FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2989

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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October 11, 1989

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA
STAFF DIRECTOR

FROM: ROBERT J. COSTA
ASSISTANT STAFF DIRECTOR
AUDIT DIVISION

SUBJECT: FRIENDS OF MATTINGLY - MATTERS REFERABLE TO THE OFFICE OF GENERAL COUNSEL

On October 10, 1989, the Commission voted to refer Exhibits A through G which constitute the findings contained in the interim audit report which were not adequately responded to by the Committee. Should you have any questions or require access to audit workpapers, please contact Martin Favin or Joseph Stoltz at 376-5320.

Attachments as stated

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A. Excessive Contributions

Section 441a(a)(1)(A) and (2)(A) of Title 2 of the United States Code states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000 and that no multicandidate political committee shall make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $5,000.

The term "election" is defined at 2 U.S.C. § 431(1)(A) as a general, special, primary, or runoff election.

Section 110.1(a)(2)(i) and (ii) of Title 11 of the Code of Federal Regulations[1/] states that "With respect to any election" means:

- In the case of a contribution designated in writing for a particular election, the election so designated, except that a contribution made after a primary election, caucus or convention and designated for the primary election, caucus or convention shall be made only to the extent that the contribution does not exceed net debts outstanding from the primary eleciton, caucus or convention.
- In the case of a contribution not designated in writing for a particular election, for a primary election, caucus or convention, if made on or before the date of the election, caucus or convention, or for a general election if made after the date of the primary election.

11 C.F.R. § 104.8(d)[1/] states that a contribution which represents contributions by more than one person shall indicate on the written instrument, or on an accompanying written statement signed by all contributors, the amount to be attributed to each contributor.

2 U.S.C. § 441a(f) states that no candidate or political committee shall knowingly accept any contribution in violation of any limitation on contributions.

1/ Citations from Parts 104 and 110 of Title 11 of the Code of Federal Regulations refer to Regulations in effect prior to the April 8, 1987 amendments to those sections.

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Background

The Audit staff reviewed the Committee's cash-on-hand records to calculate the Committee's financial position as of the August 12, 1986 primary election. The Committee maintained separate operating accounts for primary and general election activity.

The auditors calculated the Committee's combined primary-related bank balance as of 8/12/86 which includes the 8/12/86 adjusted balances from the primary account and from an additional bank account with minimal activity after the date of the primary election. The 8/12/86 balances from several primary-related Certificate of Deposit accounts were also included in the calculation.

A review of invoices in support of post-8/12/86 disbursements made from the primary and general bank accounts was undertaken to determine if the disbursements were primary-related. In addition, a bank loan which was outstanding at 8/12/86, along with accompanying interest, was considered primary-related.

Based on this review, the auditors determined that the Committee's financial position at the time of the August 12, 1986 primary election was a $193,202.10 surplus. Therefore, the Committee could not accept contributions designated for the primary election made after August 12, 1986, pursuant to 11 C.F.R. § 110.1(a)(2)(i).

In a letter dated December 9, 1988 the Committee takes exception to the Audit staff calculation of the August 12, 1986 net debt. Mr. Stewart makes several points each of which is discussed below.

First, the Committee notes that the figure in the audit report differs from that contained in the workpapers provided at the exit conference and that the report does not include the calculation. The report surplus figure is approximately $10,000 higher than that discussed at the exit conference. The difference is due to a correction made after the exit conference regarding a loan balance and associated interest. This change does not in any way change the conclusion. As noted later in Mr. Stewart's letter, a meeting was held between he and the auditors on August 2, 1988. At that meeting, Mr. Stewart was told that any information which would be of assistance in his response would be provided. During the approximately four months provided for the Committee to prepare their response, no requests for information or explanations were received.

Second, is the inclusion of post primary payments as primary obligations. The Committee states that they have identified $405,368.22 in payroll, payroll taxes, general operating

expenses, and media contracts paid within 30 days after the primary. The Committee included this amount in their deficit calculation. (See Committee response, page 2.) Though no indication is provided as to how this amount is derived, a review of Committee disclosure reports indicates that the amount represents almost all disbursements for 30 days after the primary.2/ Thus, the Committee appears to argue that 100% of all disbursements for thirty days after the primary are primary expenses. Given a relatively late primary (August 12, 1986), a very close general election race, and a primary where the Candidate received 95% of the vote, this does not appear to be a reasonable assumption. No support for the Committee's position was provided.

The Committee next notes that 11 C.F.R. §110.1(b)(3)(ii) includes among expenses which may be considered in determining net debt, the cost of raising funds to liquidate debt and the estimated costs associated with termination of political activity, including costs of complying with post-election requirements of the Act. Mr. Stewart goes on to state that "It doesn't appear that any of these estimated expenses were considered in coming to a conclusion that a primary surplus existed."

In a situation where a surplus exists, there seems little need for a fundraising allowance. With respect to the costs of terminating political activity, the Regulation specifies these costs are to be included if the authorized committee terminates or if the candidate will not be a candidate for the next election. Given that the candidate was successful in the primary election and was participating in the next (general) election and that the Committee was not terminating after the primary election, no cost of termination allowance is required.

Third, the Committee argues that all payments to certain consultants and vendors should be included as primary debts since contracts were signed with these consultants and vendors before the primary election. The Committee further notes that as part of the campaign strategy, payments to these consultants and vendors were delayed in order to show a large cash balance in hopes of discouraging opponents.

The Committee submitted no supporting documentation to demonstrate that all or part of these obligations were incurred before the primary. However, if it is assumed that certain obligations were incurred before August 12, 1986, that fact alone

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2/ The Committee reported $426,135.84 in disbursements between August 13 and September 12, 1988. This includes two payments to vendors which appear to be included by the Committee under "contract obligations." The net amount of August 13 to September 12, 1986 reported disbursements is $381,270.61.

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does not determine to which election the expenditure is attributable. Further, if the Committee intentionally delayed payments to certain vendors and consultants while reporting no outstanding debts, a reporting violation is indicated. (11 CFR §104.3(d))

The Committee's calculation of the primary deficit also includes a $100,000 estimate for the cost of post election compliance. There is no support provided for this figure.

The Committee calculation shows a cash on hand amount of $352,241.11. The audit calculation includes cash on hand of $468,440.95 consisting of $18,440.95 in bank balances and $450,000.00 in certificates of deposit purchased from the primary bank account. Since the Committee did not provide any support for their calculation, the cause of the difference is unknown. The Audit net debt calculation also includes a $45,123.75 liability for a loan the proceeds of which were deposited into the primary account; a $51,057.00 liability for a certificate of deposit which was purchased from the General Election account but the proceeds of which were deposited into the Primary Account; primary related disbursements totaling $23,713.86 paid from the Primary Account after August 12, 1986; and primary related disbursements totaling $155,344.24 paid from the General Election account after August 12, 1986. The post August 12, 1986 expenses were determined from a review of cancelled checks and invoices.

Finally, it is noted that in a response to a Request for Additional Information concerning whether the Committee had debt from the primary election and the incomplete disclosure of debts on the post general election report, Mr. Stewart stated:

"In response to the question regarding the outstanding indebtedness shown on Schedule D, it is impossible to furnish this information in as much as the campaign did not maintain an accounts payable ledger nor is anyone that was connected with the campaign available to answer any questions about the records. The amount of indebtedness was ascertained as best as possible on the day after the election. Each subsequent day brought in new bills which were added to the total...The records, consisting of over 29 boxes, have been moved three times since the election. Thus it is an impossible task to reconstruct any accurate accounts payable list as of a certain date after the fact."

This letter was received by the Commission while the Audit fieldwork was underway.

The Audit staff has made no adjustment to the interim audit report primary surplus amount as a result of the Committee's response.

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1. From Individuals

The Committee's 1985-86 contribution records were tested to determine if any contributions from individuals were accepted that were in excess of the 2 U.S.C. § 441a(a)(1)(A) limitation. The test results indicated that the Committee had accepted a material number of excessive contributions from individuals. Therefore, the Audit staff performed an extensive review of individual contributions to determine the extent of excessive contributions accepted by the Committee. In the conduct of this review, the Audit staff utilized the Committee's automated contributor data base along with supporting records.

To determine the election to which a contribution should be applied, any designation appearing on the contribution check or correspondence from the contributor was followed.3/ Absent such a designation, contributions dated on or before the August 12, 1986 primary election were considered to have been made for the primary election and those dated after August 12, 1986 for the general election. Where possible, the date of the contribution check was used, however, where that date was not available the Audit staff used the date recorded in the Committee's automated contribution data base. Further, contributions were attributed only to persons whose signatures appeared on the written instrument or on an associated piece of correspondence.

All contributions which initially appeared to be excessive were further reviewed to determine if refunds had been timely made or a reattribution had been obtained. An attribution to another contributor was considered only where the additional contributor's signature was obtained.

It is noted that the magnetic tape containing Committee contributions that was provided to the Audit staff contained no contributor records which reflected total contributions in excess of $2,000 for the election cycle. From our anaylsis of selected records, it appears that the Committee routinely attributed amounts, which would otherwise be in excess of the contribution limitation, to a contributor's spouse. It further appears that amounts received before the primary election which were in excess of the primary election contribution limit were routinely recorded as general election contributions and vice versa.

3/ As noted, the Committee was in a surplus position on the date of the primary election. Therefore, any amount designated by a contributor for the primary election after the date of the primary is considered to be an excessive contribution.

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The review of individual contributions described above identified 706 apparent excessive contributions from 504 individuals totaling $345,590.

Attachment 1 contains a schedule of the apparent excessive contributions discussed above.

In the interim audit report, the Audit staff recommended that the Committee either demonstrate that these contributions were not in excess of the limitations, or refund the contributions and submit evidence of the refunds.

In his response, Mr. Stewart states that one of the contributors on Attachment 1 is a fictitious name filed pursuant to 11 C.F.R. §104.3(e). Mr. Stewart further states that contrary to the indication in the audit report, no fictitious name was entered into the Committee's contribution data base and that no fictitious name had an excessive contribution attributed to it.4/

The Audit staff obtained copies of the pseudonym lists filed by the Committee. These lists contained 14 names, all of which are contained in the computer data base generated from the contribution tape provided by the Committee. Two of these names show apparent excessive contributions. In both cases, two contributions are shown dated before the primary and totaling in excess of $1,000. Also, in both cases the amount in excess of $1,000 was shown on the data base as a general election contribution. Since no documentation showing an election designation for these contributions was found, the contributions were considered primary election contributions and hence excessive.

Both fictitious names have been deleted from Attachment I and the amount of excessive contributions reduced to $344,840.00 (704 contributions from 502 contributors).

Mr. Stewart also states that reattribution letters were sent to excessive contributors and that "All of these reattribution letters were on file in the campaign records."

The Audit staff searched the boxes of records which were available and located those reattribution letters which were in the records. As noted by Mr. Stewart, the auditors only considered reattribution letters which met the requirements of 11 C.F.R. §104.8(d) as it was written at the time the contributions were made. ("A contribution which represents contributions by more than one person shall indicate on the

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4/ Section 104.3(e)(4) of Title 11 of the Code of Federal Regulations states that no authorized committee of a candidate shall attribute more than $1,000 in contributions to the same pseudonym for each election.

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written instrument, or on an accompanying written statement signed by all contributors (emphasis added), the amount to be attributed to each contributor.")

Next, Mr. Stewart mentions that the records were stored in a warehouse and were moved by the auditors to a hotel to conduct the audit. He also states that the records were secured in the hotel conference room during a hiatus in the fieldwork. He goes on the say that he does not believe the records were adequately safeguarded; and that it is inexplainable that the records were intact in the warehouse and subsequently some were not available for the auditors' inspection.

First, at the entrance conference Mr. Stewart stated that some of the boxes were in his office and some were in the warehouse. Later, an additional box was located in Republican Party headquarters in Atlanta. Based on discussions with Mr. Stewart it was apparent that he was not familiar with the records or their exact location. Given this, the Audit staff does not accept the premise that the records were intact at the warehouse.

Second, as for the security of the records, the Audit staff shares Mr. Stewart's concern. Before the records were left in the hotel conference room, the procedure was cleared with Mr. Stewart. If he had objected, the records would have been moved back to the warehouse. The hotel manager was asked if the door of the room could be deadbolted and the need for security was explained. The Audit staff was told that the door could be "double locked" requiring the managers key and the room key to open the door. Therefore, the room was inaccessible to the hotel staff. The double locking procedure was performed under Audit staff supervision. Upon returning, the staff was required to wait until the manager came from his home with his key to gain access to the room. When the room was entered, nothing appeared to have been disturbed. The Audit staff believes that the records under FEC control were adequately safeguarded.

Finally, Mr. Stewart observes that some of the excessive contributions on Attachment 1 have been refunded. He is correct. Those indicated by footnotes 6, 7, and 8 were refunded in whole or in part; however, the refunds were not timely. The footnotes on Attachment 1 to the Interim Audit Report made that clear. The five refunded contributions identified on Attachment 1 total $2,250.00, leaving $342,590.00 in excessive contributions unresolved.

2. From Political and Other Committees

The Committee received apparent excessive contributions from 17 political and other committees totalling $35,192.56. These contributions were identified using copies of

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contribution checks from committee files, contributions reported by other committees and contributions reported by the Committee. Where the amount of the excessive contribution was determined by the election for which one or more contributions were designated, any designation on the contribution check or accompanying correspondence was followed. Where no such designation was available the election designation on the contributing committee's disclosure reports was used. Where no election designation was found, the date of the contribution check was used to determine the election for which the contribution was intended. Finally, any contribution designated for the primary election but dated after the primary was considered excessive given that, as discussed above, the Committee had no primary debt (See Attachment 2 for a listing of excessive contributions).

In the interim audit report, the Audit staff recommended that the Committee either demonstrate that these contributions were not in excess of the limitations or refund the contributions and submit evidence of the refunds.

In their response, the Committee states that the election designation recorded by the Committee followed the contributing committee's designation. As noted above, where Committee records contained evidence of such a designation, the Audit staff also followed the contributor's designation. However, contributor committee disclosure report election designations were followed when Committee records contained no election designation, with the date of the contribution used in the absence of any other information. These designations do not always match those reported by the Committee.

In some cases, the Committee contends that the contributions are not excessive by virtue of the existence of a primary debt in October of 1986. As noted above, the Audit staff does not accept the Committee's net debt calculation. As for the Committee's question concerning the reason some of these committees would report more than the permissible amount contributed for the same election, no answer is available. However, in a number of cases, the contributions which make up the excessive amounts begin as early as 1982. In some cases, if only contributions made in 1985 and 1986 are considered, (a period often considered an election cycle), the excessive amount is eliminated or reduced.

Finally, the Committee states that Floridians for President Reagan's Majority (Floridians) is now a registered committee. This does not address the potential excessive contribution problem. In MUR 2577, it was learned that Floridians was a joint fundraising committee authorized by the Committee and the Committee to Re-Elect Senator Paula Hawkins (the Hawkins Committee). The joint fundraising agreement states that expenses and proceeds are to be split equally. The report

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filed by Floridians indicates that the gross proceeds were $14,075 and expenses were $776.78. Further, documents contained in the MUR file indicate that $3,250.00 was earmarked to the Hawkins Committee and $3,325.00 was earmarked to the Committee. The earmarking was accomplished by making the checks payable to the intended recipient. These checks were not deposited by Floridians but rather were forwarded to the recipients uncashed. The remaining $7,500.00 in contributions was deposited by Floridians. From this amount the expenses were paid with 100% of the balance $6,723.22 being forwarded to the Committee. As a result, the Committee received $3,363.71 more than it was entitled to receive and the Hawkins Committee received $3,363.71 less. Therefore, the Committee has received $2,363.71 ($3,363.71 less a $1,000 contribution limitation) more from the Hawkins Committee (Via Floridians) than the contribution limitations permit.

Given the above, the list of excessive contributions from political committees at Attachment 2 has been revised to eliminate the $5,723.22 excessive amount from Floridians and include a $2,363.71 excessive amount from the Hawkins Committee, leaving the total excessive amount at $31,833.05. No other adjustments to the interim audit report finding have been made.

Recommendation #1

The Audit staff recommends that these matters be referred to the Office of General Counsel.

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Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Bernard W. Abrams	8/04/83	1,000.00	1,000.00	O	DB	P
Mr. David L. Abrams	10/31/84	1,000.00	1,000.00	O	DB	P
Mr. Charles Adams	10/02/86	1,400.00	400.00	LP	CK	G
Mrs. Myrna Adams	10/02/86	1,250.00	250.00	LP	CK	G
Mr. J.E. Aderhold	5/31/85	1,000.00	1,000.00	O	CK	P
Mrs. Rebecca Alise	9/17/86	1,250.00	250.00	LP	CK	G
	9/25/86	150.00	150.00	O	CK	G
Mr. Nicholas Alise	9/17/86	1,250.00	250.00	LP	CK	G
Mrs. Joe Allen	10/14/86	250.00	250.00	O	DB	G
Mr. Joe Allen	10/14/86	250.00	250.00	O	DB	G
Mrs. Ricky L. Allman	10/14/86	250.00	250.00	O	DB	G
Mr. Ricky L. Allman	10/14/86	250.00	250.00	O	DB	G
Mr. John B. Amos	1/29/86	250.00	250.00	O	DB	P
	3/01/84	1,000.00	250.00	O	CK	P
Mr. M.C. Anderson	5/31/85	3,000.00	2,750.00	O	CK	P
	6/14/85	250.00	250.00	O	DB	P
Mr. Stanton D. Anderson	10/06/83	500.00	500.00	O	DB	P
Mrs. Dannie C. Anderton	10/14/86	250.00	250.00	O	DB	G

