-90
Date

FOR THE RESPONDENTS:


Glenn David Lane

Cynthia Lane

10/4/90
Date
10/4/90
Date

91040843777



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

February 27, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Glenn David Lane
Cynthia Lane
c/o Lane & Associates
5100 Westheimer, Suite 275
Houston, Texas 77056

RE: MUR 2837
Glenn David Lane and
Cynthia Lane

Dear Mr. and Mrs. Lane:

On December 19, 1990, the Federal Election Commission and you entered into a conciliation agreement in settlement of a violation of 2 U.S.C. § 441f. According to the agreement, you were required to pay a civil penalty of \$200 within 30 days.

According to Commission records, your payment has not been received. Please be advised that, pursuant to 2 U.S.C. § 437g(a)(5)(D), violation of any provision of the conciliation agreement may result in the institution of a civil suit for relief in the United States District Court. Unless we receive the payment from you in five days, this Office will recommend that the Commission file suit to remedy this violation.

If you believe the Commission's records are in error, or if you have any questions, please contact John Canfield, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

ATTACHMENT 2

91040843778

Canfield



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Cy*
DATE: May 13, 1991
SUBJECT: MUR 2837 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of Tuesday, May 21, 1991

Open Session _____

Closed Session XXX

CIRCULATIONS

48 Hour Tally Vote
Sensitive
Non-Sensitive

24 Hour No Objection
Sensitive
Non-Sensitive

Information
Sensitive
Non-Sensitive

Other [XX]

SENSITIVE - circulate on

blue paper

DISTRIBUTION

Compliance [XX]

Audit Matters []

Litigation []

Closed MUR Letters []

Status Sheets []

Advisory Opinions []

Other (see distribution
below) []