Apparent Excessive Contributions From Individuals

	Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
	Mr. Kenneth W. Anderton	9/19/86	2,500.00	500.00	LP	CK	G
				1,000.00	O	CK	G
	Mr. William W. Anderton	10/14/86	250.00	250.00	O	DB	G
	Mrs. Carmen Angelo	10/14/86	250.00	250.00	O	DB	G
3	Mr. Carmen Angelo	10/14/86	250.00	250.00	O	DB	G
39	Mr. Frank Argenbright	10/24/86	1,000.00	600.00	O	CK	G
4	Mr. Paul Arnesan	7/31/85	1,000.00	250.00	O	CK	P
5	Mr. Gus Arrendale	5/31/85	1,500.00	500.00	O	CK	P
43	Mrs. Hollis Arrendale	5/31/85	1,500.00	500.00	O	CK	P
30	Mr. John Arrendale	5/31/85	1,500.00	500.00	O	CK	P
2	Mr. Tom Arrendale	2/07/85	1,000.00	1,000.00	O	CK	P
	Mr. W.L. Arrendale	2/07/85	1,000.00	1,000.00	O	CK	P
	Mrs. Anita Askew	10/14/86	250.00	250.00	O	DB	G
	Mr. Neal A. Askew	10/14/86	250.00	250.00	O	DB	G
	Mr. Jim C. Autry	9/09/85	2,000.00	1,000.00	O	CK	P
	Mr. Fred P. Ayers	10/16/86	200.00	200.00	O	DB	G
	Mr. Thomas N. Bagwell	11/26/85	100.00	100.00	O	DB	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Alvin Barge	6/13/86	1,000.00	1,000.00	O	CK	P
Mr. R. P. Barnes	10/05/86	1,000.00	1,000.00	LP	CK	G
Mr. Robert L. Barr, Jr.	6/30/86	125.00	125.00	O	DB	P
		125.00	125.00	O	DB	P
Mr. Frank Barron	1/23/86	250.00	250.00	O	DB	P
Mr. J. E. Barrow, Jr.	10/21/86	2,000.00	1,000.00	LP	CK	G
Mr. J. E. Barrow	12/15/86	1,500.00	1,500.00	O	CK	G
Mr. Chandler Barton	6/20/86	100.00	100.00	O	DB	P
Mr. Needham B. Bateman	9/26/86	1,000.00	350.00	LP	CK	G
	12/30/86	100.00	100.00	O	DB	G
Mr. Oliver C. Bateman	5/21/85	1,000.00	100.00	O	CK	P
	5/22/86	50.00	50.00	O	DB	P
Mr. K.F. Bates, Jr.	12/10/86	100.00	100.00	O	DB	G
Mr. Louis L. Battey, MD	12/20/85	1,000.00	1,000.00	O	CK	P
Ms. Anne Marie Baxter	10/04/86	1,000.00	1,000.00	LP	CK	G
Mr. John V. Beamer	6/24/86	275.00	275.00	O	DB	P
Mr. Thomas L. Beavers	6/30/86	125.00	125.00	O	DB	P
Mr. Leo V. Berger	10/28/86	2,000.00	1,000.00	LP	CK	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. John Treacy Beyer	10/01/86	2,000.00	1,000.00	O	CK	G
	10/01/86	500.00	500.00	LP	CK	G
Mr. Warren Bicknell, III	2/07/85	1,000.00	500.00	O	CK	P
	12/19/85	250.00	250.00	O	DB	P
	7/15/86	250.00	250.00	O	DB	P
Mr. Stanley F. Birch, Jr.	1/17/86	100.00	100.00	O	DB	P
	6/24/86	125.00	125.00	O	DB	P
Mr. James A. Bishop	3/18/85	250.00	250.00	O	DB	P
	2/04/86	100.00	100.00	O	DB	P
Mr. James H. Blanchard	6/19/86	250.00	250.00	O	DB	P
Mr. Ron Bloomingkemper	9/30/86	2,000.00	1,000.00	O	CK	G
	9/30/86	1,750.00	1,750.00	LP	CK	G
Mr. Clayton P. Boardman, Jr.	11/17/83	250.00	250.00	O	DB	P
	5/27/85	1,000.00	1,000.00	O	CK	P
Mr. John A. Boland, Jr.	6/06/85	1,000.00	500.00	O	CK	P
Mr. Carl Bolch, Jr.	6/05/85	1,000.00	1,000.00	O	CK	P
	7/24/86	1,000.00	1,000.00	O	CK	P
Mr. R.P. Bolton	6/01/86	500.00	500.00	O	DB	P
Mr. Robert I. Bondi	11/25/85	100.00	100.00	O	DB	P
	6/24/86	125.00	125.00	O	DB	P
Mr. Walter M. Boomershine	5/27/85	1,000.00	500.00	O	CK	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. James M. Boring, Jr.	12/02/85	250.00	250.00	O	DB	P
Mr. Kenneth E. Boring	5/20/85	1,000.00	1,000.00	O	DB	P
Mr. Edward E. Boshears	11/09/83	100.00	100.00	O	DB	P
	2/08/85	500.00	500.00	O	DB	P
	1/30/86	100.00	100.00	O	DB	P
Mrs. Wanda Boshears	12/19/86	150.00	150.00	O	DB	P
Mr. Carl M. Bouckaert	8/08/86	250.00	250.00	O	DB	P
Mr. Kenneth Bowes	12/09/85	1,000.00	1,000.00	O	CK	P
Mr. Inman Brandon	6/03/85	1,000.00	250.00	O	CK	P
	10/09/85	25.00	25.00	O	DB	P
	12/04/85	100.00	100.00	O	DB	P
	5/29/86	100.00	100.00	O	DB	P
	7/11/86	200.00	200.00	O	DB	P
Mr. Joe Brannen	6/30/86	1,000.00	1,000.00	O	DB	P
Mr. Peter Brassler	7/21/86	200.00	200.00	O	DB	P
Mr. D.W. Brooks	11/15/85	1,000.00	1,000.00	O	CK	P
Mr. William Brotherton, Jr.	1/17/86	100.00	100.00	O	DB	P
Mr. Fred Brown	10/14/86	250.00	250.00	O	DB	G
Mrs. Gary K. Brown	10/14/86	250.00	250.00	O	DB	G
Mr. Gary K. Brown	10/14/86	250.00	250.00	O	DB	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. James Brown, Jr.	10/14/86	250.00	250.00	O	DB	G
Mr. Robert P. Brubaker	5/30/85	1,000.00	250.00	O	CK	P
Mr. George Brumley	9/29/86	1,000.00	200.00	O	CK	G
Mr. Larry J. Bryan	11/04/86	1,000.00	1,000.00	O	DB	G
Mr. Marion R. Buisson	10/09/86	2,000.00	1,000.00	LP	CK	G
	10/09/86	500.00	500.00	O	CK	G
Mr. Ralph J. Buono	9/18/86	1,250.00	250.00	LP	CK	G
	9/18/86	300.00	300.00	O	CK	G
Col. Russell A. Burnett	5/20/85	1,000.00	25.00	O	CK	P
	11/12/85	100.00	100.00	O	DB	P
	12/04/85	100.00	100.00	O	DB	P
	3/25/86	50.00	50.00	O	DB	P
	5/19/86	500.00	500.00	O	DB	P
	6/26/86	50.00	50.00	O	DB	P
	6/16/86	125.00	125.00	O	DB	P
Mrs. Dorothy M. Burns	11/15/85	1,000.00	125.00	O	CK	P
	6/30/86	25.00	25.00	O	DB	P
Mr. R. Byrum	10/01/86	250.00	250.00	LP	CK	G
Mr. John R. Callahan	6/11/85	1,000.00	250.00	O	CK	P
Mr. Owen V. Campbell	1/31/86	1,000.00	300.00	O	CK	P
Mr. O.D. Carlton, II	8/22/85	2,000.00	1,000.00	O	CK	P
Mr. R.P.M. Carlson	6/27/86	750.00	250.00	O	DB	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Al Carter, Jr.	10/14/86	250.00	250.00	O	DB	G
Ms. Virginia Carter	10/14/86	250.00	250.00	O	DB	G
Mr. Rick Cash	10/14/86	250.00	250.00	O	DB	G
Mr. Rocky Cash	10/14/86	250.00	250.00	O	DB	G
Mr. James M. Caswell	10/10/84	500.00	500.00	O	DB	P
Mr. Alvin B. Cates, Jr.	10/31/83	250.00	250.00	O	DB	P
	1/08/86	100.00	100.00	O	DB	P
	1/14/86	100.00	100.00	O	DB	P
Mrs. Simone Center	10/27/86	100.00	100.00	O	DB	G
Mr. A. Russell Chandler	5/25/85	250.00	250.00	O	DB	P
Mr. Tom Chandler	8/12/86	1,000.00	250.00	O	CK	P
Mr. James R. Chaney	6/06/85	125.00	125.00	O	DB	P
Mr. R.M. Channell	10/03/86	2,500.00	1,500.00	O	DB	G
	10/13/86	300.00	300.00	O	DB	G
Mr. Keith Chappelle	10/03/86	1,000.00	1,000.00	LP	CK	G
Mr. J.B. Chastain, M.D.	4/08/85	1,000.00	50.00	O	CK	P
Mr. J. Howard Chatham	5/20/85	1,000.00	1,000.00	O	CK	P
Mr. Harvey M. Cheatham	10/29/86	1,000.00	1,000.00	O	CK	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Ben Cheek, III	6/30/86	125.00	125.00	O	DB	P
Mr. John A. Cheney	5/14/85	375.00	375.00	LP	CK	P
Mr. J. Donald Childress	5/15/85	2,250.00	1,250.00	O	CK	P
Ms. Martha J. Clapper	7/21/86	100.00	100.00 [4]	O	DB	P
Mr. Eugene M. Clary	5/28/85	500.00	500.00	O	DB	P
Mr. H.J. Cofer, Jr.	1/18/84	250.00	250.00	O	DB	P
Mrs. Jack Cofer	2/07/86	100.00	100.00	O	DB	P
Mr. Gerald Cohen	11/04/86	250.00	250.00	O	DB	G
	12/19/86	100.00	100.00	O	DB	G
Mr. Richard S. Colvin, M.D.	5/13/85	200.00	200.00	O	DB	P
Mr. John A. Conant	9/21/84	250.00	250.00	O	DB	P
	4/08/85	1,000.00	1,000.00	O	CK	P
	5/09/85	1,000.00	1,000.00	O	CK	P
Mrs. Miriam H. Conant	1/13/86	50.00	50.00	O	DB	P
Mr. Walter L. Conner	9/09/86	2,500.00	500.00	LP	CK	G
			1,000.00	O	CK	G
Cook and Company[5]	6/04/85	2,000.00	1,000.00	O	CK	P
	6/04/85	2,000.00	2,000.00	O	CK	P
	6/04/85	2,000.00	2,000.00	O	CK	P
Mr. Frederick Cooper	2/13/85	1,000.00	1,000.00	O	CK	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Lovick P. Corn	4/08/85	1,000.00	300.00	O	CK	P
	10/27/86	2,000.00	2,000.00	O	CK	G
Mr. John D. Corse	5/24/85	100.00	100.00	O	DB	P
	6/30/86	125.00	125.00	O	DB	P
Mr. Thomas G. Cousins	5/31/86	3,000.00	2,000.00	O	CK	P
Mr. Paul Coverdell	5/28/85	100.00	100.00	O	DB	P
	6/06/85	125.00	125.00	O	DB	P
Mr. Hubert C. Cranford	6/03/85	1,000.00	1,000.00	O	CK	P
Mr. James M. Crawford	6/30/86	250.00	250.00	O	DB	P
Mr. Keith M. Crawford	10/14/86	250.00	250.00	O	DB	G
Mr. Edward S. Croft, III	5/29/85	1,000.00	1,000.00	O	CK	P
Ms. Theresa C. Crossland	9/10/86	2,500.00	1,500.00	O	CK	G
Mr. Ray E. Crowley	6/12/84	1,000.00	500.00	O	CK	P
	1/23/86	250.00	250.00	O	CK	P
	5/12/86	750.00	750.00	O	CK	P
Mr. P.A. Dangar, Jr.	9/17/86	300.00	300.00	O	DB	G
Mr. Lloyd H. Darby, III	3/13/86	1,649.14	1,100.86	O	CK	P
	3/13/86	1,649.14	1,649.14	O	CK	P
Mr. John W. Dashler	9/09/86	1,000.00	100.00	O	CK	G
Mr. H.A. Davis	5/30/85	1,000.00	250.00	O	CK	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Roe J. Davis	5/30/85	1,000.00	200.00	O	CK	P
Mr. Eugene B. Dawson	6/09/82	250.00	250.00	O	DB	P
	5/28/85	1,000.00	1,000.00	O	CK	P
Mr. Paul J. Day	6/18/85	1,000.00	1,000.00	O	CK	P
Mrs. Violette Day	6/18/85	1,000.00	1,000.00	O	CK	P
Mr. J. Terry Dewberry	5/28/85	500.00	500.00	O	DB	P
Mr. Simone J. DiBella	10/14/86	1,000.00	150.00	O	CK	G
	10/14/86	250.00	250.00	O	DB	G
Mr. Frank F. Dineen	9/19/86	300.00	300.00	O	DB	G
	9/19/86	2,500.00	1,000.00	O	CK	G
			500.00	LP	CK	G
Mr. M.B. Dixon	5/23/83	1,000.00	1,000.00	O	DB	P
Mr. Richard M. Dolin	9/17/86	150.00	150.00	O	CK	G
	9/17/86	1,250.00	250.00	LP	CK	G
Mr. George F. Donovan	6/20/86	125.00	125.00	O	DB	P
Mr. Anthony Dorsey	10/14/86	1,000.00	600.00	O	DB	G
	10/14/86	250.00	250.00	O	DB	G
Dr. Clem M. Doxey	6/01/85	1,000.00	200.00	O	CK	P
Mr. Harry I. Driggers	6/03/85	1,000.00	500.00	O	CK	P
Mr. J. Roy Duggan	11/07/83	1,000.00	100.00	O	DB	P
	5/29/85	1,000.00	1,000.00	O	CK	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Ken E. Edwards, Jr.	5/20/85	250.00	250.00	O	DB	P
	5/20/85	100.00	100.00	O	DB	P
Mr. Odell Edwards	7/31/86	100.00	100.00	O	DB	P
Mr. J.D. Ensor	9/16/86	1,250.00	250.00	LP	CK	G
Ms. Lucille Muller Ensor	9/16/86	1,250.00	250.00	LP	CK	G
Mr. T.W. Erickson	7/17/86	200.00	200.00	O	DB	P
Mr. William W. Espy	11/03/86	1,000.00	625.00	O	CK	G
Ms. Carol Falcone	9/23/86	2,500.00	1,800.00	O	CK	G
Mr. J. Wilbur Feighner	4/08/85	1,000.00	300.00	O	CK	P
	9/27/85	100.00	100.00	O	DB	P
	12/06/85	100.00	100.00	O	DB	P
Mr. Robert H. Ferst	7/24/86	500.00	500.00	O	DB	P
Mr. William A. Fickling, Sr.	9/23/85	100.00	100.00	O	DB	P
Mr. William A. Fickling, Jr.	6/05/85	1,000.00	1,000.00	O	CK	P
	6/05/85	1,000.00	1,000.00	O	CK	P
Mr. Greg Fitzpatrick	10/14/86	250.00	250.00	O	DB	G
Mrs. Sharon Fitzpatrick	10/14/86	250.00	250.00	O	DB	G
Mr. J. Sidney Flowers	7/15/86	200.00	200.00	O	DB	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Langdon S. Flowers	2/07/85	1,000.00	100.00	O	CK	P
	2/06/86	100.00	100.00	O	DB	P
	3/06/86	500.00	500.00	O	DB	P
Mr. Randy J. Folsom	5/20/85	100.00	100.00	O	DB	P
	10/30/85	100.00	100.00	O	DB	P
	5/10/86	100.00	100.00	O	CK	P
	7/19/86	100.00	100.00	O	CK	P
Mr. Morton G. Forbes	1/21/86	250.00	250.00	O	DB	P
Mr. Hugh Fowler	5/28/85	1,000.00	500.00	O	CK	P
Mr. James B. Franklin	5/28/85	1,000.00	550.00	O	CK	P
	11/26/85	250.00	250.00	O	DB	P
Mr. Hirsch Friedman	12/31/85	100.00	100.00	O	DB	P
Ms. Judy Gallagher	12/04/85	100.00	100.00	O	DB	P
Mr. Donald Gammon	6/05/85	1,000.00	750.00	O	CK	P
Mr. L.H. Garrett	7/22/85	1,000.00	1,000.00	O	CK	P
Mr. Randy Garrett	10/14/86	250.00	250.00	LP	DB	G
Mrs. Randy Garrett	10/14/86	250.00	250.00	LP	DB	G
Mr. W.A. Fred Gassaway, Jr.	10/23/85	1,000.00	300.00	O	CK	P
Mr. W.W. Gaston	6/30/86	125.00	125.00	O	DB	P
Mr. Earl F. Geiger	11/04/86	1,500.00	500.00	O	CK	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. P.H. Giddens	10/27/86	500.00	500.00	O	DB	G
Mr. Randy Gillespie	9/17/86	250.00	250.00	LP	CK	G
Mr. Kenny Gilmore	10/14/86	1,000.00	150.00	O	DB	G
	10/14/86	250.00	250.00	O	DB	G
Mrs. Marcy Godfrey	10/14/86	250.00	250.00	O	DB	G
Mr. Randall S. Godfrey	10/14/86	1,000.00	300.00	O	DB	G
	10/14/86	250.00	250.00	O	DB	G
Mr. Henry M. Goodyear	11/01/83	100.00	100.00	O	DB	P
	7/06/84	200.00	200.00	O	DB	P
	6/04/85	125.00	125.00	O	DB	P
	9/20/85	200.00	200.00	O	DB	P
	1/01/86	100.00	100.00	O	DB	P
	2/10/86	100.00	100.00	O	DB	P
	3/27/86	175.00	175.00	O	DB	P
Mr. J.L. Gray	9/26/86	1,000.00	250.00	O	CK	G
Mr. Hiram E. Greer	5/27/85	1,000.00	250.00	O	CK	P
Mr. Calvin T. Griffith	5/28/85	1,000.00	250.00	O	CK	P
	1/29/86	100.00	100.00	O	DB	P
Mr. Jerry C. Grimsley	10/10/86	75.00	75.00	O	DB	G
	10/16/86	75.00	75.00	O	DB	G
Mrs. William H. Guild	9/02/86	1,000.00	1,000.00	O	DB	G
Mr. Richard A. Guthman, Jr.	11/19/85	25.00	25.00	O	DB	P
	5/29/86	500.00	500.00	O	DB	P
Mr. Jack O. Guy	11/04/86	200.00	200.00	O	DB	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type1/	Excessive Source2/	Elec. Des.3/
Mr. John W. Hall ,Jr.	10/06/86	1,000.00	400.00	O	CK	G
Mr. William B. Hall	8/08/86	100.00	100.00	O	DB	P
Mr. Thomas J. Halpin	9/15/86	2,500.00	500.00	LP	CK	G
			1,000.00	O	CK	G
Dr. Daniel Hanks, Jr.	5/27/85	1,000.00	250.00	O	CK	P
	11/26/85	100.00	100.00	O	DB	P
	1/23/86	250.00	250.00	O	DB	P
	1/31/86	100.00	100.00	O	DB	P
	7/15/86	100.00	100.00	O	DB	P
Mr. George R. Hanlon	12/10/85	1,000.00	1,000.00	O	CK	P
Mr. Frank J. Hanna, Jr.	11/04/85	1,000.00	1,000.00	O	CK	P
Mr. C. Edward Hansell	10/31/83	500.00	500.00	O	DB	P
	11/13/85	500.00	500.00	O	DB	P
Mr. D. Scott Hanson	11/04/86	750.00	750.00	O	DB	G
Mr. John M. Harbert, III	8/19/86	2,000.00	1,000.00	O	CK	G
Mr. David P. Harbin	11/04/86	2,000.00	1,000.00	O	CK	G
Mr. B.H. Hardaway, III	12/04/85	100.00	100.00	O	DB	P
Mr. Allen S. Hardin	1/24/86	400.00	400.00	O	DB	P
Mrs. Margaret Hardin	6/30/86	250.00	250.00	O	DB	P
Mr. N.A. Hardin	10/13/86	150.00	150.00	O	DB	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Robert R. Harlin	6/03/85	1,000.00	1,000.00	O	CK	P
Mrs. Margaret Harper	10/14/86	250.00	250.00	O	DB	G
Mr. Tim Harper	10/14/86	1,000.00	120.00	O	DB	G
	10/14/86	250.00	250.00	O	DB	G
Mr. Robert V. Harrison	9/18/86	1,250.00	250.00	LP	CK	G
Ms. Doris N. Harrison	9/18/86	1,250.00	250.00	LP	CK	G
Mrs. Berti Hartman	10/14/86	250.00	250.00	O	DB	G
Mr. Doug Hartman	10/14/86	250.00	250.00	O	DB	G
Mr. K. W. Hartzog	6/04/85	2,000.00	1,000.00	O	CK	P
Mr. Thomas S. Hartzog	5/30/85	3,000.00	2,000.00	O	CK	P
	6/04/85	1,000.00	1,000.00	O	CK	P
	12/23/85	100.00	100.00	O	DB	P
	5/12/86	100.00	100.00	O	DB	P
	7/11/86	50.00	50.00	O	DB	P
Mr. J. S. Hatfield	2/07/85	1,000.00	1,000.00	O	CK	P
Mrs. J.S. Hatfield	5/31/85	1,000.00	1,000.00	O	CK	P
Mrs. Wayne A. Hawk	10/14/86	325.00	325.00	O	DB	G
Mr. Wayne A. Hawk	10/14/86	325.00	325.00	O	DB	G
Mrs. Melita E. Hayes	11/15/85	2,000.00	1,000.00	O	CK	P
	6/24/86	125.00	125.00	O	DB	P
	10/02/86	2,500.00	1,500.00	O	CK	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mrs. Dan Haygood, Jr.	9/15/86	1,065.00	65.00	O	CK	G
Mr. Gary Hazen	9/19/86	1,250.00	250.00	LP	CK	G
Mrs. Linda Hazen	9/19/86	1,250.00	250.00	LP	CK	G
Mrs. L.E. Heil	10/14/86	250.00	250.00	O	DB	G
Mr. L.E. Heil	10/14/86	250.00	250.00	O	DB	G
Mr. Kent Henderson	10/14/86	250.00	250.00	O	DB	G
Mr. Walter B. Hendry	6/03/85	1,000.00	1,000.00	O	DB	P
Mr. James R. Hewell, Jr.	5/20/85	1,000.00	200.00	O	CK	P
Mr. Guy F. Hill, Sr.	5/20/85	1,000.00	1,000.00	O	CK	P
Mr. Robert M. Holder	6/03/85	1,000.00	250.00	O	CK	P
Ms. Lisa D. Holm	9/19/86	1,250.00	250.00	LP	CK	G
Mr. Monte Holm	9/19/86	1,250.00	250.00	LP	CK	G
Mr. William E. Honey, Sr.	5/29/85	1,000.00	650.00	O	CK	P
	6/19/85	350.00	350.00	O	DB	P
Mr. D. S. Hudgens	10/08/84	1,000.00	100.00 [6]	O	CK	P
	4/29/85	500.00	500.00	O	DB	P
	5/30/85	400.00	400.00	O	DB	P
Mr. Roy Huffington	10/16/86	500.00	500.00	O	DB	G
Mrs. Janice Huffman	10/14/86	250.00	250.00	O	DB	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Josh Huffman	10/06/86	1,000.00	300.00	O	CK	G
	10/14/86	250.00	250.00	O	DB	G
Mr. S. Hubert Humphrey, Jr.	9/18/86	1,250.00	250.00	LP	CK	G
Ms. Norma P. Humphrey	9/18/86	1,250.00	250.00	LP	CK	G
Mr. Mark D. Hurst	10/30/86	3,000.00	2,000.00	O	CK	G
Ms. Susan D. Hurst	4/18/86	4,000.00	3,000.00	O	CK	P
Mr. J. E. Imhoff	12/30/85	1,000.00	500.00	O	CK	P
Mr. Russell Ingleright	10/14/86	250.00	250.00	O	DB	G
Mrs. Georgette Ingleright	10/14/86	250.00	250.00	O	DB	G
Mr. R.L. Ireland, III	4/21/86	100.00	100.00	O	DB	P
Mr. Johnny Isakson	5/22/85	1,000.00	250.00	O	CK	P
Mr. A. Jalil	5/31/85	2,000.00	1,100.00	O	CK	P
Mr. Kort D. Jensen	9/17/86	150.00	150.00	O	CK	G
	9/17/86	1,250.00	250.00	LP	CK	G
Mr. Jacob S. Jernigan	9/26/86	2,500.00	500.00	LP	CK	G
			1,000.00	O	CK	G
Mrs. April Johansson	10/14/86	250.00	250.00	O	DB	G
Mr. Ove Johansson	10/14/86	250.00	250.00	O	DB	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type 1/	Excessive Source 2/	Elec. Des. 3/
Mr. Al Johnson	6/06/85	1,000.00	1,000.00	O	DB	P
Mr. Huey L. Johnson	9/25/86	1,000.00	100.00	O	CK	G
Ms. Shirley L. Johnson	5/13/86	100.00	100.00	O	DB	P
	5/14/86	100.00	100.00	O	DB	P
Mr. Billy N. Jones	1/30/86	100.00	100.00	O	DB	P
Mr. Billy R. Jones	6/03/85	100.00	100.00	O	DB	P
Mr. Charles M. Jones	10/25/85	1,000.00	500.00	O	CK	P
Mr. Frank C. Jones	5/24/85	507.81	507.81	O	DB	P
	3/25/86	75.00	75.00	O	DB	P
	4/28/86	417.19	417.19	O	DB	P
Mr. Richard M. Jones	6/05/85	1,000.00	50.00	O	CK	P
	6/30/86	125.00	125.00	O	DB	P
Mr. Jordan P. Jung	4/27/85	250.00	250.00	O	DB	P
	5/30/85	500.00	500.00	O	DB	P
	5/30/85	250.00	250.00	O	DB	P
Mr. Ara F. Kalpak	10/14/86	250.00	250.00	O	DB	G
Mrs. Dee Kalpak	10/14/86	250.00	250.00	O	DB	G
Mr. John B. Keeble	7/10/86	2,000.00	2,000.00	O	CK	P
Mr. S.D. Keen	5/31/85	1,000.00	25.00	O	CK	P
	9/24/85	25.00	25.00	O	DB	P
	11/26/85	100.00	100.00	O	DB	P
	2/07/86	100.00	100.00	O	DB	P
Mr. Eugene Kelly	5/21/85	1,500.00	500.00	O	CK	P
	6/24/86	2,000.00	2,000.00	O	CK	P
	6/24/86	500.00	500.00	O	CK	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Charles Kemp, Jr.	6/03/85	100.00	100.00	O	DB	P
	1/28/86	100.00	100.00	O	DB	P
	4/10/86	50.00	50.00	O	DB	P
	8/04/86	100.00	100.00	O	DB	P
Mr. A.T. Kennedy	10/31/83	500.00	500.00	O	DB	P
	5/17/85	1,000.00	1,000.00	O	CK	P
	10/31/85	500.00	500.00	O	DB	P
Ms. Claire A. King	9/30/86	2,000.00	1,000.00	O	CK	G
	9/30/86	500.00	500.00	LP	CK	G
	11/01/86	750.00	750.00	O	DB	G
Mr. Michael J. King	9/18/86	1,250.00	250.00	LP	CK	G
	9/18/86	150.00	150.00	O	CK	G
Mr. Carl W. Knobloch	5/17/85	1,000.00	1,000.00	O	CK	P
Mr. P. S. Knox, Jr.	5/28/85	3,000.00	2,000.00	O	CK	P
Mr. C. Robert Koon	6/04/85	1,000.00	750.00	O	CK	P
Ms. Marianne Kooymans	11/01/86	2,000.00	1,000.00	LP	CK	G
Mr. Jordan J. Kreiner	10/04/86	1,000.00	1,000.00	LP	CK	G
Mr. Max L. Kuniansky	11/02/83	1,000.00	1,000.00	O	DB	P
Mr. Andrew Gay Labrot	5/15/85	2,000.00	1,500.00	O	CK	P
	4/22/86	200.00	200.00	O	DB	P
	9/12/86	1,200.00	200.00	O	CK	G
	10/28/86	100.00	100.00	O	DB	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Jerry D. Lancaster	8/19/86	1,000.00	1,000.00	O	CK	G
Mr. A.J. Land, Jr.	5/23/85	1,000.00	500.00	O	CK	P
Mr. Willard Lasseter	5/24/85	1,000.00	700.00	O	CK	P
	1/14/86	1,000.00	1,000.00	O	CK	P
	4/23/86	150.00	150.00	O	DB	P
	6/17/86	150.00	150.00	O	DB	P
Mr. Julian LeCraw	6/25/85	1,000.00	1,000.00	O	CK	P
Mrs. Julian LeCraw	6/24/86	50.00	50.00	O	DB	P
Mr. William F. Ledford	6/15/85	350.00	350.00	O	DB	P
	7/21/86	200.00	200.00	O	DB	P
Mr. G.C. Lee	8/20/86	25.00	25.00	O	DB	G
	10/01/86	475.00	475.00	O	DB	G
	10/27/86	500.00	500.00	O	DB	G
Mr. John J. Lee	6/04/85	1,375.00	375.00	O	CK	P
	6/05/85	125.00	125.00	O	CK	P
	4/04/86	75.00	75.00	O	DB	P
Mr. Donald M. Leebern, Jr.	4/08/85	1,000.00	1,000.00	O	CK	P
Mr. C.M. Leger	5/23/83	1,000.00	1,000.00	O	DB	P
	5/28/85	1,000.00	1,000.00	O	CK	P
Mr. John N. Lemasters	9/29/86	1,000.00	250.00	O	CK	G
Mr. James R. Leonard, MD	5/10/85	1,000.00	300.00	O	CK	P
Dr. Bernard Lerman, M.D.	5/12/85	1,000.00	550.00	O	CK	P

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Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Ronald S. Leventhal	5/15/85	1,000.00	500.00	O	CK	P
	5/27/85	1,250.00	1,250.00	O	CK	P
	5/21/86	1,000.00	1,000.00	O	CK	P
	7/01/86	1,000.00	1,000.00	O	CK	P
Mrs. Deanne D. Levison	6/04/85	1,000.00	1,000.00	O	CK	P
Mr. S. Jarvin Levison	5/12/83	1,000.00	1,000.00 [6]	O	DB	P
Mrs. JaDon M. Levy	5/20/85	100.00	100.00	O	DB	P
Mr. J.C. Lewis, Jr.	2/11/85	250.00	250.00	O	DB	P
	5/18/85	100.00	100.00	O	DB	P
	6/04/85	500.00	500.00	O	DB	P
Ms. Linda R. Lindner	9/15/86	1,250.00	250.00	LP	CK	G
	9/16/86	150.00	150.00	O	CK	G
Mr. Steven J. Little	9/22/86	1,250.00	250.00	LP	CK	G
Mr. Tom Lloyd	1/16/85	1,000.00	100.00	O	CK	P
Mr. Clay C. Long	5/20/85	1,000.00	1,000.00	O	CK	P
Mrs. Eleanor S. Longcamp	1/24/86	200.00	200.00	O	DB	P
	5/07/86	200.00	200.00	O	DB	P
Mr. Charles A. Lotz, Jr.	6/03/85	2,500.00	1,500.00 [7]	O	CK	P
Mr. Robert C. Loudermilk	11/06/85	1,000.00	1,000.00	O	CK	P
Mr. Frank Love, Jr.	11/02/83	250.00	250.00	O	DB	P
	5/28/85	1,000.00	1,000.00	O	CK	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. John David Lowenberg	5/23/85	1,250.00	250.00	O	CK	P
	6/09/86	500.00	500.00	O	DB	P
Mr. Albert L. Luce, Jr.	11/01/83	1,000.00	300.00	O	DB	P
	5/22/85	1,000.00	1,000.00 [8]	O	CK	P
Mr. George E. Luce	11/01/83	200.00	200.00	O	DB	P
	5/23/85	1,000.00	1,000.00	O	CK	P
	5/29/85	100.00	100.00	O	DB	P
Mr. Joseph P. Luce	5/29/85	100.00	100.00	O	DB	P
	12/02/85	750.00	750.00	O	DB	P
	6/03/86	150.00	150.00	O	DB	P
Mrs. Edward J. Maguire	10/14/86	250.00	250.00	O	DB	G
Mr. Edward J. Maquire	10/14/86	250.00	250.00	0	DB	G
Mr. Cecil C. Malone, Jr.	11/14/85	1,000.00	250.00	O	CK	G
Mr. E.W. Mann, Jr.	6/05/85	125.00	125.00	O	DB	P
Mr. William W. Marett, Jr.	5/28/85	1,000.00	25.00	O	CK	P
Ms. Glesca Marshall	10/27/86	950.00	950.00	O	DB	G
Mr. Murray Stewart Marshall	1/07/86	250.00	250.00	O	DB	P
	7/01/86	250.00	250.00	O	DB	P
Mr. George J. Martonik	9/15/86	2,500.00	500.00	LP	CK	G
			1,000.00	O	CK	G
Mr. James D. Mason	11/19/85	250.00	250.00	O	DB	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Wayne H. Mason	11/21/85	250.00	250.00	O	DB	P
Mr. Kent E. Mast	2/12/86	200.00	200.00	O	DB	P
	8/11/86	50.00	50.00	O	DB	P
Mr. T. Harvey Mathis	8/06/85	1,000.00	1,000.00	O	DB	P
Mr. Patrick J. McGahan	5/30/85	250.00	250.00	O	DB	P
	10/01/86	1,000.00	750.00	O	CK	G
Mr. Donald A. McMahon	5/28/85	1,000.00	1,000.00	O	CK	P
Mr. Tim McMahon	10/14/86	250.00	250.00	O	DB	G
Mr. Todd McMahon	9/15/86	2,500.00	1,500.00	O	CK	G
Ms. Arina J. Meeuwsen	11/04/86	2,000.00	1,000.00	O	CK	G
Mr. William C. Meredith, Jr.	2/12/86	100.00	100.00	O	DB	P
Mr. James T. Meyer	10/14/86	250.00	250.00	O	DB	G
Mrs. James T. Meyer	10/14/86	250.00	250.00	O	DB	G
Mr. Kirk D. Miles	9/19/86	1,250.00	250.00	LP	CK	G
Mr. Jeff Miles	9/19/86	1,250.00	250.00	O	CK	G
Mr. James B. Miller, Jr.	5/31/85	1,000.00	1,000.00	O	CK	P
Ms. Jane A. Miller	10/01/86	500.00	500.00	O	CK	G
	10/01/86	2,000.00	1,000.00	O	CK	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mrs. James D. Millican	11/26/85	200.00	200.00	O	DB	P
Mr. Guy W. Millner	5/23/85	1,000.00	1,000.00	O	DB	P
Ms. Judith A. Millner	5/22/86	500.00	500.00	O	DB	P
Mr. Jack Mills	2/04/86	100.00	100.00	O	DB	P
	7/17/86	200.00	200.00	O	DB	P
Mr. A. Minis, Jr.	2/27/84	100.00	100.00	O	DB	P
	5/15/85	1,000.00	1,000.00	O	CK	P
Mr. James E. Minor	9/17/86	150.00	150.00	O	CK	G
	9/17/86	1,250.00	250.00	LP	CK	G
Mr. John O. Mitchell	11/18/85	1,000.00	1,000.00	O	CK	P
Mr. Billy P. Mixon, CLU	12/10/85	1,000.00	1,000.00	O	DB	P
Ms. Sara Giles Moore	5/15/85	1,000.00	1,000.00	O	CK	P
Mr. George S. Morgan	6/17/86	125.00	125.00	O	DB	P
Mr. James L. Morgan, III	11/01/86	900.00	900.00	O	DB	G
Dr. Steven L. Morganstern, M.D.	5/13/85	1,000.00	300.00	O	CK	P
Mr. Armond C. Morris	11/15/85	1,000.00	100.00	O	CK	P
	8/04/86	100.00	100.00	O	DB	P
Mr. Dillard Munford	4/11/85	1,000.00	500.00	O	CK	P
	6/16/86	125.00	125.00	O	DB	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. R. Danny Murray	9/16/86	2,500.00	1,000.00	O	CK	G
			500.00	LP	CK	G
	9/22/86	600.00	600.00	O	DB	G
	10/01/86	375.00	375.00	O	DB	G
Mr. Albert G. Norman, Jr.	2/12/85	100.00	100.00	O	DB	P
Dr. Charles W. Norwood	11/26/85	100.00	100.00	O	DB	P
Mr. Wade L. O'Neal	12/10/86	100.00	100.00	O	DB	G
Mr. William R. Olive, Jr.	9/19/86	1,250.00	250.00	LP	CK	G
Mr. W.A. Orender	9/15/86	2,500.00	1,000.00	O	CK	G
			500.00	LP	CK	G
Ms. Paula L. Osborne	5/30/85	1,000.00	1,000.00	O	CK	P
Dr. William W. Osborne	4/24/86	100.00	100.00	O	DB	P
Dr. C. Lamont Osteen	4/24/86	100.00	100.00	O	DB	P
Mr. John L. Padgett	5/14/86	250.00	250.00	O	DB	P
	8/11/86	100.00	100.00	O	DB	P
Mr. Albert N. Parker	5/20/85	100.00	100.00	O	CK	P
		125.00	125.00	O	DB	P
Ms. Diane W. Parker	10/01/83	1,000.00	1,000.00	O	DB	P
Mr. William A. Parker, Jr.	5/10/85	1,000.00	550.00	O	CK	P
	7/22/85	450.00	450.00	O	DB	P
Mr. Dave Parrish	5/16/85	1,000.00	1,000.00	O	CK	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type1/	Excessive Source2/	Elec. Des.3/
Mr. C.L. Patrick	6/09/83	1,000.00	1,000.00	O	DB	P
	5/23/85	1,000.00	1,000.00	O	CK	P
	6/03/85	1,000.00	1,000.00	O	CK	P
Mr. J.V. Patton	10/31/86	2,000.00	1,000.00	LP	CK	G
Ms. Marie B. Patton	10/31/86	1,000.00	1,000.00	O	CK	G
Mr. Thomas V. Patton	5/15/85	1,000.00	1,000.00	O	DB	P
	10/31/86	2,000.00	1,000.00	LP	CK	G
Mr. Gary Payne	9/15/86	2,000.00	1,000.00	LP	CK	G
Mr. William B. Pendleton	5/30/85	1,000.00	250.00	O	CK	P
Mr. G.O. Persons, II	5/26/85	500.00	500.00	O	DB	P
Mr. Oscar N. Persons	2/18/85	150.00	150.00	O	DB	P
	5/21/85	250.00	250.00	O	DB	P
	6/20/86	250.00	250.00	O	DB	P
Mr. Bryce Peterson	10/01/86	2,000.00	1,000.00	O	CK	G
	10/01/86	500.00	500.00	LP	CK	G
Mr. David I. Peterson	10/24/85	100.00	100.00	O	DB	G
Mr. Parker H. Petit	6/24/86	250.00	250.00	O	DB	P
Mr. John D. Pezold	12/02/85	250.00	250.00	O	DB	P
Mr. Roscoe Pickett	10/31/86	2,000.00	1,000.00	O	CK	G
Mr. W. Hayes Pickett, Jr.	10/24/86	25.00	25.00	O	DB	G

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Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. John F. Pidcock	7/21/86	100.00	100.00	O	DB	P
Mr. Paul Zane Pilzer	10/16/86	1,000.00	1,000.00	O	DB	G
Mr. Richard E. Pittman	1/17/85	250.00	250.00 [6]	O	DB	P
	6/23/86	600.00	600.00	O	DB	P
Mr. Alec L. Poitevint, II	5/28/85	1,000.00	100.00	O	CK	P
Mr. Loyd Poitevint	6/01/86	100.00	100.00	O	DB	P
Mrs. Carol Polzin	10/14/86	250.00	250.00	O	DB	G
Mr. Dale Polzin	10/14/86	250.00	250.00	O	DB	G
Mr. James P. Poole	6/26/86	150.00	150.00	O	DB	P
Mr. Mark C. Pope, III	6/30/86	500.00	500.00	O	DB	P
Mr. William G. Pritchard, Jr.	6/24/86	625.00	625.00	O	DB	P
Mr. William R. Probst	1/30/86	50.00	50.00	O	DB	P
Mr. James G. Raines	10/16/85	1,000.00	200.00	O	CK	P
Mr. Claude Rainwater	6/04/85	1,250.00	250.00	O	CK	P
Mr. Forrest L. Ramser	5/18/85	1,000.00	275.00	O	CK	P
	12/04/85	50.00	50.00	O	DB	P
	1/29/86	100.00	100.00	O	DB	P
Mr. Edmond H. Randle	9/16/86	1,250.00	250.00	LP	CK	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Ms. Barbara Randle	9/16/86	1,250.00	250.00	LP	CK	G
Mr. Troy D. Ratcliff	9/17/86	1,250.00	150.00	O	CK	G
			250.00	LP	CK	G
Mr. Richard L. Reagan	10/09/86	250.00	250.00	O	CK	G
Mr. Dale W. Reese	10/14/86	250.00	250.00	O	DB	G
Mr. Fred Kent Rhoden	12/31/85	1,000.00	1,000.00	O	DB	P
Mrs. Beverly Ribaudo	10/14/86	250.00	250.00	O	DB	G
Mr. Santo Ribaudo	10/14/86	250.00	250.00	O	DB	G
Mr. Dean Edwin Rice	7/15/86	100.00	100.00	O	DB	P
	7/31/86	100.00	100.00	O	DB	P
Mr. Pinckley K. Ridley	9/19/86	1,250.00	250.00	LP	CK	G
Ms. Carol S. Ridley	9/19/86	1,250.00	250.00	LP	CK	G
Mr. Don R. Roberts, Jr. MD	2/08/85	500.00	500.00	O	DB	P
	2/04/86	40.00	40.00	O	DB	P
	6/30/86	200.00	200.00	O	DB	P
Mr. E. Xavier Roberts	1/15/86	1,000.00	1,000.00	O	CK	P
Mr. Edgar Roberts	6/05/85	1,000.00	250.00	O	CK	P
Mr. Joe W. Rogers, Jr.	5/28/85	1,000.00	1,000.00	O	DB	P
	6/12/86	1,000.00	1,000.00	O	CK	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. John M. Roig	9/15/86	2,500.00	500.00	LP	CK	G
			1,000.00	O	CK	G
	9/23/86	150.00	150.00	O	CK	G
Mr. Gary W. Rollins	5/17/85	1,000.00	1,000.00	O	CK	P
	11/07/85	1,000.00	1,000.00	O	CK	P
Mr. R. Randall Rollins	7/08/86	125.00	125.00	O	DB	P
Dr. Donald W. Rooker	2/27/86	50.00	50.00	O	DB	P
Mr. W.A. Roquemore	5/24/85	1,000.00	250.00	O	CK	P
Mr. Robert Safford	10/14/86	250.00	250.00	O	DB	G
Mrs. Robert Safford	10/14/86	250.00	250.00	O	DB	G
Mr. Don W. Sands	6/30/86	125.00	125.00	O	DB	P
Mr. Dennis Schechter	9/16/86	2,500.00	500.00	LP	CK	G
			1,000.00	O	CK	G
Schwall & Heuett	6/12/86	1,250.00	250.00	O	CK	P
Mr. Roger D. Semerad	2/14/85	1,000.00	250.00	O	CK	P
Mrs. Michael Sharpe	10/14/86	250.00	250.00	O	DB	G
Mr. Michael Sharpe	10/14/86	250.00	250.00	O	DB	G
Mrs. Steven Sharpe	10/14/86	250.00	250.00	O	DB	G
Mr. Steven Sharpe	10/14/86	250.00	250.00	O	DB	G

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Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Gary G. Shelby	1/06/86	100.00	100.00	O	DB	P
Mr. William Clyde Shephard, Jr.	5/31/85	1,000.00	1,000.00	O	CK	P
Mr. Clifton A. Sherwood	9/11/86	2,000.00	1,000.00	O	CK	G
Mr. William Sherwood	9/11/86	2,000.00	1,000.00	O	CK	G
Mr. W.L. Shirley	6/04/85	2,000.00	1,050.00	O	CK	P
Mr. D.R. Simmons, Jr.	6/01/86	300.00	300.00	O	DB	P
Mr. Harold Simmons	8/18/86	1,000.00	1,000.00	O	CK	G
Mr. John M. Simmons	6/03/85	1,000.00	25.00	O	CK	P
	6/01/86	300.00	300.00	O	DB	P
Ms. Cyndae A. Sims	5/31/85	1,500.00	500.00	O	CK	P
Dr. Marvin Skelton	6/09/85	100.00	100.00	O	DB	P
Mr. Alex W. Smith	5/20/85	1,000.00	100.00	O	CK	P
Mr. Earl E. Smith	5/30/85	500.00	500.00	O	DB	P
Mr. Fred Smith, Jr.	10/16/86	1,000.00	1,000.00	O	DB	G
Mr. James E. Smith	2/01/85	1,000.00	250.00	O	CK	P
Mr. Mike Smith	11/27/84	1,000.00	1,000.00	O	DB	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Peter A. Smith	2/15/85	250.00	250.00	O	DB	P
	2/04/86	20.00	20.00	O	DB	P
Mr. Rankin M. Smith	6/20/85	200.00	200.00	O	DB	P
	7/18/85	1,000.00	1,000.00	O	CK	P
The Honorable W. Armstrong Smith	5/24/85	1,000.00	500.00	O	CK	P
	10/01/85	300.00	300.00	O	DB	P
	8/12/86	200.00	200.00	O	DB	P
Mr. John Smithson	9/17/86	1,250.00	250.00	LP	CK	G
	9/17/86	150.00	150.00	O	CK	G
Mr. Thomas Spiegel	5/27/86	2,000.00	1,000.00	O	CK	G
Mr. Krisha V. Srinivasa	5/21/85	200.00	200.00	O	DB	P
Mr. John Stabler	10/01/85	200.00	200.00	O	DB	P
	2/12/86	250.00	250.00	O	DB	P
Mr. W.C. Starling	6/05/85	1,000.00	300.00	O	CK	P
	12/04/85	100.00	100.00	O	DB	P
	4/04/86	100.00	100.00	O	DB	P
	7/31/86	100.00	100.00	O	DB	P
Mr. Winburn E. Stewart, Jr.	5/29/86	25.00	25.00	O	DB	P
	7/07/86	100.00	100.00	O	DB	P
	7/10/86	1,000.00	1,000.00	O	CK	P
Mr William M. Street	5/22/86	1,500.00	500.00	O	CK	G
Mr. Frank B. Strickland	6/30/86	125.00	125.00	O	DB	P
Mr. Gene Stuckey	5/30/85	1,000.00	500.00	O	CK	P
	6/24/85	500.00	500.00	O	DB	P

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Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. John M. Stuckey, Jr.	11/26/84	500.00	500.00	O	DB	P
	5/20/85	1,000.00	1,000.00	O	CK	P
Mr. Dan L. Tatum	6/30/86	125.00	125.00	O	DB	P
Mr. R.L. Taylor, Jr.	8/04/86	40.00	40.00	O	DB	P
Mrs. Cynthia Thawley	9/17/86	3,750.00	2,750.00	O	CK	G
	9/17/86	150.00	150.00	O	CK	G
Mr. Paul F. Thiele	9/05/85	150.00	150.00	O	DB	P
	7/17/86	100.00	100.00	O	DB	P
Mr. Barron Thomas	10/20/86	2,000.00	1,000.00	O	CK	G
Mr. Gillis Thomas	7/15/86	100.00	100.00	O	DB	P
Mr. Roy Thompson	11/15/86	500.00	500.00	O	CK	P
Mr. Randolph W. Thrower	5/20/85	1,000.00	100.00	O	CK	P
Mr. William Timmons	2/11/85	1,000.00	750.00	O	CK	P
	2/21/85	1,000.00	1,000.00	O	CK	P
Mr. J. Lloyd Tomer	9/16/86	2,500.00	500.00	LP	CK	G
			1,000.00	O	CK	G
Mr. Maurice J. Towery	11/01/83	1,000.00	1,000.00	O	DB	P
	5/29/85	1,000.00	1,000.00	O	CK	P
Mr. M.L. Tracy	4/08/85	1,000.00	750.00	O	CK	P
	1/29/86	250.00	250.00	O	DB	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Herbert S. Traub, Jr.	7/08/86	500.00	200.00	O	DB	P
Ms. Shirley M. Treadwell	12/09/85	100.00	100.00	O	DB	P
	6/23/86	50.00	50.00	O	DB	P
Mr. John B. Trotter	7/15/86	200.00	200.00	O	DB	P
Mr. Robert Lee Turley	9/16/86	2,500.00	500.00	LP	CK	G
			1,000.00	O	CK	G
Mr. W.B. Turner	3/22/85	1,000.00	750.00	O	CK	P
	9/30/86	1,000.00	250.00	O	CK	G
Mr. Mike Tuttle	10/14/86	250.00	250.00	O	DB	G
Mrs. Mike Tuttle	10/14/86	250.00	250.00	O	DB	G
Mr. Michael R. Utz	9/17/86	2,500.00	500.00	LP	CK	G
			1,000.00	O	CK	G
Mr. Burkett VanKirk	7/25/86	2,000.00	1,000.00	O	CK	G
Mr. W.C. Vereen, Jr.	1/29/86	100.00	100.00	O	DB	P
	4/15/86	500.00	500.00	O	DB	P
Mr. Philip Volpe	10/14/86	250.00	250.00	O	DB	G
	10/14/86	1,000.00	150.00	O	DB	G
Mr. LaFayette Walker	11/01/86	2,000.00	1,000.00	O	CK	G
		500.00	500.00	LP	CK	G
Mr. Randall Walker	9/19/86	2,500.00	1,000.00	O	CK	G
			500.00	LP	CK	G
	10/01/86	150.00	150.00	O	DB	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Richard A. Walker	9/18/86	2,500.00	1,500.00	O	CK	G
Mr. Rett Waller	9/16/86	1,250.00	250.00	LP	CK	G
Mrs. Rett Waller	9/16/86	1,250.00	250.00	LP	CK	G
Mr. George Watkins	4/09/85	1,000.00	1,000.00	O	DB	P
Mr. Larry Weidel	10/14/86	250.00	250.00	O	DB	G
Mrs. Larry Weidel	10/14/86	250.00	250.00	O	DB	G
Mr. Thomas B. Wells	5/15/85	1,000.00	250.00	O	CK	P
Mr. Charles B. West	8/19/86	1,000.00	1,000.00	O	DB	G
Mr. Charles B. West	5/18/85	1,000.00	1,000.00	O	CK	P
	9/01/86	2,000.00	1,000.00	O	CK	G
Mr. Frank B. Wetherbee	1/28/86	200.00	200.00	O	DB	P
	4/03/86	100.00	100.00	O	DB	P
Mr. Phillip White	10/14/86	1,250.00	400.00	O	DB	G
Mr. Richard K. Whitehead, Jr.	5/29/85	2,500.00	1,500.00	O	CK	P
Mr. James C. Whitesell	9/20/85	25.00	25.00	O	DB	P
	12/06/85	25.00	25.00	O	DB	P
Mr. Bill Whittle	10/14/86	250.00	250.00	O	DB	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mrs. Bill Whittle	10/14/86	250.00	250.00	O	DB	G
Mr. Arthur L. Williams	6/11/86	1,250.00	250.00	O	CK	P
	9/25/86	2,500.00	1,500.00	O	CK	G
Mr. B. Wilmont Williams	5/24/85	1,000.00	500.00	O	CK	P
	5/30/85	500.00	500.00	O	DB	P
Mr. Bennie G. Williams	10/01/83	1,000.00	1,000.00	O	DB	P
Mr. Claude Williams, Jr.	10/28/83	1,000.00	100.00	O	DB	P
	5/20/85	1,000.00	1,000.00	O	CK	P
Dr. David A. Williams, M.D.	5/17/85	1,000.00	550.00	O	CK	P
Mr. Don H. Williams	10/01/86	20.00	20.00	O	DB	G
Rev. Jesper Williams	6/25/86	1,250.00	250.00	O	CK	P
Mrs. Thomas L. Williams, Jr.	10/01/83	1,000.00	1,000.00	O	DB	P
Mr. Tom Williams, III	10/01/83	1,000.00	1,000.00	O	DB	P
Mrs. Harry B. Winkler	10/24/86	500.00	500.00	O	DB	G
Mr. Emory Winship	5/10/83	1,000.00	500.00	O	DB	P
	2/13/85	500.00	500.00	O	DB	P
	11/19/85	1,000.00	1,000.00	O	CK	P
Mr. H.D. Winship	4/29/85	1,000.00	1,000.00	O	CK	P

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mrs. Lynne M. Winship	10/31/86	2,000.00	1,000.00	O	CK	G
Mr. Wadleigh C. Winship	10/30/86	2,000.00	1,000.00	O	CK	G
Mrs. Elmer Wirman	10/14/86	250.00	250.00	O	DB	G
Mr. Elmer Wirman	10/14/86	250.00	250.00	O	DB	G
Mr. A.L. Womack	10/07/86	210.00	210.00	O	DB	G
Mr. Paul H. Womack	5/30/85	500.00	500.00	O	DB	P
Ms. Connie R. Wood	12/31/86	200.00	200.00	O	DB	G
Ms. Emily Woodruff	1/29/86	50.00	50.00	O	DB	P
	10/24/86	1,000.00	1,000.00	O	CK	P
Mr. J. Barnett Woodruff	4/02/85	1,000.00	250.00	O	CK	P
	5/29/85	2,000.00	2,000.00	O	CK	P
	10/24/86	2,000.00	2,000.00	O	CK	G
Mr. Frank L. Woodward	7/15/86	25.00	25.00	O	DB	P
Mr. Ray Wooldridge	6/11/86	1,250.00	750.00	O	CK	P
	9/22/86	1,500.00	500.00	LP	CK	G
Ms. Bright K. Wright	10/30/86	2,000.00	1,000.00	O	CK	G
Mr. Mike L. Wroten	9/12/86	1,250.00	250.00	LP	CK	G

Apparent Excessive Contributions From Individuals

Contributor Name	Contribution Date	Contribution Amount	Excessive Amount	Excessive Type[1]	Excessive Source[2]	Elec. Des.[3]
Mr. Harlen Zeitler	10/01/86	2,000.00	1,000.00	O	CK	G
	10/01/86	500.00	500.00	LP	CK	G
Mr. Sigmund Zilber	12/19/86	100.00	100.00	O	DB	G
Total			$344,840.00			

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1/ LP - Late Primary. Those contributions that the contributor designated for the primary election after the date of the primary. Since the Committee had no net debt on the date of the primary, these are considered excessive contributions.

O - All other excessive contributions.

2/ Source
DB - Data Base. This contribution is recorded on the Committee's automated contributor data base.

CK - Check Copy. A copy of the contribution check for this contribution was located in the Committee records.

3/ Election Designation.
P - Primary Election.
G - General Election.

The election designation was determined by following the contributor's designation on the contribution check or accompanying documentation. In the absence of such a designation, those contributions dated on or before the date of the primary election were considered to be primary election contributions. Those contributions dated after the primary election were considered general election contributions. One exception to this procedure is that contributions shown as Late Primary (see Footnote 1/above) are considered general election contributions.

4/ Committee reported a $100 refund on 11/5/86. However, the refund check was located in the Committee's files uncashed.

5/ All three checks were drawn on Cook and Company account, however, notations on checks attributed contributions to three individuals.

6/ This contribution was refunded. However, the refund was not made timely.

7/ The Committee refunded $500 to this contributor, however, the refund was not made timely.

8/ The Committee refunded $400 to this contributor, however, the refund was not made timely.

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Apparent Excessive Contribution
From Political and Other Committees

	Committee Name	Contribution Dates	Contribution Amounts	Election Designation	Source of Designation[1/]	Total Contributions	Excessive Amount
1.	A.L. Williams & Associates PAC, Inc.	10/31/86	$5,000.00	Primary	Check	$ 10,000.00[2/]	$ 5,000.00
	American Financial Services Association Political Action Committee	9/13/83	$ 500.00	General	Committee		
		2/13/85	1,000.00	General	Committee		
		3/11/86	1,000.00	General	Committee		
		6/25/86	1,000.00	General	Committee		
		8/12/86	1,000.00	General	Committee		
		9/29/86	1,000.00	General	Committee		
		Total	$5,500.00			$ 5,500.00	$ 500.00
3.	Associated General Contractors PAC	3/24/82	$ 500.00	Primary	Date		
		9/29/83	1,000.00	Primary	Committee		
		2/25/85	1,000.00	Primary	Check		
		4/05/85	3,000.00	Primary	Check		
		Total	$5,500.00			$ 10,500.00	$ 500.00[3/]
4.	Bankers Trust New York Corporation Fund for Good Government	10/28/83	$1,000.00	General	Committee		
		7/24/84	1,000.00	General	Committee		
		1/29/85	1,000.00	General	Committee		
		4/02/86	2,000.00	General	Committee		
		9/23/86	2,000.00	General	Committee		
		Total	$7,000.00			$ 7,000.00	$ 2,000.00

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Committee Name	Contribution Dates	Contribution Amounts	Election Designation	Source of[1]/ Designation	Total Contributions	Excessive Amount
5. Citizens & Southern Georgia Corporation Better Government Fund	9/23/83	$ 250.00	Primary	Committee		
	9/23/83	500.00	Primary	Committee		
	10/26/83	500.00	Primary	Committee		
	2/06/85	1,000.00	Primary	Committee		
	2/21/85	500.00	Primary	Committee		
	4/17/85	2,750.00	Primary	Committee		
	6/20/85	500.00[3]/	Primary	Date		
	7/25/85	1,000.00[3]/	Primary	Date		
	11/05/85	1,000.00[3]/	Primary	Date		
	Total	$8,000.00			$ 9,958.34	$ 3,000.00
6. Committee to Re-Elect Senator Paula Hawkins		3,363.71	General	7/	$ 3,363.71	$ 2,363.71
	Total	$6,723.22[4]/				
7. Flowers Political Action Committee	2/13/85	$2,500.00	General	Committee		
	6/03/85	5,000.00	General	Check		
	Total	$7,500.00			$ 10,000.00	$ 2,500.00
8. Gold Kist Political Action for Farmers, Inc.	8/13/85	$1,000.00	General	Committee		
	10/03/86	5,000.00	General	Committee		
	Total	$6,000.00			$ 10,550.00	$ 1,000.00

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	Committee Name	Contribution Dates	Contribution Amounts	Election Designation	Source of Designation[1]	Total Contributions	Excessive Amount
9.	Lockheed Political Action Committee	10/06/83	$ 500.00	General	Committee		
		11/18/83	1,000.00	General	Committee		
		6/07/85	500.00	General	Check		
		2/25/86	4,500.00	General	Check		
		Total	$6,500.00			$ 10,000.00	$ 1,500.00
10.	The Morgan Companies Political Action Committee	10/05/83	$ 500.00	General	Committee		
		1/30/85	1,000.00	General	Committee		
		3/14/86	1,500.00	General	Check		
		9/17/86	2,500.00	General	Committee		
		Total	$5,500.00			$ 10,000.00	$ 500.00
11.	The National Association of Life Underwriters PAC	10/23/86	$3,850.00	Primary	Check	$ 10,000.00	$ 3,850.00[2]
12.	Northrop Employees PAC	3/22/82	$ 500.00	Primary	Date		
		9/23/83	1,000.00	Primary	Committee		
		3/01/85	3,000.00	Primary	Check		
		6/28/85	500.00	Primary	Committee		
		3/10/86	2,000.00	Primary	Check		
		Total	$7,000.00			$ 10,000.00	$ 2,000.00

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Committee Name	Contribution Dates	Contribution Amounts	Election Designation	Source of Designation[1/]	Total Contributions	Excessive Amount
13. Political Action Committee of the Dunn & Bradstreet Corporation	9/20/83	$ 500.00	General	Committee		
	2/20/85	1,000.00	General	Committee		
	5/10/85	333.34	General	Committee		
	3/24/86	2,000.00	General	Committee		
	4/09/86	286.00	General	Committee		
	8/12/86	1,000.00	General	Committee		
	9/22/86	1,000.00	General	Committee		
	Total	$6,119.34			$ 6,619.34	$ 1,119.34
14. Prudential Political Action Committee	10/27/83	$ 500.00	Primary	Committee		
	3/20/85	5,000.00	Primary	Committee		
	5/01/86	1,000.00	Primary	Committee		
	Total	$6,500.00			$ 7,500.00	$ 1,500.00
15. Public Service Political Action Committee	3/03/82	$ 500.00	Primary	Date		
	2/06/85	1,000.00	Primary	Check		
	3/04/86	1,000.00	Primary	Check		
	6/18/86	3,000.00	Primary	Check		
	Total	$5,500.00			$ 6,500.00	$ 500.00
16. Textron Political Action Committee	9/29/83	$1,000.00	General	Committee		
	3/14/85	1,000.00	General	Committee		
	6/19/85	1,000.00	General	Committee		
	7/24/85	1,000.00	General	Committee		
	4/29/86	2,000.00	General	Committee		
	6/03/86	2,500.00	General	Committee		
	Total	$8,500.00[6/]			$ 9,500.00	$ 3,500.00

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Committee Name	Contribution Dates	Contribution Amounts	Election Designation	Source of 1/ Designation	Total Contributions	Excessive Amount
17. United Technologies Corporation Political Action Committee	3/03/82	$ 500.00	Primary	Date		
	11/15/83	1,000.00	Primary	Committee		
	2/20/85	1,000.00	Primary	Committee		
	3/27/86	3,000.00	Primary	Check		
	Total	$5,500.00			$ 8,500.00	$ 500.00
	Grand Totals				$145,491.39	$31,833.05

1/ Legend for Source of Designation:

Check - Election designation appeared on the contribution check or associated correspondence.

Committee - The contributing committee designated the contribution on its disclosure report.

Date - Neither a check or contributing committee designation was available. If the contribution was dat on or before the 8/12/86 primary it was considered to have been made for the primary election. I dated after 8/12/86 it was considered to have been made for the general election.

2/ This contribution was designated by the contributing committee for the primary election after the date of the primary. It is considered excessive since the contributing committee gave $5000 for the general election and Friends of Mattingly had no primary debt.

3/ These contributions were designated by the contributing committee for a run off election. There was no run off election and the contributions were made before the primary date. Therefore these contributions are considered be for the primary election.

4/ These contributions were made after the date of the primary election by an unregistered committee.

5/ The remaining $1000.00 contributed by this committee was designated on its reports as "other Non-Election Year." Since it was dated before the primary, it is considered to have been made for the primary election.

6/ Committee reported a $500 refund on 11/5/86. However, the refund check was located in Committee's files uncashe

7/ This contribution is the result of an improper allocation of joint fundraising proceeds by Floridians for Presid Reagan's Majority.

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Apparent Corporate Contributions

Section 441b(a) of Title 2 of the United States Code states, in relevant part, that it is unlawful for any corporation to make a contribution in connection with any election at which a Senator is to be voted for, or in connection with any primary election to select candidates for the foregoing office. In addition, this cite makes it unlawful for any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section.

The Committee's 1985-86 contribution records were tested to determine if contributions had been received from corporate sources. The test results indicated that the Committee had accepted a material number of apparent corporate contributions. Therefore, the Audit staff performed a 100% review of available contributor records to identify possible prohibited contributions.

This review identified 187 contributions from 152 apparent corporate entities, totalling $30,610.59. It should be noted that of the 187 apparent prohibited contributions, 3 were refunded to the contributor and a portion of another was refunded, but these refunds were not made timely (between 160 and 527 days).

Attachment 3 contains a listing of the apparent corporate contributions discussed above.

In the Interim Audit Report the Audit staff recommended that the Committee either demonstrate that the contributions are not prohibited or refund the contributions and provide evidence of the refunds.

The Committee's response to the Interim Audit Report makes several points concerning the apparent prohibited contributions.

First, Mr. Stewart recounts a meeting with Audit staff members in which he states that he was informed that the apparant corporate contributions were confirmed with the Secretary of State of Georgia and that all of the apparent prohibited contributions were confirmed with the Secretary of State. This statement is correct. Those entities with Georgia addresses were confirmed with the Secretary of State of Georgia and those with addresses in states other than Georgia were checked with the Secretary of State in those states. Assuming that the quotations in Mr. Stewart's letter are accurate and in proper context, they do not necessarily support the conclusion that he reaches. Most apparent corporate entities were confirmed with the Secretary of State of Georgia and all of the alleged corporate contributors were confirmed with the Secretary of State.

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Second, Mr. Stewart states that letters have been sent to some of the alleged corporate contributors and 80% of those who replied indicate that they were not corporations. No indication is given as to how many letters were sent and how many replied, and no copies of the replies were provided.

Third, Mr. Stewart states that at least one response indicated that a corporate contribution had been made but that the contribution check was returned uncashed with a request that it be replaced with a personal check. Mr. Stewart goes on to explain that this was a Committee procedure and that if the checks had been traced to deposit tickets this would have been obvious.

The assertion that the alleged corporate contribution checks were not traced to deposits is correct. The Committee's contribution check copies beginning in June 1985, were numbered beginning with one and continuing beyond 20,000. The checks were filed in numerical order. The numbering appeared to approximate receipt order. With the exception of some 1984 and early 1985 checks, deposit tickets were not associated with the contribution check copies. During the audit fieldwork, Mr. Stewart was asked if the numbers had any significance and if so how they might be used. He explained that he was unaware of the numbering and had no idea if they could be used to locate specific transactions and if so how, but he would attempt to contact someone who might know. No further information was provided. Hence, it was not feasible to locate the deposit slips for the contributions, rather, it was assumed that if the records contained a copy of the contribution check, the contribution was deposited.

Finally, the Committee response indicates that several of the contributions were previously questioned by the FEC during the campaign and that the Committee satisfactorily responded to those questions. A review of the requests for additional information sent by the Reports Analysis Division indicates that 6 of the apparent corporate contributions were questioned. Of these, three were refunded by the Committee. These were identified on attachment 3 to the Interim Audit Report as untimely refunds. For two in-kind corporate contributions, no response to the request for additional information was found. For the remaining contribution, the Committee responded that the former owner of the business operated it as a corporation but that the current owner does not. No support for the statement was provided.

Given the above, the Audit staff has not amended the interim audit report figures.

Recommendation #2

The Audit staff recommends that this matter be referred to the Office of the General Counsel.

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Apparent Corporate Contributions

Contributor	Date	Amount
Adams, Dr. John C., Jr. P.C. Statesboro, GA	10/23/86	$ 150.00
A. G. Spanos Development, Inc. Atlanta, GA	11/12/85	500.00[3]/
Argenbright, Inc. College Park, GA	5/24/85	100.00[3]/
Armada Vehicle Rental, Inc. P.O. Box 48405 Doraville, GA 30362	9/23/86 9/30/86 9/30/86	83.34 78.90 78.35
Athens Insurers Athens, GA	8/22/86	100.00
Atkins and Associates Realty Co. Augusta, GA	5/21/85	25.00
Autumn Products Lawrenceville, GA	2/12/86	100.00
Avail-Ability Inc. Lithia Springs, GA	12/05/85	250.00
Aztec International, Ltd. Norcross, GA	10/30/86	25.00[3]/
Baker Farms Sale City, GA	8/17/85	25.00
B&B Truss Company, Inc. Suwanee, GA	11/14/85	100.00
Bibb Distributing Co. Macon, GA	6/14/85	250.00
Bill Taylor & Assoc. Jacksonville, Florida	2/19/85	500.00
Blue Ridge Aviation Flite Ctr. Gainesville, GA	5/22/85	25.00
B&M Wood Products Manor, GA	5/20/85	100.00

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Apparent Corporate Contributions

Contributor	Date	Amount
Ray Boyd Properties Atlanta, GA	5/31/85	$ 100.00
Bridges Farm Damascus, GA	8/12/85	50.00
Rose Briglevich MD PC Smyrna, GA	5/27/85 5/29/86	1,250.00[4]/ 50.00
Brock Chevrolet-Olds Inc. LaFayette, GA	12/16/85	25.00
Brown Brothers Harriman & Co. New York, NY	6/05/86	1,000.00
Brownlee & Lively Atlanta, GA	5/19/86	25.00[3]/
Buddy Buie Enterprises Atlanta, GA	3/04/86	25.00
Cable T.V. of Georgia and Associates Dahlonega, GA	5/23/86	25.00
Calhoun Oil Company Americus, GA	10/07/86	50.00[3]/
D. M. Carter Manufacturing Co. Blakely, GA	8/01/85	100.00
Cathedral of Faith Church of God in Christ Atlanta, GA	10/01/86	150.00
Century 21 Cook Realty, Inc. Dalton, GA	5/24/85	125.00
Century 21 of the Southeast, Inc. Atlanta, GA	5/22/85	1,000.00
China Garden Restaurant Columbus, GA	10/28/86	100.00
City Drug Store Brunswick, GA	5/13/85	75.00
Classic City Mechanical, Inc. Winterville, GA	12/05/85	25.00

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Apparent Corporate Contributions

Contributor	Date	Amount
Clay Farm Products Ft. Gaines, GA	7/25/86	$ 50.00[3]/
The Clothes Tree Forsyth, GA	6/13/86	100.00[3]/
Collins Brothers Vienna, GA	6/27/86 7/26/85	25.00 100.00
Colonial Holding Company St. Simons Island, GA	1/24/86	40.00
Colvin Appraisal Services, Inc. Lilburn, GA	12/06/85	50.00
Consolidated Tape & Label, Inc. Smyrna, GA	5/22/85	1,000.00
Gary Cooper Construction Acct/Flintside Subdivision Albany, GA	4/03/86	300.00
Country Cobbler Bainbridge, GA	5/23/86	100.00[3]/
Curry Farm Supply Shellman, GA	8/13/85 4/03/86	100.00 50.00
Daniel Moving & Storage, Inc. College Park, GA	9/29/86	50.00
Diversified Enterprises Albany, GA	8/14/85	100.00[3]/
Dixie Industrial Sales Thomasville, GA	2/10/86	100.00[3]/
Dixie Trucking Company Brunswick, GA	5/17/85	250.00[1]/
Roger Dunn & Sons Omega, GA	7/25/86	100.00[3]/
Dunwoody Office Supply, Inc. Dunwoody, GA	10/21/86	150.00[3]/

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Apparent Corporate Contributions

Contributor	Date	Amount
Eaton Construction Co. Warner Robins, GA	5/22/86	$ 100.00
Ellis Building Systems Tallapoosa, GA	2/10/86 7/01/86	100.00[3]/ 50.00
Emerald Petroleum Co, Inc. Savannah, Ga	9/16/85	25.00
The Exchange Bank Douglas, GA	8/18/86	50.00[3]/
FaHaCo Inc. Sylvania, GA	10/11/86	50.00[3]/
Family & Marriage Resources Austin, Texas	9/10/86	300.00
Farmers Tobacco Warehouse Vidalia, GA	1/15/85	250.00[3]/
Fesperman Insurance Co. Waycross, GA	4/25/85	250.00
Folsom Construction Company Cordele, GA	5/28/85	1,000.00
Forest Hills Memorial Gardens Forest Park, GA	6/19/86 10/25/86	25.00 25.00
Garnetts Summerville, GA	7/08/86 6/10/86 6/14/85 11/18/85	25.00[5]/ 25.00 25.00 25.00
Georgia Tire Co. of Vidalia, Inc. Vidalia, GA	9/25/86	75.00
Joe Goodson & Company Dalton, GA	2/28/86	50.00[3]/
A. J. Green, Insurance Agency Fairburn, GA	2/24/86	25.00
Hamby Enterprises Athens, GA	11/03/86 11/03/86	5.00 5.00

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Apparent Corporate Contributions

Contributor	Date	Amount
Harris Machine Co. Vienna, GA	7/10/86	$ 50.00[6]/
Henderson Funeral Home Moultrie, GA	1/21/86	100.00[3]/
Hendley Transfer Co. Millen, GA	1/27/86 10/29/86 9/18/85	50.00[3]/ 25.00 25.00
Herndon Drug Store Pavo, GA	2/05/86	50.00[7]/
Holcombe Armature Co. Atlanta, GA	9/17/85	25.00
HomeWay Rentals of Montgomery Montgomery, Alabama	6/03/85	1,000.00
Jim Hood, Inc. Lawrenceville, GA	11/18/85	20.00
Horton Popham & Company Douglasville, GA	12/06/85	50.00[3]/
Independent Freight Forwarders and Customs Brokers Assoc. of Savannah, Inc. Savannah, GA	3/13/84	500.00[3]/
Intervest Realter's Ltd. Atlanta, GA	2/19/86	50.00
Lex Jolley & Co. Inc. Atlanta, GA	11/12/85	500.00
Jones Peanut Company Chula, GA	8/21/85	100.00
The Robert S. Jordan Co. Atlanta, GA	5/30/85	25.00
J&W Farms Glennville, GA	2/13/86	150.00[3]/

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Apparent Corporate Contributions

Contributor	Date	Amount
Lakeside Farm Hayesville, NC	2/06/86 5/19/86 7/09/86 9/06/86	$1,000.00 50.00 25.00 100.00
J. Robert Logan, MD PC Savannah, GA	10/20/86	100.00
Mammy's Kitchen Atlanta, GA	7/10/86	25.00[3]/
Maricom Electronics Inc. Savannah, GA	10/24/86	150.00
Mauldin Enterprises Alpharetta, GA	3/04/86 5/12/86 7/14/86 8/19/86	25.00 25.00 25.00 25.00
McCole & Associates, Inc. Montezuma, GA	10/24/86	50.00
Meadows & Thomas Lyons, GA	9/04/86	50.00
Men's Den Cartersville, GA	9/20/85	25.00
W. B. Miller & Sons Tobacco Co. Attapulgus, GA	5/21/85 9/24/86	50.00[3]/ 50.00
Milton Martin, Inc. Gainesville, GA	10/07/86	50.00
M&M Farms Baconton, GA	10/07/86	100.00[3]/
Morris Brown College Atlanta, GA	3/08/85	250.00[1]/
Morris Newspaper Corp. Savannah, GA	3/06/84	250.00
Alfred Hammack D/B/A Morrow Professional Bldg. Jonesboro, GA	9/26/86	1,000.00[2]/
Moultrie Surgical Assoc., PC Moultrie, GA	9/09/86	200.00

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Apparent Corporate Contributions

Contributor	Date	Amount
Murrow Brothers Farmington, GA	8/20/86	$ 100.00
Noah's Ark Lithia Springs, GA	10/08/85	50.00
Northwestern Mutual Life - Harry D. Jones Brunswick, GA	1/26/86	20.00
OB-GYN Associates, PA Marietta, GA	5/17/85	250.00
Oral & Maxillofacial Surgery Associates Decatur, GA	12/02/85	500.00
Pacelli High School Columbus, GA	10/23/86	200.00[2]
Palmer Furniture Company Vidalia, GA	9/03/86	100.00[2]
Pate Aviation Consultants Atlanta, GA	5/24/85	50.00[1]
Patrician Properties Savannah, GA	10/24/86	150.00
Peerless Manufacturing Co. Shellman, GA	8/02/85	50.00
Peoples's Transportation Services, Limited Atlanta, GA	11/27/85	200.00
Peoples Warehouse Blakely, GA	9/21/85 9/05/86	50.00 50.00
Pepsi Cola Distribution Co. Columbus, GA	5/30/85	25.00[8]
Pickett Pickett & Pickett Attorneys Jasper, GA	10/22/86	1,000.00
Bill Pilgrim Enterprises Inc. Douglasville, GA	12/06/85	250.00
Pineland Enterprises Sylvester, GA	10/07/85	15.00[2]

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Apparent Corporate Contributions

Contributor	Date	Amount
The Pinkerton & Laws Co. Atlanta, GA	11/15/85	$ 250.00
Pippin Pecans Albany, GA	1/23/86	100.00
Plainsman Carpet Company Swainsboro, GA	5/24/85	25.00
Planters Warehouse Pinehurst, GA	8/16/85 7/14/86	50.00 50.00
Pleasant Acres Milner, GA	4/27/85 9/04/86	25.00[2/] 25.00
Possum Eddy Hardware Sylvania, GA	10/11/86	25.00
R & R Diversified Gainesville, GA	1/14/86	100.00[2/]
Realty Associates Savannah, GA	9/12/85	25.00
Reeves, Avary Associates Lilburn, GA	9/16/86	285.00
William L. Reno and Associates Statesboro, GA	11/15/85	250.00
Rep. Tom Lawrence (Legislative Expense Account) Atlanta, GA	4/03/86	100.00
Richmond Carpet Mills, Inc. Ringgold, GA	10/14/85	50.00
Riverside Development Macon, GA	6/10/85	250.00
Robert T. Shircliff and Associates Jacksonville, Florida	1/07/86 2/12/85	250.00 500.00
Roche Manufacturing Company Dublin, GA	8/09/85	100.00

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Apparent Corporate Contributions

Contributor	Date	Amount
Rolling Meadows Augusta, GA	10/20/86	$ 50.00[2/]
Sanders Brothers Doerun, GA	7/19/86	100.00
The Scruggs Company Valdosta, GA	2/03/86	100.00
Sea Island Cotton Gin Company Vidalia, GA	1/14/85	50.00
Seckinger Realty Company Brunswick, GA	1/24/86	20.00[2/]
Simplex Nails, Inc. Americus, GA	10/22/86	100.00
Southeastern Management Atlanta, GA	9/25/86	50.00[2/]
Southern Energy Brunswick, GA	5/17/85	250.00
Sparrow Farms, Inc. Unadilla, GA	12/09/85	100.00
Standard Southest, Inc. Norcross, GA	9/29/86	150.00
Standard Transfer Co, Inc. Mableton, GA	12/04/85	25.00
W. G. Steve Company Dalton, GA	9/29/86	100.00
Stricklands Pharmacy Glennville, Ga	10/27/86	150.00
Stubbs Shipping Company Sea Island, GA	6/26/86	200.00[2/]
Sumner Rainbow Sylvester, GA	8/09/85	25.00
George A. Teck-Machine Tool Co. Tucker, GA	9/30/86	100.00

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Apparent Corporate Contributions

Contributor	Date	Amount
Thomasville Farm Supply Co. Thomasville, GA	4/26/85	$ 50.00[3]/
Tyler & Company Atlanta, GA	5/23/85	25.00
Underwood Enterprises Gainesville, GA	6/28/85 5/19/86	15.00 25.00
Vaughn Lumber Company Forsyth, GA	5/24/85	250.00
Ed Voyles Chrysler-Plymouth Marietta, GA	5/21/85 5/08/86	250.00 25.00
Bill Walker and Assoc. St. Simons Island	5/31/85 2/19/86	200.00 100.00
The Warwick Agency Brunswick, GA	1/26/86	20.00
Weatherly & Associates, Inc. Tybee Island, GA	11/16/85	250.00[3]/
General Roofing Co. D/B/A White Roofing Company Atlanta, GA	5/20/85 12/05/85	200.00 75.00
Williams Farms Moultrie, GA	10/31/86	100.00
Willis and Veenstra Investment Co. Jacksonville, Florida	2/15/85	500.00
Wilson Properties Warner Robbins, GA	2/19/86	25.00[3]/
Wright Farms Albany, GA	5/31/83 6/06/83 7/18/84 5/29/85 4/07/86 4/07/86 8/04/86 10/03/86	500.00 500.00 400.00 1,000.00 300.00 50.00 200.00 200.00

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Apparent Corporate Contributions

Contributor	Date	Amount
W. A. Youngblood Jr. Inc. D/B/A Otasco Assoc. Store Swainsboro, GA	5/23/85	25.00
Zumpano Enterprises, Inc. Norcross, GA	12/13/85	75.00 3/
		$30,610.59

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1/ This contribution has been refunded. However, the refund was not made timely.

2/ According to the Georgia Secretary of State's Corporation Division, this entity was incorporated but not in good standing as of the date of the contribution. They stated that "not in good standing" does not mean an entity relinquishes its corporate status according to Georgia State Law.

3/ According to the Georgia Secretary of State's Corporation Division, this entity was incorporated but not in good standing. However, no date was provided as to when the good standing status changed.

4/ Three hundred dollars was refunded to this contributor, however, the refund was not made timely.

5/ This corporation was dissolved on 12/23/86.

6/ This corporation was dissolved on 12/22/86.

7/ This corporation was dissolved (no date provided).

8/ This corporation was dissolved on 12/30/85.

Earmarked Contributions

Section 441a(a)(8) of Title 2 of the United States Code states, in part, that all contributions made by a person on behalf of a particular candidate, including contributions which are in anyway earmarked through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate. The section also requires the intermediary or conduit to report the original source and the intended recipient of such contribution to the Commission and to the intended recipient.

Section 110.6(c)(3) of Title 11 of the Code of Federal Regulations states that the intended recipient shall disclose on his next report each conduit through which the contribution passed.

1. National Republican Senatorial Committee (NRSC) Direct-To Program

The Committee participated in a program sponsored by the NRSC known as the "Direct-to Program" whereby the NRSC solicited contributions from its contributors and then transmitted them to participating Republican Senate candidates as earmarked contributions.

A written agreement for the program was signed by an NRSC representative on 12/13/85 and by a Committee official on 1/20/86 (See Attachment 4). The agreement states that contributions received through this program must be deposited in the Committee's general election account and are to be used exclusively for the general election campaign. The agreement further states that each earmarked contribution must be applied against the contributor's general election limit.

The agreement also states that the Committee must assume the direct fundraising costs associated with the program and therefore the Committee would be billed $3 - $4 per contributor on a monthly basis.

The Direct-to contributions were transmitted to the Committee by one of two methods:

(1) By original contributor checks payable to the Committee and forwarded uncashed.

(2) By NRSC transmittal check or wire transfer payable to the Committee for a number of contributions which were first deposited by the NRSC.

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For both methods, the NRSC provided to the Committee memo Schedules A itemizing all contributions, regardless of amount. It was noted on the Schedule A's for each contribution whether the item was transmitted as an original contributor check or as part of an NRSC check. The memo Schedules A also noted that the NRSC had acted as a conduit for the contributions. Further, many of the transmittal letters contained a paragraph explaining the Committee's reporting responsibilites.

The auditors reviewed available contribution records to determine the total amount of contributions earmarked through the NRSC to the Committee. The Audit staff determined that the Committee received as earmarked contributions (pursuant to 11 C.F.R. § 110.6(c)(3)) the following amounts.

Reporting Period	Amount Received	Amount Disclosed As Earmarked	Difference
Year-End '85 (Dec. '85)	$ 3,700.00	$ -0-	$ 3,700.00
April & July Quarterly (1/1/86-6/30/86)	59,403.34	-0-	59,403.34
Pre-Primary '86 (7/1/86-7/23/86)	7,050.00	-0-	7,050.00
October Quarterly (7/24/86-9/30/86)	120,173.25	-0-	120,173.25
Pre-General '86 (10/1/86-10/15/86)	117,856.05	$70,423.32	47,432.73
Post-General '86 (10/16/86-11/23/86)	43,808.97	27,592.72	16,216.25
Totals	$351,991.61	$98,016.04	$253,975.57

Therefore, the Committee did not disclose as earmarked $253,975.57 in contributions transmitted through the NRSC. However, the Audit staff located in the Committee's records copies of memo Schedules A provided by the NRSC supporting $151,348.88 of this amount. Also located was a Committee generated listing for the period January 1 to June 30, 1986, totalling $56,488.40. No detailed record was found for the remaining $46,144.29.

Committee officials provided no explanation for their failure to disclose the $253,975.57 as contributions earmarked through NRSC.

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At the exit conference, the Audit staff discussed with a Committee official the amount of contributions not disclosed as earmarked. The auditors provided to the Committee photocopies of the workpapers generated in determining these figures.

In the interim audit report, the Audit staff recommended that the Committee file amended reports to disclose that the $253,975.57 in contributions disclosed above were earmarked through the NRSC. The Committee has not filed the amended reports.

Recommendation #3

The Audit staff recommends that this matter be referred to the Office of General Counsel.

2. Joint Fundraising Committee

The Committee participated in a joint fundraising event sponsored by the Senator John Warner Golf Tournament Committee (GTC) in 1985, and again in 1986.1/ The GTC registered with the U.S. Senate on April 23, 1985.

The Audit staff noted that in 1985, the GTC reported forwarding to the Committee 28 contributions, or portions thereof, totalling $15,283.44, which were earmarked to Friends of Mattingly. The Committee did not disclose these contributions as being earmarked through the GTC as required by 11 C.F.R. § 110.6(c)(3). The auditors verified that 24 of the 28 earmarked contributions were itemized on the Committee's FEC reports.

In 1986, the GTC reported forwarding to the Committee 29 contributions, or portions thereof, totalling $19,608.34, which were earmarked to Friends of Mattingly. The Committee did not disclose these contributions as being earmarked through the GTC as required by 11 C.F.R. § 110.6(c)(3). The auditors verified that 28 of the 29 earmarked contributions were itemized on the Committee's FEC reports.

The Committee provided no explanation for their failure to disclose the GTC as the conduit through which these contributions passed. The auditors noted that the Committee was notified of their FEC reporting obligations by letter dated September 30, 1986 from the treasurer of the GTC.

At the exit conference, the Audit staff provided to the Committee photocopies of the GTC's memo entry Schedule A's which contained the earmarked contributions to the Friends of Mattingly.

1/ The 1985 Committee was registered with the FEC as the "John Warner Invitational Golf Tournament Committee."

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In the interim audit report, the Audit staff recommended that the Committee file amended reports to disclose that the 28 contributions in 1985 and the 29 in 1986 were earmarked through the GTC. The Committee has not filed the amended reports.

Recommendation #4

The Audit staff recommends that the matter be referred to the Office of General Counsel.

3. Political and Other Committees

The Committee's 1985-86 contribution records were reviewed to determine if any contributions were earmarked to Friends of Mattingly through political committees. The Audit staff examined available photocopies of political committee contributor checks and accompanying letters or other documentation and ascertained whether the Committee disclosed each conduit through which contributions passed pursuant to 11 C.F.R. § 110.6(c)(3).

Based on our review, the Audit staff determined that the Committee received 80 contribution checks, totalling $22,285.97, which were earmarked through 28 political committees (Attachment 5). The Committee did not disclose the identification of the committees through which these contributions passed. It should be noted that the Committee did disclose that one of these contributions ($25) was a conduit contribution, but the committee through which it passed was not identified.

In the interim audit report, the Audit staff recommended that the Committee file amended reports to disclose as conduits, the 28 political committees through which the 80 contribution checks passed. The Committee has not filed the amended report.

Recommendation #5

The Audit staff recommends that this matter be referred to the Office of General Counsel.

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CHAIRMAN

TOM GRIBCOM
EXECUTIVE DIRECTOR

National Republican Senatorial Committee

Direct-To Program Agreement

The Direct-to Program is an effort organized by Sen. John Heinz and the National Republican Senatorial Committee for the general election benefit of individual candidates. Individual contributors from the NRSC's masterfile will be able to earmark contributions for a specific Senate general election campaign. Most Direct-to participants will be contributing individual amounts of $100 or more.

By law, the NRSC is allowed to contribute approximately $11 million to candidates through coordinated dollars. To maintain a Republican majority in 1986, Republican candidates will need more help. The NRSC's Direct-to Program allows individual contributors to specifically name a campaign (or campaigns) as the "earmarked " recipient(s) of a contribution. In this manner, the NRSC hopes that additional money can be made available to Senate general election candidates.

Money received through the Direct-to Program can only be deposited in the campaign's general election account and is to be used exclusively for the general election campaign. Each earmarked contribution must be applied against the contributor's limit to the campaign's general election. All Direct-to money is sent to the campaign through the NRSC. Although the NRSC will send a thank you letter to each of the contributors, a separate letter from the campaign to the contributor would be appreciated and will help establish a pattern of communication that will aid in resolicitation.

One person on the NRSC staff will serve as an information source for campaigns and in-house staff concerning Direct-to matters. Dina Beaumont will serve initially in this capacity, and can be reached at (202) 347-0202. Her responsibilities will include:

* Serve as liaison between the Direct-to Program and campaigns.
* Advise and assist campaigns with Direct-to concerns.
* Work with campaigns to verify adequate record-keeping and FEC compliance concerning the Direct-to money to campaigns.
* Announce the receipt of incoming Direct-to money by campaigns.
* Follow-up thank you notes from campaigns.

440 FIRST STREET, N.W. • SUITE 600 • WASHINGTON, D.C. 20001 • (202) 347-0202 • (202) 224-2351

PAID FOR AND AUTHORIZED BY THE NATIONAL REPUBLICAN SENATORIAL COMMITTEE

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To alleviate confusion, Dina will be the only NRSC staff member announcing Direct-to contributions to campaigns.

Federal Election Law requires that a campaign must assume the direct fundraising costs associated with an effort such as the Direct-to Program. Participating campaigns will be billed on a monthly basis on the 10th of each month for money directed in the previous calendar month. Campaigns will be charged on a 'per contributor' basis, with the actual charge determined by the direct fundraising costs associated with a particular mailing/event. (The per contributor charge will be in the $3-$4 range.) Payment will be due from the campaign's general election account thirty days from the date of invoice.

To assist NRSC and campaign compliance with the Federal Election Campaign Act, up to five percent (5%) of the NRSC's maximum coordinated expenditure on behalf of a state will be escrowed until October 20 of the election year. If all payments have been made for the Direct-to Program, all coordinated money will be available for varied uses (i.e., media, mailings, office support). If payments have not been made, the escrowed coordinated money will be used to pay the campaign's invoiced portion of the direct costs associated with the Direct-to Program.

On behalf of the Friends of Mattingly campaign, I hereby acknowledge receipt of the above information pertaining to the NRSC's Direct-to Program and the Friends of Mattingly campaign's participation in the program.

12/13/85 Robert Holsworth Manager

(NRSC representative) (date) (signature) (title)

1-20-86

(date)

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Friends of Mattingly

Contributions Earmarked Through
Political and Other Committees
for Which Conduits Were Not Disclosed

Conduit Committee	Contribution Check Date	Check Amount	Contributor Name	Share
1. American Express Committee for Responsible Government	2/6/86	$1,000.00	Jim Robinson	$1,000.00
2. AT&T PAC	4/9/86	130.00	Unknown	130.00
	8/29/86	290.00	Eugene Fuoco	140.00
			Fred W. Baumann	30.00
			Dan H. Reynolds	50.00
			Karen L. Dowdle	70.00
	10/17/86	420.00	Jack C. Roberts, Jr.	70.00
			Dean R. Frey	300.00
			Frank W. Dunn, Sr.	50.00
3. Bank America Federal Election Fund	6/23/86	1,000.00	Mr. A. A. Huber	1,000.00
4. Bell South Services Federal PAC	2/28/86	50.00	John F. Bryant	50.00
	2/28/86	5.00	Joy M. Dance	5.00
	3/21/86	20.00	James G. Larew	20.00
5. Campaign America	3/14/86	1,000.00	Tobacco Institute	1,000.00
	4/18/86	1,000.00	American Express Cmte. for Responsible Government	1,000.00
	4/18/86	550.00	National Cooperative Business Assoc.	550.00
	5/6/86	1,000.00	Prudential Ins. Co. of America PAC	1,000.00

Friends of Mattingly

Contributions Earmarked Through
Political and Other Committees
for Which Condudits Were Not Disclosed

Conduit Committee	Contribution Check Date	Check Amount	Contributor Name	Share
5. Campaign America (continued)	6/18/86	$1,000.00	Mobil Oil Corp, PAC	$1,000.00
6. Chatham County Republican Party	10/11/86	255.00	F. Earl Waller	255.00
7. Citizens for American Values PAC	11/4/86	1,000.00	William L. Searle	1,000.00
8. First Atlanta Corp. Fund For Better Gov't	6/4/85	100.00	James P. Steele	100.00
	6/6/86	100.00	Gail A. Lione	100.00
	10/3/86	250.00	William D. Hart	250.00
	10/28/86	45.97	Cynthia Russell	45.97
	10/30/86	100.00	Herb Jones	100.00
	10/30/86	100.00	J. Michael Whitmire	100.00
9. 41st District Republican Party of Dekalb County	6/12/86	50.00	Louise G. McCahan	8.33
			Kinzel B. Grubbs, Jr.	8.33
			Gloria G. Putnam	8.33
			Sandra Kerby	8.33
			Altos B. Hollis	8.33
			Debbie Walls	8.35
10. The Fund for America's Future	9/29/86	1,000.00	Allied-Signal PAC	1,000.00

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Friends of Mattingly

Contributions Earmarked Through
Political and Other Committees
for Which Conduits Were Not Disclosed

Conduit Committee	Contribution Check Date	Check Amount	Contributor Name	Share
11. Georgia Republican Party	5/9/85	$1,000.00	Unknown	$1,000.00
	5/28/85	1,000.00	J. Chandler Peterson, Jr. and Thaxton Peterson	1,000.00
12. Glynn County Republican Party	10/27/86	250.00	Jeanne Alaimo	250.00
13. Manufacturers Hanover Corp. Association for Responsible Gov't	4/14/86	300.00	Fred Betts	300.00
14. Mead Effective Citizenship Fund	6/4/85	75.00	Wayne R. Duttenhaver	75.00
	6/27/85	25.00	Robert Dover	25.00
	7/8/85	60.00	Ronald A. Chipman	60.00
	10/23/85	50.00	Thomas H. Mozley	50.00
	1/31/86	30.00	Wayne R. Duttenhaver	30.00
	3/4/86	50.00	P. G. Krieger	50.00
	3/11/86	90.00	Paul Hudson	90.00
	3/18/86	50.00	Thomas H. Mozeley	50.00
	10/21/86	1,000.00	A. D. Correll William A. Enouen Nelson S. Mead Robert L. Share David C. Stevens Randall E. Bailey	1,000.00
	10/24/86	517.50	Nelson S. Mead Paul B. Schuler J. H. Stausboll Harry E. Ruter Hank Cydrus Clayton E. Burke Joan T. Cummins Fred O. Ford	517.50

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Friends of Mattingly

Contributions Earmarked Through
Political and Other Committees
for Which Conduits Were Not Disclosed

Conduit Committee	Contribution Check Date	Check Amount	Contributor Name	Share
14. Mead Effective Citizenship Fund (continued)				
	10/24/86	485.00	C. E. Burke	165.00
			G. G. Clarke	170.00
			J. T. Cummins	35.00
			A. K. Renick	55.00
			J. H. Stausboll	60.00
15. Monsanto Citizenship Fund	8/9/85	$ 120.00	Hugh G. Wilson	$ 120.00
	8/14/85	120.00	Hugh G. Wilson	120.00
	2/10/86	60.00	John E. Ritorto	60.00
16. The National Congressional Club */	11/4/86	25.00	A. H. Drake	25.00
17. National Conservative PAC	9/30/86	1,000.00	Nathan J. Clark	1,000.00
	10/29/86	1,000.00	Kevin C. Clark	1,000.00
18. NonPartisan Political Support Committee	4/29/86	300.00	Unknown	300.00
	10/22/86	1,000.00	Unknown	1,000.00
19. Norfolk Southern Corp. Tax Eligible Good Gov't Fund	10/16/85	100.00	Raymond D. Hedberg	100.00
20. The Pillsbury Co. PAC	8/29/86	200.00	Roger Headrick	200.00
21. Republican Party of Florida Federal Campaign Committee	3/13/85	1,000.00	Ash Verlander Victory Committee	1,000.00

*/ Reported as a conduit contribution, but the committee through which it passed was not identified.

Friends of Mattingly

Contributions Earmarked Through
Political and Other Committees

Conduit Committee	Contribution Check Date	Check Amount	Contributor Name	Share
22. Rockwell International Corp. Good Gov't Committee	2/14/85	$ 10.00	Ronald G. Rice	$ 10.00
	2/27/85	10.00	Unknown	10.00
	3/21/85	10.00	Unknown	10.00
	4/15/85	10.00	Unknown	10.00
	4/25/85	10.00	Ronald G. Rice	10.00
	5/16/85	10.00	Ronald G. Rice	10.00
	6/13/85	10.00	Ronald G. Rice	10.00
	7/18/85	10.00	Ronald G. Rice	10.00
	9/12/85	10.00	Ronald G. Rice	10.00
	10/15/85	10.00	Ronald G. Rice	10.00
	11/27/85	10.00	Ronald G. Rice	10.00
	12/12/85	10.00	Ronald G. Rice	10.00
	1/23/86	10.00	Ronald G. Rice	10.00
	2/19/86	10.00	Ronald G. Rice	10.00
	3/21/86	10.00	Ronald G. Rice	10.00
	4/3/86	10.00	Ronald G. Rice	10.00
	5/13/86	10.00	Ronald G. Rice	10.00
	6/12/86	10.00	Ronald G. Rice	10.00
	8/15/86	25.00	Ronald G. Rice	20.00
			Nicholas M. Torelli, Jr.	5.00
	9/5/86	10.00	Ronald G. Rice	10.00
	10/10/86	12.50	Ronald G. Rice	10.00
			Nicholas M. Torelli, Jr.	2.50
23. SBCA-PAC, Inc.	6/24/86	100.00	Stanley H. Hackett	100.00
24. Second District Republican Party	10/9/86	75.00	Mr. & Mrs. Charlie Curry	75.00
25. Skidaway Island Republican Club	2/27/86	125.00	Joseph J. Tribble	125.00
	2/27/86	10.00	Harriet Scandone	10.00

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Friends of Mattingly

Contributions Earmarked Through
Political and Other Committees
for Which Conduits Were Not Dislcosed

Conduit Committee	Contribution Check Date	Check Amount	Contributor Name	Share
26. Southern Bell Federal PAC	12/11/85	$ 50.00	James G. Perkins	$ 50.00
	9/4/86	25.00	Byron P. Rauschenberg	25.00
	9/4/86	100.00	Burt M. Cloud, Jr.	100.00
	9/24/86	100.00	James G. Perkins	100.00
27. Tattnall County Republican Party	cash	100.00	E. F. Sikes	100.00
28. The Tobacco Institute	5/22/85	1,000.00	The Loews/ Lorillard Public Affairs Committee	1,000.00
Total		$22,285.97		$22,285.97

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Reporting of Contributions From Political and Other Committees

Section 434(b)(3)(B) of Title 2 of the United States Code requires that each report disclose the identification of each political committee which makes a contribution to the reporting committee during the reporting period, together with the date and amount of any such contribution.

In addition, 11 C.F.R. § 104.3(a)(4)(ii) requires the itemization of receipts from all committees (including political committees and committees which do not qualify as political committees under the Act) which make contributions to the reporting committees during the reporting period.

The Committee's contribution records, copies of contributor checks and deposit slips were reviewed to determine whether all contributions from political and other committees were correctly itemized in the Committee's disclosure reports. It was determined that 87 such contributions, totalling $75,230.39, were not reported as required. Of these contributions, 66 items, totalling $49,020.33, were not found on Committee disclosure reports (Attachment 6). Nine contributions, totalling $3,710.06, were found to have been reported in the name of individuals (Attachment 7), and 12, totalling $22,500.00, were reported at an incorrect amount causing a net underreporting of $7,275.00 (Attachment 8).

In the interim audit report, the Audit staff recommended that the Committee amend its reports to correctly itemize the 87 contributions from political committees and organizations. The Committee has not filed the amended reports.

Recommendation #6

The Audit staff recommends that this matter be referred to the Office of General Counsel.

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Contributions From Political and Other Committees Apparently Not Reported

	Contributing Committee Name	Contribution Date	Contribution Amount	Source
1.	American Bankers Association	3/12/86	$2,500.00	1
2.	Apartment PAC	3/14/86	1,000.00	1
3.	Appling County Republican Club	7/14/86	56.00	1
4.	Associated General Contractors of America PAC	4/05/85	3,000.00	1
5.	Baldwin County Republican Party	4/11/86	1,000.00	1
6.	Banc One PAC	9/24/86	500.00	3
7.	Betty Jo Williams Re-election Campaign	6/23/86	125.00	1
8.	Bipartisan PAC Mellon Bank Corp.	4/03/85	500.00	2
9.	Build PAC	4/23/85	1,000.00	1
10.	Burlington Indust. Good Gov't	11/06/86	500.00	3
11.	California Federal Savings Public Affairs Committee	4/04/85	500.00	2
12.	Carl Harrison Campaign Fund	7/01/86	250.00	1
13.	Charter Med. Corp. Empl. Committee	4/01/86	500.00	3
14.	Chatham Co. Republican Women's Club	9/16/86	100.00	1

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	Contributing Committee Name	Contribution Date	Contribution Amount	Source
15.	Citizens and Southern Georgia Corp. Better Gov't. Fund	7/25/85	$1,000.00	2
16.	Civic Involement Program Gen. Motors	6/03/85	2,000.00	1
17.	Committee to Elect Ken Suffridge	6/29/86	125.00	1
18.	Committee to Elect Lillian Webb	8/20/86	150.00	1
19.	Committee to Elect Princella Howard Dixon to Congress 5th District	6/30/86	125.00	1
20.	Committee to Re-elect Jim McDuffie	6/18/86	125.00	1
		6/23/86	125.00	1
21.	CONTEL PAC	7/24/85	1,000.00	1
22.	Dorothy Felton Committee	7/01/86	125.00	1
23.	EMPAC-Dow Chem	9/30/86	200.00	1
24.	Fulton Co. Republican Women's Club	10/06/86	100.00	1
25.	Gas PAC	5/23/85	3,000.00	1
26.	General Dynamics Vol. PCP	2/18/85	1,000.00	2
		5/28/86	1,000.00	1
27.	Georgia Federal Savings PAC	6/11/86	250.00	3
28.	Gold Kist PAC for Farmers	4/08/85	1,000.00	2
		8/13/85	1,000.00	1

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	Contributing Committee Name	Contribution Date	Contribution Amount	Source
29.	Greater Fayette Republican Women's Club	9/30/86	$ 25.00	1
30.	Harris FEPAC	8/09/85	2,000.00	1
31.	K-Mart Non-Partisan PAC	10/19/86	500.00	3
32.	King and Spaulding Non-Partisan PAC	10/23/86	1,000.00	3
33.	Kit Townsend Re-election Fund	10/26/86	75.00	1
34.	Lockheed PAC	6/07/85	1,000.00	1
35.	Machine Tool PAC	10/01/86	1,000.00	3
36.	McKesson Corp. Empl. PAC	9/29/86	1,000.00	3
37.	Med. Center Bank PAC	9/12/85	250.00	2
38.	MGH Mgt. PAC One	8/19/86	500.00	3
39.	Morrison PAC	10/16/86	500.00	1
40.	Morton-Thiokol PAC	3/31/86	1,000.00	3
41.	National Association of Convenience Stores	4/23/86	1,000.00	1
42.	National Data Corp. PAC	10/28/86	600.00	1
43.	National Fisheries Institute PAC	10/15/86	1,000.00	3
44.	NCNB Corp. PAC	3/26/86	500.00	2
45.	NECA-Electrical Construction PAC	4/10/85	1,000.00	1
46.	NRA Political Victory Fund	10/24/85	1,000.00	3
47.	Perpetual Savings Bank (FSB PAC)	10/30/86	500.00	3

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	Contributing Committee Name	Contribution Date	Contribution Amount	Source
48.	RJR Good Gov't Fund	3/12/86	$1,000.00	1
49.	Scott PAC	6/03/85	1,000.00	1
50.	Seaboard System Railroad PAC	7/29/85	1,000.00	1
51.	Senator John Warner Invitational Golf Tournament Committee	12/31/85	1,839.33	1
52.	Shoney's	6/21/85	500.00	1
53.	South Carolina National Bank PAC	2/25/85	500.00	2
54.	Sun Bank Inc. PAC (SUNPAC)	4/05/85	500.00	2
55.	SW Better Gov't Committee	10/08/86	1,000.00	3
56.	Thea Powell Campaign Account	6/20/86	125.00	1
57.	Trust Company of Georgia Good Government	4/09/85	500.00	2
		6/14/85	200.00	1
		8/09/85	300.00	1
58.	Union Camp PAC	6/12/85	500.00	1
59.	United Cable TV Corporation PAC	7/08/86	250.00	3
60.	Vulcan Materials Company PAC	2/20/86	500.00	3
61.	Wall and Ceiling PAC/WACPAC	6/18/85	1,000.00	1
		Total	$49,020.33	(66 items)

Source:

1. From copies of contribution checks.
2. From Committee deposit slips.
3. From contributing committee reports.

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Attachment 7

Contributions From Other Committees Reported In the Name of An Individual

	Committee Name	Contribution Date	Contribution Amount	Reported Contributor
1.	Atlanta Gas PAC	6/24/86	$ 500.00	Mr. Thomas H. Benson
		10/01/86	600.00	Mr. Don Cargill
2.	Committee To Re-Elect Leo Center	10/16/86	150.00	Mr. Leo E. Center
3.	Friends of Danner	12/18/86	250.00	Mr. Robert M. Danner
4.	John H. Harland PAC	9/26/86	300.00	Mr. J. William Robinson
5.	John Linder Campaign	5/20/85	250.00	Mr. John Linder
6.	Nickles for U.S. Senate	12/12/86	1,000.00	Hon. Don Nickles
7.	Sue Childers Campaign Fund	3/06/86	360.06	Ms. Sue Childers
8.	Tom Lowe Campaign Fund	9/30/86	300.00	Mr. Thomas M. Lowe, Jr.
	Total Contributions		$3,710.06	(9 items)

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Attachment 8

Contributions From Other Committees
Reported at an Incorrect Amount

	Committee Name	Contribution Check Date	Check Amount	Reported Amount	Difference
1.	Associated General Contractors of America PAC	7/11/86	$ 4,000.00	$3,500.00	(500.00)
2.	Campaign America	4/10/86	$ 5,000.00	$4,000.00	(2,000.00)
		4/18/86	1,000.00		
3.	Committee for a Pro-Life Congress	10/21/86	1,000.00	1,000.00	
		10/30/86	1,000.00	2,000.00	1,000.00
4.	Diamond Shamrock Employees PAC	9/26/86	1,000.00	2,000.00	1,000.00
5.	HALLPAC-Federal	6/27/86	2,000.00	1,000.00	(1,000.00)
		8/19/86	2,000,00	1,000.00	(1,000.00)
6.	PG & E Employees Federal Good Gov't Fund	10/10/86	1,000.00	100.00	(900.00)
7.	Philip Morris PAC	7/14/86	1,000.00	100.00	(900.00)
8.	Tenneco Employees Good Gov't Fund	5/15/86	1,000.00	500.00	(500.00)
9.	Textron PAC	6/03/86	2,500.00	25.00	(2,475.00)
	Total		$22,500.00		(7,275.00)
			(12 contributions)		

E. Misstatements of Financial Activity

Section 434(b)(1), (2) and (4) of Title 2 of the United States Code requires a committee to report the amount of cash on hand at the beginning of each reporting period and the total sum of all receipts and disbursements for the reporting period and calendar year.

The Audit staff's reconciliation of the Committee's reported activity to its bank records revealed the following misstatements:

1. 1985

(a) Beginning Balance

The reported beginning balance as of January 1, 1985 was overstated by $8,624.27. This difference was not identified in that it appears to relate to activity prior to the beginning of the audit period. No bank records were reviewed for the pre-1985 activity.

(b) Receipts

For the period January 1, 1985 to December 31, 1985, the Committee's reported receipts were overstated by a net amount of $11,662.20. The components of this misstatement are as follows:

1985 Receipts as Reported		$1,569,436.39
- Receipt reported from the National Republican Senatorial Committee not actually received	($25,000.00)	
- Exempt accounting services included in reported receipts total	(864.63)	
- Interest disclosed but not included in reported receipts total	339.04	
- Contributions reported twice	(1,500.00)	
- Unreported in-kind contributions	2,298.76	
- Audit adjustment to compensate for Beginning Cash Balance discrepancy	8,624.27	
- Unexplained Difference	4,440.36	(11,662.20)
Adjusted 1985 Receipts		$1,557,774.19

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The unexplained difference and the adjustment to compensate for the beginning cash balance appear to be due, at least in part, to an attempt by the Committee to bring their reported cash into balance with their general ledger cash balance at June 30, 1985.

(c) Disbursements

For the period January 1, 1985 to December 31, 1985, the Committee's reported disbursements were understated by a net amount of $1,095.47. The components of this misstatement are as follows:

1985 Disbursements as Reported		$578,280.97
- Unreported disbursements and reported checks, later voided (net)	$ (904.70)	
- Unreported in-kind contributions	2,298.76	
- Unexplained Difference	(298.59)	1,095.47
Adjusted 1985 Disbursements		$579,376.44

2. 1986

(a) Receipts

For the period January 1, 1986 to December 31, 1986, the Committee's reported receipts were overstated by a net amount of $37,756.17. The components of this misstatement are as follows:

1986 Receipts as Reported		$3,286,877.06
- Unreported interest income	$ 5,526.52	
- Unreported in-kind contributions	3,472.91	
- Incorrectly-reported PAC contributions (net)	7,275.00	
- Unexplained Difference	(54,030.60)	(37,756.17)
Adjusted 1986 Receipts		$3,249,120.89

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The unexplained difference may be the result of anattempt to balance committee reports to its accounting records. The post general election report showed substantially more in receipts than bank records indicate was deposited into Committee accounts. It is also noted that the Audit staff was unable to find support for a portion of the $155,069.05 in unitemized contributions reported during the period or to reconcile the Committee's automated contributor file to reported amounts. Given the overstatement of disbursements described below, an attempt to balance reported cash to actual cash on hand would require an offsetting overstatement of receipts.

(b) Disbursements

For the period January 1, 1986 to December 31, 1986, the Committee's reported disbursements were overstated by a net amount of $42,006.80. The components of this misstatement are as follows:

1986 Disbursements as Reported			$4,540,971.29
-	Reported interaccount transfers	($50,590.78)	
-	Unreported in-kind contributions	5,647.19	
-	Unreported disbursements	4,374.83	
-	Misc. and unexplained Difference	(1,438.04)	(42,006.80)
Adjusted 1986 Disbursements			$4,498,964.49

No adjustment for apparent unreported contributions from other Committees has been made pending an explanation of the receipts overstatement. These apparent unreported contributions total $49,020.33 (See Exhibit D), $28,089.33 in 1985 and $20,931.00 in 1986.

Committee officials offered no explanation for these misstatements. Copies of schedules detailing the explained differences were provided to the Committee.

In the Interim Audit Report, the Audit staff recommended that the Committee:

1. File Comprehensive Amendments for calendar years 1985 and 1986 correcting reported receipts, disbursements and cash on hand.

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2. Provide an explanation for the $54,030.60 overstatement of receipts for calendar year 1986 described above as "Unexplained Difference."

The Committee has not filed amended reports as requested and the response to the Interim Audit Report provided no information on the 1986 unexplained overstatement of receipts.

Recommendation #7

The Audit staff recommends that this matter be referred to the Office of General Counsel.

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Failure to Maintain Receipts Records

Section 102.9(a) of Title 11 of the Code of Federal Regulations states that the treasurer of a political committee shall keep an account by any reasonable accounting procedure of all contributions received by or on behalf of the political committee.

In reviewing the Committee's receipt records, reported receipts and bank records, it was determined that for the periods January 1 to June 30, 1985 (Mid Year 1985 Report), and October 16 to November 24, 1986 (Post General Election Report), the Committee's receipt records were incomplete. For the Mid Year 1985 Report, the amount for which no records were found was $22,143.05. This amount was determined using corrected beginning and ending cash balances, a corrected reported disbursement total and available receipt records.

For the Post General Election Report, the Committee's records for individual contributions total $132,637.59 less than reported individual contributions. A portion of this difference may be the result of the unexplained difference noted in the "Misstatement of Financial Activity" finding discussed above (see Exhibit E). As noted in Finding E, that difference may be the result of an attempt by the Committee to balance reported ending cash to the recorded ending cash. Given that disbursements are overstated due to the Committee erroneously reporting interaccount transfers, a corresponding overstatement in receipts would be required to balance reported ending cash. Any such overstatement would represent reported contributions which the Committee did not actually receive and hence reduce the amount of undocumented reported receipts.

In addition, in the two reporting periods prior to the Post General Election Report, the Committee had not entered into their automated contributor data base contributions of less than $100.00. In support of those contributions the Committee maintained copies of contributor checks in a file separate from other contribution files. In those periods, the reported contributions could be reconciled to committee records using those separate files in conjunction with the automated data base. Committee officials explained that this practice was instituted due to heavy volumes of small contributions in those periods. In the Post General Election Report period, no such separate records were found even though contribution volume appeared to remain heavy. Therefore, a portion of the undocumented receipts may represent small contributions not entered into the automated contribution file and for which no separate record was available for audit.

Committee officials offered no explanation for this apparent failure to maintain records.

In the Interim Audit Report, the Audit staff recommended that the Committee:

1) Explain the discrepancies between recorded and reported contributions for the Mid Year and Post General Election Reports; and

2) Supply copies of receipt records to document the amounts noted above.

The Committee's response to the Interim Audit Report contained no information concerning this matter.

Recommendation #8

The Audit staff recommends that this matter be referred to the Office of General Counsel.

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Reporting of Debts and Obligations

Section 434(b)(8) of Title 2, United States Code, in part, requires each report filed by the treasurer of a political committee to disclose the amount and nature of outstanding debts and obligations owed by the committee.

Section 104.11(a) of Title 11, Code of Federal Regulations states, in part, that debts and obligations shall be continuously reported until extinguished. In addition, 11 C.F.R. § 104.11(b) states, in part, that debts of $500 or less shall be reported as of the time payment is made or no later than 60 days after the obligation is incurred and that debts in excess of $500 shall be reported at the time of the transaction.

The Audit staff performed a review of the Committee's disbursement records to determine whether disbursements which required disclosure as debts owed by the Committee were reported properly on the FEC disclosure reports.

The results of testing disbursements on a sample basis indicated that we are 95% certain that there are between 53 and 127 reportable debts in 1986. At the exit conference, the Committee was instructed to amend the following FEC disclosure reports to disclose on line 10 (Schedule D) all reportable debts: Year-End '85, April Quarterly '86, July Quarterly '86, Pre-Primary '86, October Quarterly '86, Pre-General '86, Post-General '86, and Year-End '86. It should be noted that the Committee did not report any debts owed on these reports, except for an outstanding bank loan, until the Post-General '86 report.

A Committee representative commented that debts were not reported because the Committee did not maintain an accounts payable ledger.

In the Interim Audit Report, the Audit staff recommended that the Committee file amended reports to disclose any previously undisclosed debts which were outstanding at the close of the 7 report periods named above.

Recommendation #9

The Audit staff recommends that this matter be referred to the Office of General Counsel.

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SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 MAY 15 AM 10: 07

MUR 2989
STAFF MEMBER: Elizabeth Campbell

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

RESPONDENTS:	Friends of Mattingly and Donald P. Gammon, as treasurer
	72 individuals (See Attachment II)
	17 political committees (See Attachment I(49-53))
	55 corporations (See Attachment I(56-66))
RELEVANT STATUTES:	2 U.S.C. § 432 2 U.S.C. § 434(b) 2 U.S.C. § 441a(a) 2 U.S.C. § 441a(f) 2 U.S.C. § 441b(a) 11 C.F.R. § 104.3(a)(4)(ii) 11 C.F.R. § 104.11 11 C.F.R. § 110.6(c)(3)
INTERNAL REPORTS CHECKED:	Audit report, audit workpapers; disclosure reports
FEDERAL AGENCIES CHECKED:	None

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I. GENERATION OF MATTER

This matter was generated by an audit conducted by the Federal Election Commission ("the Commission") in accordance with the Federal Election Campaign Act of 1971, as amended ("the Act"), pursuant to 2 U.S.C. § 438(b). The audit covered the period from January 1, 1985 through December 31, 1986. Friends of Mattingly ("the Committee") registered with the secretary of

the U.S. Senate on October 1, 1979 as the principal campaign committee for Mack Mattingly, Republican candidate for Senate from Georgia. The Committee amended its statement of organization on March 17, 1982, to include activity from July 1, 1981 forward, as activity for Mattingly's 1986 Senate campaign. The Committee filed its termination report on October 31, 1987.

II. FACTUAL AND LEGAL ANALYSIS

A. Excessive Contributions

1. Excessives from Individuals and Committees discovered during the Commission's Audit

The Act states that no person shall make contributions to a candidate and his authorized political committees with respect to any election for federal office, which in the aggregate, exceeds $1,000.00. 2 U.S.C. § 441a(a)(1)(A). The Act further provides that no multicandidate political committee may make contributions to a federal candidate and his authorized political committees with respect to any election for federal office, which aggregate in excess of $5,000.00. 2 U.S.C. § 441a(a)(2)(A). A multicandidate committee is defined by the Act as a political committee which has been registered for at least six months, has received contributions for federal elections from more than 50 persons and has made contributions to at least five federal candidates. 2 U.S.C. § 441a(a). Other political committees which are not multicandidate committees may contribute only $1,000.00 per candidate per election. See 11 C.F.R. § 110.1. No candidate or authorized campaign committee shall knowingly accept

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any contribution in violation of the provisions of the Act. 2 U.S.C. § 441a(f).

The Commission regulations[1] define "with respect to any election" to mean that a contribution designated for a particular election will count as a contribution towards the election designated by the contributor. 11 C.F.R. § 110.1(a)(2)(i). Contributions may be designated to a primary election after the date of the primary only to the extent that the contribution does not exceed the "net debts outstanding"[2] from the primary election. Id. An undesignated contribution will go towards the primary if it is made on or before the date of the primary, or towards the general election if it is made after the date of the

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1. Note that the regulations governing this case are those in effect at the time of the audit. Therefore, citations from Parts 104 and 110 of Title 11 of the Code of Federal Regulations refer to Regulations in effect prior to the April 8, 1987 amendments to those sections.

2. In order to determine whether a Committee has any "net debts outstanding" from a particular election, the Committee must figure out the difference between the total of the Committee's unpaid debts and obligations incurred with respect to the election, and the total of the Committee's cash on hand and receivables available to pay those debts and obligations. 11 C.F.R. § 110.1(b)(3)(ii); See also, Advisory Opinion 1984-32, 1 Fed. Election Camp. Fin. Guide [CCH] ¶ 5777.

11 C.F.R. § 110.1(b)(3)(ii) further provides that "net debts outstanding" shall also include the estimated cost of raising funds to liquidate the debts remaining from the election or if the candidate will not be a candidate for the next election, estimated costs associated with termination of political activity. However, 11 C.F.R. § 110.1(b)(3)(ii) is not applicable here because it was a 1987 regulation and thus was not in effect at the time of this audit. Moreover, even if the regulation was in effect at the time of the audit, fundraising costs would not be included because the Committee had a surplus after the primary election, and termination costs would not be considered because Mattingly was a candidate in the general election.

primary. 11 C.F.R. § 110.1(a)(2)(ii). A contribution which represents contributions by more than one person shall indicate on the contribution instrument or on an accompanying written instrument signed by all contributors, the amount to be attributed to each contributor. 11 C.F.R. § 104.8(d).

The results of the Commission's Audit showed that the Committee finished the primary election with a surplus of $193,202.10. Accordingly, under 11 C.F.R. § 110.1(a)(2)(i), the Committee could not legally accept contributions designated for the primary after August 12, 1986, the date of the primary.[3]

The Commission's examination and audit determined that the Committee accepted 704 apparent excessive contributions from 502

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3. The Commission rejected the Committee's assertion that the auditors failed to include $405,368.22 in post-primary disbursements as primary expenses because a review of the Committee's disclosure reports indicate that if that were true, almost all disbursements made thirty days after the primary were primary disbursements. This assertion is unlikely given that the Committee did not report any primary debts, the candidate was not seriously challenged in the primary in which he received 95% of the votes, and the primary was held in August, less than three months before a close general election.

The Commission also rejected the Committee's claim that contract obligations assumed prior to the primary were all primary related. Pursuant to 11 C.F.R. § 100.8(a)(2), a written contract, including a media contract, promise, or agreement to make an expenditure is an expenditure as of the date such contract, promise or obligation is made. The Committee said that part of its campaign strategy called for the husbanding of committee funds to discourage potential opponents. To accomplish this, it contracted with media and campaign consultants in 1985 but the contract payments were delayed until after the primary. However, the Committee has submitted no supporting documentation to demonstrate that all or part of these obligations were incurred before the primary, and it did not report any contractual obligations as debts in the reports filed prior to the primary. Moreover, the date that an obligation is incurred does not automatically determine to which election the expenditure is attributable. (For more information, see Final Audit Report, Exhibit A.)

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individuals totaling $344,840.00.[4] The audit also showed that it appears the Committee accepted excessive contributions from 17 committees, totaling $31,833.05.[5] Therefore, this Office recommends that the Commission find reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. § 441a(f). In addition, this Office recommends that the Commission find reason to believe that all 17 committees violated 2 U.S.C. § 441a(a); and reason to believe that the 72 individuals

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4. Of the total amount, $2,250.00 was refunded but the refunds were not timely. The remaining $342,590.00 has not been refunded.

5. The total amount of excessive contributions from committees has been adjusted since the interim audit report. The contribution of $5,723.22 from Floridians for President Reagan's Majority ("Floridians") is not included as an excessive because it is not an unregistered committee; however, it has since been learned that Floridians is registered with the Commission as a joint fundraiser for Senators Mattingly and Paula Hawkins. See MUR 2577. Under the terms of the joint fundraising agreement, the Mattingly Committee should have only received half of the fundraising proceeds. However, after deducting expenses, the remaining fundraising proceeds were $6,723.22, all of which went to Mattingly. Thus, the Mattingly Committee received $3,363.71 more than it was entitled to and the Hawkins Committee received $3,363.71 less. By allowing all these fundraising proceeds to be distributed to the Mattingly Committee, the Hawkins Committee gave a contribution to the Mattingly Committee of $3,363.71, which was excessive by $2,363.71, since the Hawkins Committee was not a multicandidate committee and could only contribute $1,000.00 to the Mattingly Committee.

Accordingly, the amount of excessive contributions from committees has been revised to eliminate the $5,723.22 excessive amount from Floridians and include a $2,363.71 excessive amount from the Hawkins Committee, leaving the total excessive amount at $31,833.05. (For more information, see Final Audit Report, Exhibit A, p. 8 of 9.)

violated

2 U.S.C. § 441a(a)(1)(A).[7]

2. **Excessives from NRSC Direct-To Auto Program**

The Committee entered into a written agreement with the National Republican Senatorial Committee ("NRSC") to participate in the NRSC's "Direct-To Program." The Direct-To Program was a fundraising effort designed to permit NRSC contributors to earmark their contributions to a particular Republican Senatorial candidate. Funds from the Direct-To Program were transmitted to the recipient committees both by contributor checks and by NRSC checks.

In Common Cause v. FEC, 729 F. Supp. 148 (D.D.C. 1990), the court held that the contributions sent to the NRSC through its Direct-To Auto program (one of the 5 programs of the NRSC's Direct-To program), were not earmarked within the meaning of 11 C.F.R. § 110.6(b) and that the NRSC exercised some "direction

7. A number of individual respondents were persons who made up the association and sales force of A.L. Williams & Associates, Inc., and their contribution checks included a notation of a photo opportunity with President Reagan. In MUR 2668, Robert Mason, finance director for Friends of Mattingly, testified that a photo opportunity with the President was available to individuals who made a contribution of $2,500.00 to Mattingly. See MUR 2668.

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or control over those contributions within the meaning of 11 C.F.R. § 110.6(d)." Pursuant to 11 C.F.R. § 110.6(d), earmarked contributions should be treated as contributions from the original source to the candidate unless the intermediary exercises direction and control over the funds. As a result of the court's decision, on February 15, 1990, the Commission found probable cause to believe that the NRSC and its treasurer violated 2 U.S.C. § 441a(h) by exceeding the $17,500.00 limitation on contributions to 12 Senate candidates. See MUR 2282.

The Mattingly Committee received $189,788.83 in excessive contributions from the NRSC as a result of the Direct-To Auto program.[8] Therefore, this Office recommends that the Commission find reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. § 441a(f) for accepting $189,788.83 in excessive contributions from the NRSC.

B. Corporate Contributions

All corporations are prohibited under 2 U.S.C. § 441b from making a contribution or expenditure in connection with any federal election to political office. No candidate or political committee shall knowingly accept or receive any corporate contribution. 2 U.S.C. § 441b(a). Based on the examination and

8. The Committee received a total of $208,063.96 from the NRSC Direct-To Auto program. After deducting the NRSC's contribution limit of $17,500.00, and the remaining coordinated expenditure limitation of $775.13, the total amount of excessives is $189,788.83. See 2 U.S.C. §§ 441a(h) and 441a(d). See also, MUR 2282.

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audit of the Committee, it appears that the Committee received 187 prohibited corporate contributions from 152 corporate entities[9], totaling $30,610.59. Therefore, this Office recommends that the Commission find reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. § 441b(a).[10]

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C. Failure to Report Earmarked Contributions

Pursuant to 2 U.S.C. § 441a(a)(8), contributions which are earmarked for a particular candidate or otherwise directed through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate. The recipient of earmarked contributions must identify both the conduit and the original source of the contribution. 11 C.F.R. § 110.6(c)(3).

As noted is section A above, the Committee entered into a

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9. The Commission's auditors verified the corporate status of the 152 corporate entities by confirming their corporate status with the secretary of state where the corporation is located.

10. Three of these contributions were refunded, and part of a fourth, but the refunds were not timely.

written agreement with the NRSC to participate in the NRSC's "Direct-To Program." The Committee received a total of $351,991.61 in earmarked contributions from the NRSC's Direct-To Program.[12] Of that amount, $98,016.04 of that amount was reported by the Committee as earmarked but the Committee failed to disclose the remaining $253,975.57 as earmarked through the NRSC.

In addition, the Committee participated in a joint fundraising event in 1985 and again in 1986, sponsored by the Senator John Warner Golf Tournament Committee ("GTC").[13] The Committee received 28 earmarked contributions conduited from GTC in 1985 totaling $15,283.44, and 29 earmarked contributions in 1986, totaling $19,608.34, but failed to disclose them as earmarked contributions.

Finally, in the process of its review of the Committee, the Commission's auditors also discovered that the Committee received eighty (80) additional earmarked contributions from twenty-eight (28) political committees, totaling $22,285.97, for which the conduit was not reported.[14]

Therefore, this Office recommends that the Commission find reason to believe that Friends of Mattingly and Donald P. Gammon,

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12. In footnote 7 it was noted that the Committee received a total of $208,063.96 from the NRSC Direct-To Auto program. The Direct-To Auto program is only one of five programs of the NRSC's Direct-To Program. As noted above, the total amount of contributions the Committee received from all of the Direct-To Programs was $351,991.61.

13. The 1985 Committee was registered with the Commission as the "John Warner Invitational Golf Tournament Committee."

14. Only 1 of the 80 contributions was reported as an earmarked contribution.

as treasurer, violated 11 C.F.R. § 110.6(c)(3) for failing to identify the conduit for $311,153.32 in earmarked contributions.

D. Reporting Violations

Pursuant to 2 U.S.C. § 434(b)(3)(B), reports filed by a political committee must disclose the identification of each political committee which made a contribution to the reporting committee during the reporting period together with the date of receipt and amount of such contribution. In addition, the Commission's regulations require the itemization of receipts from all committees (including political committees and committees which do not qualify as political committees under the Act) which make contributions to the reporting committees during the reporting period, together with the date of receipt and amount of such contribution. 11 C.F.R. § 104.3(a)(4)(ii).

The Committee did not properly report 87 contributions from committees, totaling $75,230.39. Nine of these contributions were incorrectly reported as coming from individuals, rather than from committees; twelve contributions disclosed an incorrect amount, resulting in a net underreporting of $7,275.00; and sixty-six contributions, totaling $49,020.33, were not reported at all.

Reports filed by a committee must disclose the cash on hand at the beginning of the reporting period and the total amount of receipts and disbursements for the reporting period and calendar year. 2 U.S.C. §§ 434(b)(1), 434(b)(2) and 434(b)(4). The Committee's 1985 and 1986 reports contained several misstatements

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of financial activity. First, the Committee's 1985 cash on hand was overstated by $8,624.27. See 2 U.S.C. § 434(b)(1). Overall, in 1985, the Committee's receipts were overstated by $11,662.20 disbursements were understated by $1,095.47. See 2 U.S.C. §§ 434(b)(2) and 434(b)(4). In addition, in the Committee's 1986 reports, receipts were overstated by $37,756.17 and disbursements were overstated by $42,006.80. Id.

A political committee must report the amount and nature of all outstanding debts and obligations owed by such committee. 2 U.S.C. § 434(b)(8). Outstanding debts and obligations must be continuously reported until extinguished. 11 C.F.R. § 104.11(a). If the debt or obligation exceeds $500, it must be reported as of the time of the transaction. 11 C.F.R. § 104.11(b). If the debt or obligation does not exceed $500, it must be reported as of the time payment is made or no later than 60 days after the obligation is incurred, whichever comes first. Id.

During the examination and audit, the auditors, based on a sample review of disbursements, estimated that the Committee had between 53 and 127 reportable debts in 1986. However, the Committee reported only one debt and it was not reported until the Committee filed its 1986 Post General Election report. The Committee representative said that debts were not reported because the Committee did not maintain an accounts payable ledger.

Therefore, this Office recommends that the Commission find reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. § 434(b) for failure to properly

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report 87 contributions from committees, for misstatements of financial activity, and for failure to report debts and obligations.

E. Failure to Maintain Accurate Record of Receipts

Pursuant to 11 C.F.R. § 102.9(a), the treasurer of a political committee shall use a reasonable accounting procedure to maintain an account of all contributions received by or on behalf of a political committee. See 2 U.S.C. § 432(c). For contributions that exceed $50, the account must include the name and address of the contributor and the amount and date of receipt of the contribution. 11 C.F.R. § 102.9(a)(1). If contributions from a contributor exceed $200 in the aggregate, then the account must include the name and address of the contributor, the contributor's employer and occupation, and the date of receipt and amount of each contribution. 11 C.F.R. § 102.9(a)(2). If the contribution is from a political committee, regardless of the amount, the account must include the name and address of the political committee and the date of receipt and amount of each contribution. 11 C.F.R. § 102.9(a)(3). See also 2 U.S.C. §§ 434(c)(1)-(4). A treasurer is required to keep these records for three years after the report is filed. 2 U.S.C. § 432(d).

The Committee did not maintain a complete record of receipts for the 1985 Mid Year and 1986 Post-General Election reporting period. The Commission's auditors determined that the Committee did not have records for $22,143.05 in receipts reported on the 1985 Mid Year report, and also did not have records for

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$132,637.59[15] in receipts reported on the Post-General election report. Therefore, this Office recommends that the Commission find reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. § 432.

III. RECOMMENDATIONS

1. Find reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), 441b(a), and 11 C.F.R. § 110.6(c)(3).

2. Find reason to believe that the following individuals violated 2 U.S.C. § 441a(a)(1)(A):

   (1) M.C. Anderson
   (2) Kenneth W. Anderton
   (3) Mr. J.E. Barrow, Jr.
   (4) John Treacy Beyer
   (5) Ron Bloomingkemper
   (6) Mr. Clayton P. Boardman, Jr.
   (7) Mr. Carl Bolch, Jr.
   (8) Marion R. Buisson
   (9) Mr. R.M. Channell
   (10) Donald J. Childress
   (11) John A. Conant
   (12) Walter L. Conner,
   (13) Cook and Company[16]
   (14) Mr. Lovick P. Corn

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15. The Commission's interim audit report notes two possible explanations for the Committee's incomplete receipts records. One, it may be the result of an attempt by the Committee to balance its reported ending cash to the recorded ending cash. Given that disbursements are overstated due to the Committee erroneously reporting inter-account transfers, a corresponding overstatement in receipts would be necessary to balance reported ending cash. Any such overstatement would represent reported contributions which the Committee did not actually receive and hence reduce the amount of undocumented reported receipts. The other explanation is that because the Committee stopped entering contributions of less than $100 into its contributor data base several months before the election, this figure may represent a large number of small contributors for which no separate records are available.

16. Cook and Company is not a corporation. The three contribution checks which included the excessives were attributed to three different individuals, but they were all drawn from the same Cook and Company account.

(15) Thomas G. Cousins
(16) Theresa C. Crossland
(17) Lloyd H. Darby, III
(18) Mr. Eugene B. Dawson
(19) Frank F. Dineen
(20) Mr. J. Roy Duggan
(21) Carol Falcone
(22) Mr. William A. Fickling, Jr.
(23) Thomas J. Halpin
(24) Thomas S. Hartzog
(25) Melita E. Hayes
(26) Mark D. Hurst
(27) Susan D. Hurst
(28) Mr. A. Jalil
(29) Jacob S. Jernigen
(30) Mr. John B. Keeble
(31) Eugene Kelly
(32) Mr. A.T. Kennedy
(33) Ms. Claire A. King
(34) P.S. Knox, Jr.
(35) Andrew Gay Labrow
(36) Willard Lasseter
(37) Mr. C.M. Leger
(38) Ronald S. Leventhal
(39) Charles A. Lotz, Jr.
(40) Mr. Frank Love, Jr.
(41) Mr. Albert L. Luce, Jr.
(42) Mr. George E. Luce
(43) George A. Martonik
(44) Todd McMahon
(45) Jane A. Miller
(46) Mr. A. Minis, Jr.
(47) R. Danny Murray
(48) Mr. W.A. Orender
(49) Mr. C.L. Patrick
(50) Mr. Bryce Peterson
(51) Mr. Joe W. Rogers, Jr.
(52) John M. Roig
(53) Mr. Gary W. Rollins
(54) Dennis Schecter
(55) Mr. W.L. Shirley
(56) Mr. Rankin M. Smith
(57) Mr. John M. Stuckey, Jr.
(58) Cynthia Thawley
(59) Mr. William Timmons
(60) J. Lloyd Tomer
(61) Mr. Maurice J. Towery
(62) Robert Lee Turley
(63) Michael R. Utz
(64) Lafayette Walker
(65) Randall Walker
(66) Richard A. Walker
(67) Richard K. Whitehead, Jr.
(68) Mr. Claude Williams, Jr.

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(69) Emory Winship
(70) Ms. Emily Woodruff
(71) J. Barnett Woodruff
(72) Harlen Zeitler

3. Find reason to believe these political committees violated 2 U.S.C. § 441a(a):

(1) A.L. Williams & Associates PAC, Inc. and Jack Smith, as treasurer
(2) American Financial Services Association PAC and Thomas L. Thomas, as treasurer
(3) Associated General Contractors PAC and John R. Gentille, as treasurer
(4) Bankers Trust New York Corporation Political Action Committee and Nancy C. O'Connor, as treasurer
(5) Citizens & Southern Georgia Corporation Better Government Committee and James D. Dixon, as treasurer
(6) Committee to Re-Elect United States Senator Paula Hawkins and Genean McKinnon, as treasurer
(7) Flowers Industries Inc. Political Action Committe and Earl Quigg, as treasurer
(8) Gold Kist Political Action for Farmers, Inc. and Paul G. Brower, as treasurer
(9) Lockheed Employees' Political Action Committee and Stephen E. Chaudet, as treasurer
(10) The Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer
(11) The National Association of Life Underwriters PAC and Bruce C. Hendrickson, as treasurer
(12) Northrop Employees PAC and Sherry C. Levit, as treasurer
(13) Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer
(14) Prudential Insurance Company of America Federal PAC and Milan E. Johnson, as treasurer
(15) Public Service Political Action Committee and Roman Rice, as treasurer
(16) Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer
(17) United Technologies Corporation Political Action Committee and Donald E. Groce, as treasurer

4. Find reason to believe that these entities violated 2 U.S.C. § 441b(a):

(1) Dr. John C. Adams, Jr., P.C.
(2) A.G. Spanos Development, Inc.
(3) Armada Vehicle Rental, Inc.
(4) Avail-Ability Inc.
(5) Bibb Distributing Co.
(6) Bill Taylor & Associates
(7) Rose Briglevich, M.D., P.C.
(8) Brown Brothers Harriman & Co.
(9) Cathedral of Faith Church of God in Christ

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(10) Century 21 Cook Realty, Inc.
(11) Century 21 of the Southeast, Inc.
(12) Collins Brothers
(13) Consolidated Tape & Label Co.
(14) Gary Cooper Construction
(15) Curry Farm Supply
(16) Dixie Trucking Company
(17) Dunwoody Office Supply, Inc.
(18) Ellis Building Systems
(19) Family and Marriage Resources
(20) Farmers Tobacco Warehouse
(21) Fesperman Insurance Co.
(22) Folsom Construction Company
(23) Homeway Rentals of Montgomery
(24) Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc.
(25) Lex Jolley & Company, Inc.
(26) J&W Farms
(27) Lakeside Farm
(28) Maricom Electronics, Inc.
(29) Morris Brown College
(30) Morris Newspaper Corp.
(31) Alfred Hammack D/B/A
(32) Moultrie Surgical Assoc., P.C.
(33) OB-GYN Associates, P.C.
(34) Oral & Maxillofacial Surgery Associates
(35) Patrician Properties
(36) Pacelli High School
(37) Peoples' Transportation Services, Ltd.
(38) Pickett Pickett & Pickett
(39) Bill Pilgrim Enterprises, Inc.
(40) The Pinkerton & Laws Co.
(41) Reeves, Avary Associates
(42) William L. Reno and Associates
(43) Riverside Development
(44) Robert J. Shircliff and Associates
(45) Southern Energy
(46) Standard Southeast, Inc.
(47) Stricklands Pharmacy
(48) Stubbs Shipping Company
(49) Vaughn Lumber Company
(50) Ed Voyles Chrysler-Plymouth
(51) Bill Walker and Associates
(52) Weatherly & Associates, Inc.
(53) General Roofing Co. D/B/A
(54) Willis and Veenstra Investment Co.
(55) Wright Farms

5. Approve the attached letter and Factual and Legal Analysis to Friends of Mattingly and Donald P. Gammon, as treasurer.

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6. Approve letters and Factual and Legal Analyses to 72 individuals, 55 corporations, and 17 political committees based on the attached sample letters and Factual and Legal Analyses.

3/14/90
Date

Lawrence M. Noble
General Counsel

Attachments:
I. Audit referral materials
II. List of individuals who contributed more than twice their limit
III. List of corporate contributions which exceed $100
IV. Proposed Letter and Factual and Legal Analysis to Friends of Mattingly
V. Sample Letter and Factual and Legal Analysis to individuals
VI. Sample Letter and Factual and Legal Analysis to committees
VII. Sample Letter and Factual and Legal Analysis to corporations

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS
COMMISSION SECRETARY

DATE: MAY 18, 1990

SUBJECT: MUR 2989 - FIRST GENERAL COUNSEL'S REPORT DATED MAY 14, 1990

The above-captioned document was circulated to the Commission on Wednesday, May 16, 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	XXX
Commissioner Elliott	XXX
Commissioner Josefiak	XXX
Commissioner McDonald	
Commissioner McGarry	XXX
Commissioner Thomas	XXX

This matter will be placed on the meeting agenda for Tuesday, June 5, 1990.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2989
Friends of Mattingly and Donald P. Gammon, as treasurer	)	
72 individuals	)	
17 political committees	)	
55 corporations	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on June 19, 1990, do hereby certify that the Commission took the following actions in MUR 2989:

1. Decided by a vote of 5-0 to

   a) Find reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), 441b(a), and 11 C.F.R. § 110.6(c)(3).

   b) Find reason to believe that the following individuals violated 2 U.S.C. § 441a(a)(1)(A):

      (1) M.C. Anderson
      (2) Kenneth W. Anderton
      (3) Mr. J.E. Barrow, Jr.
      (4) John Treacy Beyer
      (5) Ron Bloomingkemper
      (6) Mr. Clayton P. Boardman, Jr.

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(7) Mr. Carl Bolch, Jr.
(8) Marion R. Buisson
(9) Mr. R.M. Channell
(10) Donald J. Childress
(11) John A. Conant
(12) Walter L. Conner
(13) Cook and Company
(14) Mr. Lovick P. Corn
(15) Thomas G. Cousins
(16) Theresa C. Crossland
(17) Lloyd H. Darby, III
(18) Mr. Eugene B. Dawson
(19) Frank F. Dineen
(20) Mr. J. Roy Duggan
(21) Carol Falcone
(22) Mr. William A. Fickling, Jr.
(23) Thomas J. Halpin
(24) Thomas S. Hartzog
(25) Melita E. Hayes
(26) Mark D. Hurst
(27) Susan D. Hurst
(28) Mr. A. Jalil
(29) Jacob S. Jernigen
(30) Mr. John B. Keeble
(31) Eugene Kelly
(32) Mr. A.T. Kennedy
(33) Ms. Claire A. King
(34) P.S. Knox, Jr.
(35) Andrew Gay Labrow
(36) Willard Lasseter
(37) Mr. C.M. Leger
(38) Ronald S. Leventhal
(39) Charles A. Lotz, Jr.
(40) Mr. Frank Love, Jr.
(41) Mr. Albert L. Luce, Jr.
(42) Mr. George E. Luce

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(43) George A. Martonik
(44) Todd McMahon
(45) Jane A. Miller
(46) Mr. A. Minis, Jr.
(47) R. Danny Murray
(48) Mr. W.A. Orender
(49) Mr. C.L. Patrick
(50) Mr. Bryce Peterson
(51) Mr. Joe W. Rogers, Jr.
(52) John M. Roig
(53) Mr. Gary W. Rollins
(54) Dennis Schecter
(55) Mr. W.L. Shirley
(56) Mr. Rankin M. Smith
(57) Mr. John M. Stuckey, Jr.
(58) Cynthia Thawley
(59) Mr. William Timmons
(60) J. Lloyd Tomer
(61) Mr. Maurice J. Towery
(62) Robert Lee Turley
(63) Michael R. Utz
(64) Lafayette Walker
(65) Randall Walker
(66) Richard A. Walker
(67) Richard K. Whitehead, Jr.
(68) Mr. Claude Williams, Jr.
(69) Emory Winship
(70) Ms. Emily Woodruff
(71) J. Barnett Woodruff
(72) Harlen Zeitler

c) Find reason to believe these political committees violated 2 U.S.C. § 441a(a):

(1) A.L. Williams & Associates PAC, Inc. and Jack Smith, as treasurer

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(2) American Financial Services Association PAC and Thomas L. Thomas, as treasurer
(3) Associated General Contractors PAC and John R. Gentille, as treasurer
(4) Bankers Trust New York Corporation Political Action Committee and Nancy C. O'Connor, as treasurer
(5) Citizens & Southern Georgia Corporation Better Government Committee and James D. Dixon, as treasurer
(6) Committee to Re-Elect United States Senator Paula Hawkins and Genean McKinnon, as treasurer
(7) Flowers Industries Inc. Political Action Committee and Earl Quigg, as treasurer
(8) Gold Kist Political Action for Farmers, Inc. and Paul G. Brower, as treasurer
(9) Lockheed Employees' Political Action Committee and Stephen E. Chaudet, as treasurer
(10) The Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer
(11) The National Association of Life Underwriters PAC and Bruce C. Hendrickson, as treasurer
(12) Northrop Employees PAC and Sherry C. Levit, as treasurer
(13) Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer

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(14) Prudential Insurance Company of America Federal PAC and Milan E. Johnson, as treasurer
(15) Public Service Political Action Committee and Roman Rice, as treasurer
(16) Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer
(17) United Technologies Corporation Political Action Committee and Donald E. Groce, as treasurer

d) Find reason to believe that these entities violated 2 U.S.C. § 441b(a):

(1) Dr. John C. Adams, Jr., P.C.
(2) A.G. Spanos Development, Inc.
(3) Armada Vehicle Rental, Inc.
(4) Avail-Ability Inc.
(5) Bibb Distributing Co.
(6) Bill Taylor & Associates
(7) Rose Briglevich, M.D., P.C.
(8) Brown Brothers Harriman & Co.
(9) Cathedral of Faith Church of God in Christ
(10) Century 21 Cook Realty, Inc.
(11) Century 21 of the Southeast, Inc.
(12) Collins Brothers
(13) Consolidated Tape & Label Co.
(14) Gary Cooper Construction
(15) Curry Farm Supply
(16) Dixie Trucking Company
(17) Dunwoody Office Supply, Inc.
(18) Ellis Building Systems

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(19) Family and Marriage Resources
(20) Farmers Tobacco Warehouse
(21) Fesperman Insurance Co.
(22) Folsom Construction Company
(23) Homeway Rentals of Montgomery
(24) Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc.
(25) Lex Jolley & Company, Inc.
(26) J&W Farms
(27) Lakeside Farm
(28) Maricom Electronics, Inc.
(29) Morris Brown College
(30) Morris Newspaper Corp.
(31) Alfred Hammack D/B/A/
(32) Moultrie Surgical Assoc., P.C.
(33) OB-GYN Associates, P.C.
(34) Oral & Maxillofacial Surgery Associates
(35) Patrician Properties
(36) Pacelli High School
(37) Peoples' Transportation Services, Ltd.
(38) Pickett Pickett & Pickett
(39) Bill Pilgrim Enterprises, Inc.
(40) The Pinkerton & Laws Co.
(41) Reeves, Avary Associates
(42) William L. Reno and Associates
(43) Riverside Development
(44) Robert J. Shircliff and Associates
(45) Southern Energy
(46) Standard Southeast, Inc.
(47) Stricklands Pharmacy
(48) Stubbs Shipping Company
(49) Vaughn Lumber Company
(50) Ed Voyles Chrysler-Plymouth

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(51) Bill Walker and Associates
(52) Weatherly & Associates, Inc.
(53) General Roofing Co. D/B/A
(54) Willis and Veenstra Investment Co.
(55) Wright Farms

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

2. Failed in a vote of 3-2 to pass a motion to approve the letter and Factual and Legal Analysis to Friends of Mattingly and Donald P. Gammon, as treasurer, as recommended in the General Counsel's report dated May 14, 1990.

Commissioners McDonald, McGarry, and Thomas voted affirmatively for the motion; Commissioners Elliott and Josefiak dissented; Commissioner Aikens was not present at the time of the vote.

3. Decided by a vote of 5-0 to approve the letter and Factual and Legal Analysis to Friends of Mattingly and Donald P. Gammon, as treasurer, as recommended in the General Counsel's report dated May 14, 1990

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

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4. Decided by a vote of 5-0 to approve the letters and Factual and Legal Analyses to 72 individuals, 55 corporations, and 17 political committees based on the sample letters and Factual and Legal Analyses attached to the General Counsel's report dated May 14, 1990.

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

Attest:

6-20-90
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 25, 1990

Mr. Donald P. Gammon, Treasurer
c/o Ben Cotten, Esquire
Cotten, Day & Selfon
Twelfth Floor
1899 L St., N.W.
Washington, D.C. 20036

RE: MUR 2989
Friends of Mattingly and
Donald P. Gammon, as
treasurer

Dear Mr. Gammon:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Friends of Mattingly ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 441a(f), 441b(a), 434(b), 432, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") and 11 C.F.R. § 110.6(c)(3), a provision of the Commission's Regulations. 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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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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 Elizabeth Campbell, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Friends of Mattingly and Donald P. Gammon, as treasurer

MUR 2989

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2). Pursuant to 2 U.S.C. § 438(b), the Commission conducted an examination and audit of the Friends of Mattingly Committee ("the Committee"). The examination and audit covered the period from January 1, 1985 through December 31, 1986.

A. Excessive Contributions

The Act states that no person shall make contributions to a candidate and his authorized political committees with respect to any election for federal office, which in the aggregate, exceeds $1,000.00. 2 U.S.C. § 441a(a)(1)(A). The Act further provides that no multicandidate political committee may make contributions to a federal candidate and his authorized political committees with respect to any election for federal office, which aggregate in excess of $5,000.00. 2 U.S.C. § 441a(a)(2)(A). A multicandidate committee is defined by the Act as a political committee which has been registered for at least six months, has received contributions for federal elections from more than 50 persons and has made contributions to at least five federal

candidates. 2 U.S.C. § 441a(a). Other political committees which are not multicandidate committees may contribute only $1,000.00 per candidate per election. See 11 C.F.R. § 110.1. No candidate or authorized campaign committee shall knowingly accept any contribution in violation of the provisions of the Act. 2 U.S.C. § 441a(f).

The Commission regulations[1] define "with respect to any election" to mean that a contribution designated for a particular election will count as a contribution towards the election designated by the contributor. 11 C.F.R. § 110.1(a)(2)(i). Contributions may be designated to a primary election after the date of the primary only to the extent that the contribution does not exceed the "net debts outstanding"[2] from the primary

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1. Note that the regulations governing this case are those in effect at the time of the Federal Election Commission's audit. Therefore, citations from Parts 104 and 110 of Title 11 of the Code of Federal Regulations refer to Regulations in effect prior to the April 8, 1987 amendments to those sections.

2. In order to determine whether a Committee has any "net debts outstanding" from a particular election, the Committee must figure out the difference between the total of the Committee's unpaid debts and obligations incurred with respect to the election, and the total of the Committee's cash on hand and receivables available to pay those debts and obligations. 11 C.F.R. § 110.1(b)(3)(ii); See also, Advisory Opinion 1984-32, 1 Fed. Election Camp. Fin. Guide [CCH] ¶ 5777.

11 C.F.R. § 110.1(b)(3)(ii) further provides that "net debts outstanding" shall also include the estimated cost of raising funds to liquidate the debts remaining from the election or if the candidate will not be a candidate for the next election, estimated costs associated with termination of political activity. However, 11 C.F.R. § 110.1(b)(3)(ii) is not applicable here because it was a 1987 regulation and thus was not in effect at the time of this audit. Moreover, even if the regulation was in effect at the time of the audit, fundraising costs would not be included because the Committee had a surplus after the primary election, and termination costs would not be considered because Mattingly was a candidate in the general election.

election. Id. An undesignated contribution will go towards the primary if it is made on or before the date of the primary, or towards the general election if it is made after the date of the primary. 11 C.F.R. § 110.1(a)(2)(ii). A contribution which represents contributions by more than one person shall indicate on the contribution instrument or on an accompanying written instrument signed by all contributors, the amount to be attributed to each contributor. 11 C.F.R. § 104.8(d).

The results of the Commission's Audit showed that the Committee finished the primary election with a surplus of $193,202.10. Accordingly, under 11 C.F.R. § 110.1(a)(2)(i), the Committee could not legally accept contributions designated for the primary after August 12, 1986, the date of the primary.[3]

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3. The Commission rejected the Committee's assertion that the auditors failed to include $405,368.22 in post-primary disbursements as primary expenses because a review of the Committee's disclosure reports indicate that if that were true, almost all disbursements made thirty days after the primary were primary disbursements. This assertion is unlikely given that the Committee did not report any primary debts, the candidate was not seriously challenged in the primary in which he received 95% of the votes, and the primary was held in August, less than three months before a close general election.

The Commission also rejected the Committee's claim that contract obligations assumed prior to the primary were all primary related. Pursuant to 11 C.F.R. § 100.8(a)(2), a written contract, including a media contract, promise, or agreement to make an expenditure is an expenditure as of the date such contract, promise or obligation is made. The Committee said that part of its campaign strategy called for the husbanding of committee funds to discourage potential opponents. To accomplish this, it contracted with media and campaign consultants in 1985 but the contract payments were delayed until after the primary. However, the Committee has submitted no supporting documentation to demonstrate that all or part of these obligations were incurred before the primary, and it did not report any contractual obligations as debts in the reports filed prior to the primary. Moreover, the date that an obligation is incurred does not automatically determine to which election the

The Commission's examination and audit determined that the Committee accepted 704 apparent excessive contributions from 502 individuals totaling $344,840.00.[4] The audit also showed that it appears the Committee accepted excessive contributions from 17 committees, totaling $31,833.05.[5]

Therefore, for accepting excessive contributions from 502 individuals and 17 political committees, there is reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. § 441a(f).

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(Footnote 3 continued from previous page)
expenditure is attributable.

4. Of the total amount, $2,250.00 was refunded but the refunds were not timely. The remaining $342,590.00 has not been refunded.

5. The total amount of excessive contributions from committees has been adjusted since the interim audit report. The contribution of $5,723.22 from Floridians for President Reagan's Majority ("Floridians") is not included as an excessive because it is not an unregistered committee; however, it has since been learned that Floridians is registered with the Commission as a joint fundraiser for Senators Mattingly and Paula Hawkins. Under the terms of the joint fundraising agreement, the Mattingly Committee should have only received half of the fundraising proceeds. However, after deducting expenses, the remaining fundraising proceeds were $6,723.22, all of which went to Mattingly. Thus, the Mattingly Committee received $3,363.71 more than it was entitled to and the Hawkins Committee received $3,363.71 less. By allowing all these fundraising proceeds to be distributed to the Mattingly Committee, the Hawkins Committee gave a contribution to the Mattingly Committee of $3,363.71, which was excessive by $2,363.71, since the Hawkins Committee was not a multicandidate committee and could only contribute $1,000.00 to the Mattingly Committee.

Accordingly, the amount of excessive contributions from committees has been revised to eliminate the $5,723.22 excessive amount from Floridians and include a $2,363.71 excessive amount from the Hawkins Committee, leaving the total excessive amount at $31,833.05.

B. Corporate Contributions

All corporations are prohibited under 2 U.S.C. § 441b from making a contribution or expenditure in connection with any federal election to political office. No candidate or political committee shall knowingly accept or receive any corporate contribution. 2 U.S.C. § 441b(a). Based on the examination and audit of the Committee, it appears that the Committee received 187 prohibited corporate contributions from 152 corporate entities[6], totaling $30,610.59. Therefore, this Office recommends that the Commission find reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. § 441b(a).[7]

C. Failure to Report Earmarked Contributions

Pursuant to 2 U.S.C. § 441a(a)(8), contributions which are earmarked for a particular candidate or otherwise directed through an intermediary or conduit to such candidate, shall be treated as contributions from such person to such candidate. The recipient of earmarked contributions must identify both the conduit and the original source of the contribution. 11 C.F.R. § 110.6(c)(3).

The Committee received a total of $351,991.61 in earmarked contributions from the NRSC's Direct-To Program. The Committee

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6. The Commission's auditors verified the corporate status of the 152 corporate entities by confirming their corporate status with the secretary of state where the corporation is located.

7. Three of these contributions were refunded, and part of a fourth, but the refunds were not timely.

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failed to disclose $253,975.57 of that amount as earmarked through the NRSC.

In addition, the Committee participated in a joint fundraising event in 1985 and again in 1986, sponsored by the Senator John Warner Golf Tournament Committee ("GTC"). The Committee received 28 earmarked contributions conduited from GTC in 1985 totaling $15,283.44, and 29 earmarked contributions in 1986, totaling $19,608.34, but failed to disclose them as earmarked contributions.

Finally, the Committee received an additional 80 earmarked contributions from 28 political committees, totaling $22,285.97, for which the conduit was not reported.

Therefore, there is reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 11 C.F.R. § 110.6(c)(3).

D. Reporting Violations

Pursuant to 2 U.S.C. § 434(b)(3)(B), reports filed by a political committee must disclose the identification of each political committee which made a contribution to the reporting committee during the reporting period together with the date of receipt and amount of such contribution. In addition, the Commission's regulations require the itemization of receipts from all committees (including political committees and committees which do not qualify as political committees under the Act) which make contributions to the reporting committees during the reporting period, together with the date of receipt and amount of

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such contribution. 11 C.F.R. § 104.3(a)(4)(ii).

The Committee did not properly report 87 contributions from committees, totaling $75,230.39. Nine of these contributions were incorrectly reported as coming from individuals, rather than from committees; twelve contributions disclosed an incorrect amount, resulting in a net underreporting of $7,275.00; and sixty-six contributions, totaling $49,020.33, were not reported at all.

Reports filed by a committee must disclose the cash on hand at the beginning of the reporting period and the total amount of receipts and disbursements for the reporting period and calendar year. 2 U.S.C. §§ 434(b)(1), 434(b)(2) and 434(b)(4). The Committee's 1985 and 1986 reports contained several misstatements of financial activity. First, the Committee's 1985 cash on hand was overstated by $8,624.27. See 2 U.S.C. § 434(b)(1). Overall, in 1985, the Committee's receipts were overstated by $11,662.20 disbursements were understated by $1,095.47. See 2 U.S.C. §§ 434(b)(2) and 434(b)(4). In addition, in the Committee's 1986 reports, receipts were overstated by $37,756.17 and disbursements were overstated by $42,006.80. Id.

A political committee must report the amount and nature of all outstanding debts and obligations owed by such committee. 2 U.S.C. § 434(b)(8). Outstanding debts and obligations must be continuously reported until extinguished. 11 C.F.R. § 104.11(a). If the debt or obligation exceeds $500, it must be reported as of the time of the transaction. 11 C.F.R. § 104.11(b). If the debt or obligation does not exceed $500, it must be reported as of the

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time payment is made or no later than 60 days after the obligation is incurred, whichever comes first. Id.

During the examination and audit, the auditors were informed by a Committee representative that the Committee had between 53 and 127 reportable debts in 1986. However, the Committee reported only one debt and it was not reported until the Committee filed its 1986 Post General Election report. The Committee representative said that debts were not reported because the Committee did not maintain an accounts payable ledger.

Therefore, there is reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. § 434(b).

E. Failure to Maintain Accurate Record of Receipts

Pursuant to 11 C.F.R. § 102.9(a), the treasurer of a political committee shall use a reasonable accounting procedure to maintain an account of all contributions received by or on behalf of a political committee. See 2 U.S.C. § 432(c). For contributions that exceed $50, the account must include the name and address of the contributor and the amount and date of receipt of the contribution. 11 C.F.R. § 102.9(a)(1). If contributions from a contributor exceed $200 in the aggregate, then the account must include the name and address of the contributor, the contributor's employer and occupation, and the date of receipt and amount of each contribution. 11 C.F.R. § 102.9(a)(2). If the contribution is from a political committee, regardless of the

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amount, the account must include the name and address of the political committee and the date of receipt and amount of each contribution. 11 C.F.R. § 102.9(a)(3). See also 2 U.S.C. §§ 434(c)(1)-(4). A treasurer is required to keep these records for three years after the report is filed. 2 U.S.C. § 432(d).

The Committee did not maintain a complete record of receipts for the 1985 Mid Year and 1986 Post-General Election reporting period. The Commission's auditors determined that the Committee did not have records for $22,143.05 in receipts reported on the 1985 Mid Year report, and also did not have records for $132,637.59 in receipts reported on the Post-General election report. Therefore, there is reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. § 432.

Attachments:
1. Apparent excessive contributions from individuals
2. Apparent excessive contributions from political committees
3. Apparent corporate contributions
4. Contributions earmarked through political and other committees for which conduits were not disclosed
5. Contributions from political and other committees apparently not reported
6. Contributions from other committees reported in the name of an individual
7. Contributions from other committees reported at an incorrect amount

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Jack Smith, Treasurer
A.L. Williams & Associates PAC
3100 Breckinridge Blvd.
Building 1200
Duluth, GA 30136

RE: MUR 2989
A.L. Williams & Associates
PAC and Jack Smith as
treasurer

Dear Mr. Smith:

On June 19, 1990, the Federal Election Commission found that there is reason to believe A.L. Williams & Associates PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: A.L. Williams & Associates PAC and Jack Smith, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that A.L. Williams & Associates PAC made excessive contributions totaling $5,000 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that A.L. Williams & Associates PAC and Jack Smith, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Thomas L. Thomas, Treasurer
American Financial Services Association PAC
1101 14th St., NW
#400
Washington, DC 20005

RE: MUR 2989
American Financial Services Association PAC and Thomas L. Thomas as treasurer

Dear Mr. Thomas:

On June 19, 1990, the Federal Election Commission found that there is reason to believe American Financial Services Association PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: American Financial Services Ass'n PAC and Thomas L. Thomas, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that American Financial Services Ass'n PAC made excessive contributions totaling $500 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that American Financial Services Ass'n PAC and Thomas L. Thomas, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

John R. Gentille, Treasurer
Associated General Contractors PAC
1957 E St., NW
Washington, DC 20006

RE: MUR 2989
Associated General
Contractors PAC and John R.
Gentille as treasurer

Dear Mr. Gentille:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Associated General Contractors PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Associated General Contractors PAC and John R. Gentille, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Associated General Contractors PAC made excessive contributions totaling $500 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Associated General Contractors PAC and John R. Gentille, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Nancy C. O'Connor, Treasurer
Bankers Trust New York Corp. PAC
280 Park Avenue
New York, NY 10017

RE: MUR 2989
Bankers Trust New York Corp. PAC and Nancy C. O'Connor as treasurer

Dear Ms. O'Connor:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Bankers Trust New York Corp. PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Bankers Trust New York Corp.
PAC and Nancy C. O'Connor,
as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Bankers Trust New York Corp. PAC made excessive contributions totaling $2,000 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Bankers Trust New York Corp. PAC and Nancy C. O'Connor, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

James D. Dixon, Treasurer
Citizens & Southern GA Corp. Better Gov't Cttee
35 Broad St.
Atlanta, GA 30303

RE: MUR 2989
Citizens & Southern GA Corp.
Better Gov't Cttee and James
D. Dixon as treasurer

Dear Mr. Dixon:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Citizens & Southern GA Corp. Better Gov't Cttee and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Citzns & Sthrn GA Corp
Better Gov't Cmte and James
D. Dixon, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Citzns & Sthrn GA Corp Better Gov't Cmte made excessive contributions totaling $3,000 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Citzns & Sthrn GA Corp Better Gov't Cmte and James D. Dixon, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Genean McKinnon, Treasurer
Committee to Re-Elect
U.S. Senator Paula Hawkins
701 Via Bella
P.O. Box 193
Winter Park, FL 32789

RE: MUR 2989
Committee To Re-Elect U.S. Senator Paula Hawkins and Genean McKinnon, as treasurer

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Dear Ms. McKinnon:

On June 19, 1990, the Federal Election Commission found that there is reason to believe the Committee to Re-Elect U.S. Senator Paula Hawkins and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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.

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Cmte to Re-Elect Sen. Paula Hawkins and Genean McKinnon, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Cmte to Re-Elect Sen. Paula Hawkins made excessive contributions totaling $2,363.71 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Cmte to Re-Elect Sen. Paula Hawkins and Genean McKinnon, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Earl Quigg, Treasurer
Flowers Industries Inc. PAC
P.O. Box 1338
Thomasville, GA 31799

RE: MUR 2989
Flowers Industries Inc. PAC
and Earl Quigg as treasurer

Dear Mr. Quigg:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Flowers Industries Inc. PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Flowers Industries Inc. PAC
and Earl Quigg, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Flowers Industries Inc. PAC made excessive contributions totaling $2,500 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Flowers Industries Inc. PAC and Earl Quigg, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Paul G. Brower, Treasurer
Gold Kist Political Action for Farmers, Inc.
P.O. Box 2210
Atlanta, GA 30301

RE: MUR 2989
Gold Kist Political Action
for Farmers, Inc. and Paul
G. Brower as treasurer

Dear Mr. Brower:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Gold Kist Political Action for Farmers, Inc. and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Gold Kist Pol. Action for Farmers, Inc. and Paul G. Brower, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Gold Kist Pol. Action for Farmers, Inc. made excessive contributions totaling $1,000 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Gold Kist Pol. Action for Farmers, Inc. and Paul G. Brower, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Stephen E. Chaudet, Treasurer
Lockheed Employees' PAC
4500 Park Granada Blvd.
Building 9
Calabasas, CA 91399

RE: MUR 2989
Lockheed Employees' PAC
and Stephen E. Chaudet, as
treasurer

Dear Mr. Chaudet:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Lockheed Employees' PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Lockheed Employees' PAC and
Stephen E. Chaudet, as
treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Lockheed Employees' PAC made excessive contributions totaling $1,500 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Lockheed Employees' PAC and Stephen E. Chaudet, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Cory N. Strupp, Treasurer
Morgan Companies
60 Wall Street
New York, NY 10260

RE: MUR 2989
Morgan Companies PAC and
Cory N. Strupp as treasurer

Dear Mr. Strupp:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Morgan Companies PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Morgan Companies PAC and
Cory N. Strupp, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Morgan Companies PAC made excessive contributions totaling $500 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Morgan Companies PAC and Cory N. Strupp, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Bruce C. Hendrickson, Treasurer
National Association of Life Underwriters PAC
1922 F St., NW
Washington, DC 20006

RE: MUR 2989
National Association of Life Underwriters PAC and Bruce C. Hendrickson as treasurer

Dear Mr. Hendrickson:

On June 19, 1990, the Federal Election Commission found that there is reason to believe National Association of Life Underwriters PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Nat'l Ass'n of Life Underwriters PAC and Bruce C. Hendrickson, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Nat'l Ass'n of Life Underwriters PAC made excessive contributions totaling $3,850 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Nat'l Ass'n of Life Underwriters PAC and Bruce C. Hendrickson, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Philip C. Danford, Treasurer
PAC of Dun & Bradstreet Corp.
600 Maryland Ave.
Suite 240
Washinton, DC 20024

RE: MUR 2989
PAC of Dun & Bradstreet
Corp. and Philip C. Danford
as treasurer

Dear Mr. Danford:

On June 19, 1990, the Federal Election Commission found that there is reason to believe PAC of Dun & Bradstreet Corp. and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: PAC of Dun & Bradstreet Corp. and Philip C. Danford, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that PAC of Dun & Bradstreet Corp. made excessive contributions totaling $1,119.34 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that PAC of Dun & Bradstreet Corp. and Philip C. Danford, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Milan E. Johnson, Treasurer
Prudential Insurance Co. of America Federal PAC
745 Broad St.
Prudential Plaza, 3rd floor
Newark, NJ 07068

RE: MUR 2989
Prudential Insurance Co. of America Federal PAC and Milan E. Johnson as treasurer

Dear Mr. Johnson:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Prudential Insurance Co. of America Federal PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Prudential Ins. Co. of America Fed PAC and Milan E. Johnson, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Prudential Ins. Co. of America Fed PAC made excessive contributions totaling $1,500 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Prudential Ins. Co. of America Fed PAC and Milan E. Johnson, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Roman Rice, Treasurer
Public Service Political Action Committee
1761 Business Center Dr.
Suite 230
Reston, VA 22090

RE: MUR 2989
Public Service Political Action Committee and Roman Rice as treasurer

Dear Mr. Rice:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Public Service Political Action Committee and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Public Service PAC and
Roman Rice, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Public Service PAC made excessive contributions totaling $500 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Public Service PAC and Roman Rice, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Gary E. Atwell, Treasurer
Textron Inc. PAC
40 Westminster St.
Providence, RI 02903

RE: MUR 2989
Textron Inc. PAC and Gary E. Atwell as treasurer

Dear Mr. Atwell:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Textron Inc. PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Textron Inc. PAC and Gary E. Atwell, as treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Textron Inc. PAC made excessive contributions totaling $3,500 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Textron Inc. PAC and Gary E. Atwell, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1990

Donald E. Groce, Treasurer
United Technologies Corp. PAC
1825 Eye St., N.W.
Suite 700
Washinton, DC 20006

RE: MUR 2989
United Technologies Corp. PAC and Donald E. Groce as treasurer

Dear Mr. Groce

On June 19, 1990, the Federal Election Commission found that there is reason to believe United Technologies Corp. PAC and you, as treasurer, violated 2 U.S.C. § 441a(a), 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 the Committee and you, as treasurer. 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 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 the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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

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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.

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: United Technologies Corp.
PAC and Donald E. Groce, as
treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that United Technologies Corp. PAC made excessive contributions totaling $500 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that United Technologies Corp. PAC and Donald E. Groce, as treasurer, violated 2 U.S.C. § 441a(a)(2)(A).

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LAW OFFICES

COTTEN, DAY & SELFON

TWELFTH FLOOR

1899 L STREET, NORTHWEST

WASHINGTON, D. C. 20036

(202) 659-9505

TELECOPIER NO.: (202) 775-8359

JAMES M. DAY
BEN COTTEN*
BRUCE I. SELFON*
PATRICIA R. COLLINS*
DANIEL S. SCHUMACK*
EDWARD V. GREGOROWICZ, JR.
GEORGE R. SCHLOSSBERG**

*ALSO ADMITTED IN MARYLAND
*ALSO ADMITTED IN MARYLAND, VIRGINIA AND NEW YORK
**ALSO ADMITTED IN NEW YORK

MUR 2989

RECEIVED
FEDERAL ELECTION COMMISSION
90 JUL 10 PM 4:00
OFFICE OF GENERAL COUNSEL

July 10, 1990

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

Attn: Elizabeth Campbell

Re: Your letter of June 25, 1990 (Attached)

Dear Ms. Campbell:

Your correspondence sent under date of June 25, 1990, arrived in my office while I was out of the country and, as coincidence would have it, so was Mr. Gammon. We have had insufficient time to evaluate the allegations, or to decide upon a course of action. Accordingly, we request an extension of time in which to respond, up to and including August 31, 1990.

While we understand the limits placed on extensions beyond 20 days, I would politely refer you to the file for the length of time taken by the Commission in advising us of its position subsequent to our communications of last year. A further factor that would be appropriate to consider is Mr. Gammon's continued absence from the country, and the lack of any campaign staff or personnel staff of Mack Mattingly to review the specifics of your allegations.

Thank you in advance for your courtesy and cooperation.

Very truly yours,

Ben Cotten

BC/gr
Encl.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 11, 1990

Colleen C. McAndrews
Northrop Employees Political Action Committee
1441 Fourth Street
Santa Monica, CA 90401

RE: MUR 2989
Northrop Employees Politica
Action Committee and its
treasurer

Dear Ms. McAndrews:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Northrop Employees Political Action Committee ("the Committee") and its treasurer violated 2 U.S.C. § 441a(a), 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 the Committee and its treasurer. 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 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 the Committee and its treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Northrop Employees PAC and its treasurer

The Federal Election Campaign Act of 1971, as amended, prohibits a multicandidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. 2 U.S.C. § 441a(a)(2)(A).

A review of the reports filed by the Friends of Mattingly reveals that Northrop Employees PAC made excessive contributions totaling $2,000 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. Therefore, there is reason to believe that Northrop Employees PAC and its treasurer violated 2 U.S.C. § 441a(a)(2)(A).

9304351456 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

C. L. Patrick
2701 Lynda Lane
Columbus, GA 31906

RE: MUR 2989
C. L. Patrick

Dear Mr. Patrick:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: C. L. Patrick

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that C. L. Patrick made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $3,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 6/9/83 $1,000 - 5/23/85 $1,000 - 6/3/85	$3,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $3,000. Therefore, there is reason to believe that C. L. Patrick violated 2 U.S.C. § 441a(a)(1)(A).

9304351456 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Richard K. Whitehead, Jr.
1216 Zonolite Rd.
Atlanta, GA 30306

RE: MUR 2989
Richard K. Whitehead, Jr.

Dear Mr. Whitehead:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Richard K. Whitehead, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Richard K. Whitehead, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$2,500 - 5/29/85	$1,500

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Richard K. Whitehead, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351-4568

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Emily Woodruff
1941 Stark Ave.
Columbus, GA 31906

RE: MUR 2989
Emily Woodruff

Dear Ms. Woodruff:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Emily Woodruff

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Emily Woodruff made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,050 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$50 - 1/29/86 $1,000 - 10/24/86	$1,050

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,050. Therefore, there is reason to believe that Emily Woodruff violated 2 U.S.C. § 441a(a)(1)(A).

9304351457 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

John Treacy Beyer
353 Argonne Dr., NW
Atlanta, GA 30305

RE: MUR 2989
John Treacy Beyer

Dear Mr. Beyer:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: John Treacy Beyer

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that John Treacy Beyer made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,000 - 10/1/86 $500 - 10/1/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that John Treacy Beyer violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

A. T. Kennedy
364 Valley Rd., NW
Atlanta, GA 30305

RE: MUR 2989
A. T. Kennedy

Dear Mr. Kennedy:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: A. T. Kennedy

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that A. T. Kennedy made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$500 - 10/31/83 $1,000 - 5/17/85 $500 - 10/31/85	$2,000

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that A. T. Kennedy violated 2 U.S.C. § 441a(a)(1)(A).

9304351457

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Andrew Gay Labrot
P.O. Box 1666
Savannah, GA 31402

RE: MUR 2989
Andrew Gay Labrot

Dear Mr. Labrot:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Andrew Gay Labrot

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Andrew Gay Labrot made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate Primary and General elections in Georgia. Information on these contributions is presented below:

Primary and General Dates	Total Contributed for the elections	Total Excessives in the elections
8/12/86	$2,000 - 5/15/85 $200 - 4/22/86	$2,000
11/4/86	$1,200 - 9/12/86 $100 - 10/28/86	

Because these contributions were for the general and primary elections, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Andrew Gay Labrot violated 2 U.S.C. § 441a(a)(1)(A).

9304351458O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

John M. Stuckey, Jr.
1005 Virginia Ave., Ste 200
Atlanta, GA 30354

RE: MUR 2989
John M. Stuckey, Jr.

Dear Mr. Stuckey:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: John M. Stuckey, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that John M. Stuckey, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$500 - 11/26/84 $1,000 - 5/20/85	$1,500

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that John M. Stuckey, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351458 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Cynthia Thawley
7115 Raich Dr.
San Jose, CA 95120

RE: MUR 2989
Cynthia Thawley

Dear Ms. Thawley:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Cynthia Thawley

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Cynthia Thawley made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,900 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$3,750 - 9/17/86 $150 - 9/17/86	$2,900

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $2,900. Therefore, there is reason to believe that Cynthia Thawley violated 2 U.S.C. § 441a(a)(1)(A).

9304351458 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

William E. Timmons
9501 Newbold Pl.
Bethesda, MD 20817

RE: MUR 2989
William E. Timmons

Dear Mr. Timmons:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: William E. Timmons

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that William E. Timmons made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,750 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 2/11/85 $1,000 - 2/21/85	$1,750

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,750. Therefore, there is reason to believe that William E. Timmons violated 2 U.S.C. § 441a(a)(1)(A).

9304351458 9

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Lloyd J. Tomer
10801 Pear Tree Lane, Ste 100
St. Ann, MO 63074

RE: MUR 2989
Lloyd J. Tomer

Dear Mr. Tomer:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Lloyd J. Tomer

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Lloyd J. Tomer made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/16/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Lloyd J. Tomer violated 2 U.S.C. § 441a(a)(1)(A).

9304351459 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Maurice J. Towery
4261 Woodland Brook Dr., NW
Atlanta, GA 30339

RE: MUR 2989
Maurice J. Towery

Dear Mr. Towery:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Maurice J. Towery

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Maurice J. Towery made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 11/1/83 $1,000 - 5/29/85	$2,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Maurice J. Towery violated 2 U.S.C. § 441a(a)(1)(A).

9304351459 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Robert Lee Turley
Summit House 1805
280 S. Collier Blvd.
Marco Island, FL 33937

RE: MUR 2989
Robert Lee Turley

Dear Mr. Turley:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Robert Lee Turley

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Robert Lee Turley made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/16/86	$1,500

Because these contributions were for the primary election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Robert Lee Turley violated 2 U.S.C. § 441a(a)(1)(A).

9304351459 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Michael R. Utz
P.O. Box 3405
Longwood, FL 32779

RE: MUR 2989
Michael R. Utz

Dear Mr. Utz:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Michael R. Utz

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Michael R. Utz made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/17/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Michael R. Utz violated 2 U.S.C. § 441a(a)(1)(A).

9304351460 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Lafayette Walker
10012 Sorrel Ave.
Potomac, MD 20854

RE: MUR 2989
Lafayette Walker

Dear Mr. Walker:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Lafayette Walker

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Lafayette Walker made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,000 - 11/1/86 $500 -	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Lafayette Walker violated 2 U.S.C. § 441a(a)(1)(A).

9304351460 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Randall Walker
611 Salem Church Rd.
Carrolton, GA 30117

RE: MUR 2989
Randall Walker

Dear Mr. Walker:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Randall Walker

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Randall Walker made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,650 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/19/86 $150 - 10/1/86	$1,650

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,650. Therefore, there is reason to believe that Randall Walker violated 2 U.S.C. § 441a(a)(1)(A).

2304351460 7

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Richard A. Walker
Building 3, Suite 3
8313 W. Hillsborough Ave.
Tampa, FL 33615

RE: MUR 2989
Richard A. Walker

Dear Mr. Walker:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Richard A. Walker

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Richard A. Walker made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/18/86	$1,500

Because these contributions were for the general election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Richard A. Walker violated 2 U.S.C. § 441a(a)(1)(A).

9304351461 0

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Claude Williams, Jr.
9940 Timothy Rd.
Athens, GA 30606

RE: MUR 2989
Claude Williams, Jr.

Dear Mr. Williams:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Claude Williams, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Claude Williams, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,100 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 10/28/83 $1,000 - 5/20/85	$1,100

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,100. Therefore, there is reason to believe that Claude Williams, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351461 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Emory Winship
P.O. Box 1566
Fernandina Beach, FL 32034

RE: MUR 2989
Emory Winship

Dear Mr. Winship:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Emory Winship

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Emory Winship made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 5/10/83 $500 - 2/13/85 $1,000 - 11/19/85	$2,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Emory Winship violated 2 U.S.C. § 441a(a)(1)(A).

9304351461 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Harlen Zeitler
Route 3, Box 321A
Pound, WI 54161

RE: MUR 2989
Harlen Zeitler

Dear Mr. Zeitler:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Harlen Zeitler

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Harlen Zeitler made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,000 - 10/1/86 $500 - 10/1/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Harlen Zeitler violated 2 U.S.C. § 441a(a)(1)(A).

9304351461 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

J. Barnett Woodruff
1909 Carter Ave.
Columbus, GA 31901

RE: MUR 2989
J. Barnett Woodruff

Dear Mr. Woodruff:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: J. Barnett Woodruff

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that J. Barnett Woodruff made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $4,250 for the 1986 Republican U.S. Senate Primary and General elections in Georgia. Information on these contributions is presented below:

Primary and General Dates	Total Contributed for the elections	Total Excessives in the elections
8/12/86	$1,000 - 4/2/85 $2,000 - 5/29/85	$4,250
11/4/86	$2,000 - 10/24/86	

Because these contributions were in excess of $1,000 for each of the Primary and General elections, they exceed the contribution limitations of the Act by $4,250. Therefore, there is reason to believe that J. Barnett Woodruff violated 2 U.S.C. § 441a(a)(1)(A).

9304351462 2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Jane A. Miller
1350 Dogwood Rd.
Snellville, GA 30278

RE: MUR 2989
Jane A. Miller

Dear Ms. Miller:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Jane A. Miller

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Jane A. Miller made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$500 - 10/1/86 $2,000 - 10/1/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Jane A. Miller violated 2 U.S.C. § 441a(a)(1)(A).

9304351462 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Todd McMahon
3501 207th Ave., SE
Issaquah, WA 98027

RE: MUR 2989
Todd McMahon

Dear Mr. McMahon:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Todd McMahon

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Todd McMahon made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/15/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Todd McMahon violated 2 U.S.C. § 441a(a)(1)(A).

9304351462 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

George A. Martonik
5016 178th Ave., E.
Sumner, WA 98390

RE: MUR 2989
George A. Martonik

Dear Mr. Martonik:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: George A. Martonik

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that George A. Martonik made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/15/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that George A. Martonik violated 2 U.S.C. § 441a(a)(1)(A).

2304351463 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

George E. Luce
512 Westview Dr.
Fort Valley, GA 31030

RE: MUR 2989
George E. Luce

Dear Mr. Luce:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: George E. Luce

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that George E. Luce made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,300 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$200 - 11/1/83 $1,000 - 5/23/85 $100 - 5/29/86	$1,300

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,300. Therefore, there is reason to believe that George E. Luce violated 2 U.S.C. § 441a(a)(1)(A).

9304351463 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Albert L. Luce, Jr.
510 Westview Dr.
Fort Valley, GA 31030

RE: MUR 2989
Albert L. Luce, Jr.

Dear Mr. Luce:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Albert L. Luce, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Albert L. Luce, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,300 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 11/1/83 $1,000 - 5/22/85	$1,300

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,300. Therefore, there is reason to believe that Albert L. Luce, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351463 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Frank Love, Jr.
1100 C&S Bank Building
Atlanta, GA 30335

RE: MUR 2989
Frank Love, Jr.

Dear Mr. Love:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Frank Love, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Frank Love, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,250 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$250 - 11/2/83 $1,000 - 5/28/85	$1,250

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,250. Therefore, there is reason to believe that Frank Love, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351446 40

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Charles A. Lotz, Jr.
725 Tanglewood Trail
Atlanta, GA 30327

RE: MUR 2989
Charles A. Lotz, Jr.

Dear Mr. Lotz:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Charles A. Lotz, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Charles A. Lotz, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$2,500 - 6/3/85	$1,500

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Charles A. Lotz, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351464 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Ronald S. Leventhal
7965 Innsbruck Dr.
Atlanta, GA 30328

RE: MUR 2989
Ronald S. Leventhal

Dear Mr. Leventhal:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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.

9304351464 4

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Ronald S. Leventhal

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Ronald S. Leventhal made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $3,750 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 5/15/85 $1,250 - 5/27/85 $1,000 - 5/21/86 $1,000 - 7/1/86	$3,750

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $3,750. Therefore, there is reason to believe that Ronald S. Leventhal violated 2 U.S.C. § 441a(a)(1)(A).

9304351464 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

C.M. Leger
Route 4, Box 401
Cordele, GA 31015

RE: MUR 2989
C.M. Leger

Dear Mr. Leger:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: C.M. Leger

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that C.M. Leger made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 5/23/83 $1,000 - 5/28/85	$2,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $2,000 . Therefore, there is reason to believe that C.M. Leger violated 2 U.S.C. § 441a(a)(1)(A).

9304351464 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Willard Lasseter
P.O. Box 726
Moultrie, GA 31768

RE: MUR 2989
Willard Lasseter

Dear Mr. Lasseter:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Willard Lasseter

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Willard Lasseter made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 5/24/85 $1,000 - 1/14/86 $150 - 4/23/86 $150 - 6/17/86	$2,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Willard Lasseter violated 2 U.S.C. § 441a(a)(1)(A).

9304351465 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

John B. Keeble
250 Piedmont Ave., Ste 1900
Atlanta, GA 30365

RE: MUR 2989
John B. Keeble

Dear Mr. Keeble:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: John B. Keeble

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that John B. Keeble made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$2,000 - 7/10/86	$2,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that John B. Keeble violated 2 U.S.C. § 441a(a)(1)(A).

9304351465

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Eugene Kelly
Route 1/Liberty Church Rd., Box 117
Monticello, GA 31064

RE: MUR 2989
Eugene Kelly

Dear Mr. Kelly:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Eugene Kelly

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Eugene Kelly made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $3,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,500 - 5/21/85 $2,000 - 6/24/86 $500 - 6/24/86	$3,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $3,000. Therefore, there is reason to believe that Eugene Kelly violated 2 U.S.C. § 441a(a)(1)(A).

9304351465 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Claire A. King
5505 Errol Pl.
Atlanta, GA 30327

RE: MUR 2989
Claire A. King

Dear Ms. King:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Claire A. King

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Claire A. King made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,250 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,000 - 9/30/86 $500 - 9/30/86 $750 - 11/01/86	$2,250

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $2,250. Therefore, there is reason to believe that Claire A. King violated 2 U.S.C. § 441a(a)(1)(A).

9304351461

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

P.S. Knox, Jr.
Route 3, Box 129
Thomson, GA 30824

RE: MUR 2989
P.S. Knox, Jr.

Dear Mr. Knox:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: P.S. Knox, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that P.S. Knox, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$3,000 - 5/28/85	$2,000

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that P.S. Knox, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351464

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Rankin Smith
707 Life of Georgia Bldg
Atlanta, GA 30308

RE: MUR 2989
Rankin Smith

Dear Mr. Smith:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Rankin Smith

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Rankin Smith made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,200 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$200 - 6/20/85 $1,000 - 7/18/85	$1,200

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $1,200. Therefore, there is reason to believe that Rankin Smith violated 2 U.S.C. § 441a(a)(1)(A).

2304351467

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

W. L. Shirley
121 Grogan St.
Lavonia, GA 30553

RE: MUR 2989
W. L. Shirley

Dear Mr. Shirley:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: W. L. Shirley

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that W. L. Shirley made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,050 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$2,000 - 6/4/85	$1,050

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,050. Therefore, there is reason to believe that W. L. Shirley violated 2 U.S.C. § 441a(a)(1)(A).

9304351467O

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Dennis Schecter
999 Route 53
Morris Plains, NJ 07950

RE: MUR 2989
Dennis Schecter

Dear Mr. Schecter:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Dennis Schecter

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Dennis Schecter made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/16/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Dennis Schecter violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Gary W. Rollins
c/o R.F.I. Company
P.O. Box 647
Atlanta, GA 30301

RE: MUR 2989
Gary W. Rollins

Dear Mr. Rollins:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Gary W. Rollins

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Gary W. Rollins made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$1,000 - 5/17/85 $1,000 - 11/7/85	$2,000

Because these contributions were for the primary election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Gary W. Rollins violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

John M. Roig
9600 W. Sample Rd., Ste 201
Coral Springs, FL 33065

RE: MUR 2989
John M. Roig

Dear Mr. Roig:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: John M. Roig

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that John M. Roig made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,650 for the 1986 Republican U.S. Senate **General** election in Georgia. Information on these contributions is presented below:

General Date	**Total Contributed for the General**	**Total Excessives in the General**
11/4/86	$2,500 - 9/15/86 $150 - 9/23/86	$1,650

Because these contributions were for the **General** election, they exceed the contribution limitations of the Act by $1,650. Therefore, there is reason to believe that John M. Roig violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Joe W. Rogers, Jr.
2133 Lavista Exec. Park
Tucker, GA 30084

RE: MUR 2989
Joe W. Rogers, Jr.

Dear Mr. Rogers:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Joe W. Rogers, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Joe W. Rogers, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$1,000 - 5/28/85 $1,000 - 6/12/86	$2,000

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Joe W. Rogers, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

2304351468 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Bryce Peterson
2324 Williamsburg Circle
West Jordan, UT 84084

RE: MUR 2989
Bryce Peterson

Dear Mr. Peterson:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Bryce Peterson

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Bryce Peterson made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,000 - 10/1/86 $500 - 10/1/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Bryce Peterson violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

W. A. Orender
4332 Beltwood Parkway South
Dallas, TX 75234

RE: MUR 2989
W. A. Orender

Dear Mr. Orender:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: W. A. Orender

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that W. A. Orender made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/15/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that W. A. Orender violated 2 U.S.C. § 441a(a)(1)(A).

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

R. Danny Murray
4144 Cedar Knoll Dr.
Tucker, GA 30084

RE: MUR 2989
R. Danny Murray

Dear Mr. Murray:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: R. Danny Murray

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that R. Danny Murray made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,475 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/16/86 $600 - 9/22/86 $375 - 10/1/86	$2,475

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $2,475. Therefore, there is reason to believe that R. Danny Murray violated 2 U.S.C. § 441a(a)(1)(A).

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

A. Minis, Jr.
P.O. Box 23559
Savannah, GA 31403

RE: MUR 2989
A. Minis, Jr.

Dear Mr. Minis:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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.

9304351146922

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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: A. Minis, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that A. Minis, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,100 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$100 - 2/27/84 $1,000 - 5/15/85	$1,100

Because these contributions were for the general election, they exceed the contribution limitations of the Act by $1,100. Therefore, there is reason to believe that A. Minis, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Marion R. Buisson
2622 Club Drive
Snellville, GA 30278

RE: MUR 2989
Marion R. Buisson

Dear Ms. Buisson:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Marion R. Buisson

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Marion R. Buisson made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,000 - 10/9/86 $500 - 10/9/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Marion R. Buisson violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Carl Bolch, Jr.
2625 Cumberland Pkwy, NW, Ste 100
Atlanta, GA 30339

RE: MUR 2989
Carl Bolch, Jr.

Dear Mr. Bolch:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Carl Bolch, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Carl Bolch, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$1,000 - 6/5/85 $1,000 - 7/24/86	$2,000

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Carl Bolch, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351470 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Clayton P. Boardman, Jr.
15 Highgate West
Augusta, GA 30909

RE: MUR 2989
Clayton P. Boardman, Jr.

Dear Mr. Boardman:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Clayton P. Boardman, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Clayton P. Boardman, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,250 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$250 - 11/17/83 $1,000 - 5/27/85	$1,250

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,250. Therefore, there is reason to believe that Clayton P. Boardman, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351470 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Ron Bloomingkemper
10203 Birchridge Dr., Ste W
Humble, TX 77338

RE: MUR 2989
Ron Bloomingkemper

Dear Mr. Bloomingkemper:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Ron Bloomingkemper

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Ron Bloomingkemper made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,750 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,000 - 9/30/86 $1,750 - 9/30/86	$2,750

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $2,750. Therefore, there is reason to believe that Ron Bloomingkemper violated 2 U.S.C. § 441a(a)(1)(A).

9304351470 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

J.E. Barrow
145 Burch Road
Fayetteville, GA 30214

RE: MUR 2989
J.E. Barrow

Dear Mr. Barrow:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: J.E. Barrow

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that J.E. Barrow made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,000 - 10/21/86 $1,500 - 12/15/86	$2,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $2,500. Therefore, there is reason to believe that J.E. Barrow violated 2 U.S.C. § 441a(a)(1)(A).

9304351470 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Kenneth W. Anderton
Route 1, Box 340 B
Collierville, TN 38017

RE: MUR 2989
Kenneth W. Anderton

Dear Mr. Anderton:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Kenneth W. Anderton

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Kenneth W. Anderton made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/19/86	$2,000

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Kenneth W. Anderton violated 2 U.S.C. § 441a(a)(1)(A).

9304351471 2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

M.C. Anderson
P.O. Box 7034
Garden City, GA 31408

RE: MUR 2989
M.C. Anderson

Dear Mr. Anderson:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: M.C. Anderson

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that M.C. Anderson made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $3,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$3,000 - 5/31/85 $250 - 6/14/85	$3,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $3,000. Therefore, there is reason to believe that M.C. Anderson violated 2 U.S.C. § 441a(a)(1)(A).

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

R.M. Channell
104 North St.
Greensboro, GA 30642

RE: MUR 2989
R.M. Channell

Dear Mr. Channell:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: R.M. Channell

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that R.M. Channell made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,800 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 10/3/86 $300 - 10/13/86	$1,800

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,800. Therefore, there is reason to believe that R.M. Channell violated 2 U.S.C. § 441a(a)(1)(A).

9304351718

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Donald J. Childress
1452 Garmon Ferry Rd.
Atlanta, GA 30327

RE: MUR 2989
Donald J. Childress

Dear Mr. Childress:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Donald J. Childress

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Donald J. Childress made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,250 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$2,250 - 5/15/85	$1,250

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $1,250. Therefore, there is reason to believe that Donald J. Childress violated 2 U.S.C. § 441a(a)(1)(A).

9304351472 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

John A. Conant
2902 Rivermeade Dr.
Atlanta, GA 30327

RE: MUR 2989
John A. Conant

Dear Mr. Conant:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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2304351447223

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: John A. Conant

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that John A. Conant made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,250 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$250 - 9/21/84 $1,000 - 4/8/85 $1,000 - 5/9/85	$2,250

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $2,250. Therefore, there is reason to believe that John A. Conant violated 2 U.S.C. § 441a(a)(1)(A).

9304351447 24

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Walter L. Conner
4129 Diplomat Plaza
Fort Wayne, IN 46806

RE: MUR 2989
Walter L. Conner

Dear Mr. Conner:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Walter L. Conner

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Walter L. Conner made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/9/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Walter L. Conner violated 2 U.S.C. § 441a(a)(1)(A).

9304351447227

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Claude P. Cook
Cook and Company
P.O. Box 458
Lumber City, GA 31549

RE: MUR 2989
Cook and Company

Dear Mr. Cook:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Cook and Company violated 2 U.S.C. § 441a(a)(1)(A), 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 Cook and Company. 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 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 Cook and Company, 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Cook and Company

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Cook and Company made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $5,000 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$2,000 - 6/4/85 $2,000 - 6/4/85 $2,000 - 6/4/85	$5,000

Because these contributions were for the primary election, they exceed the contribution limitations of the Act by $5,000. Therefore, there is reason to believe that Cook and Company violated 2 U.S.C. § 441a(a)(1)(A).

9304351473O

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20,1990

Lovick P. Corn
P.O. Box 140
Columbus, GA 31993

RE: MUR 2989
Lovick P. Corn

Dear Mr. Corn:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Lovick P. Corn

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Lovick P. Corn made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,000 - 10/27/86	$2,000

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Lovick P. Corn violated 2 U.S.C. § 441a(a)(1)(A).

9304351473

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Thomas G. Cousins
2834 Andrews Dr., NW
Atlanta, GA 30305

RE: MUR 2989
Thomas G. Cousins

Dear Mr. Cousins:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Thomas G. Cousins

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Thomas G. Cousins made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$3,000 - 5/31/86	$2,000

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Thomas G. Cousins violated 2 U.S.C. § 441a(a)(1)(A).

9304351473 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Teresa C. Crossland
P.O. Box 1289
Canton, GA 30114

RE: MUR 2989
Teresa C. Crossland

Dear Ms. Crossland:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Teresa C. Crossland

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Teresa C. Crossland made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/10/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Teresa C. Crossland violated 2 U.S.C. § 441a(a)(1)(A).

9304351473 9

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Carol Falcone
150 North Rd.
Hope, RI 02831

RE: MUR 2989
Carol Falcone

Dear Ms. Falcone:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Carol Falcone

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Carol Falcone made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,800 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/23/86	$1,800

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,800. Therefore, there is reason to believe that Carol Falcone violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Lloyd H. Darby, III
P.O. Box 466
Vidalia, GA 30474

RE: MUR 2989
Lloyd H. Darby, III

Dear Mr. Darby:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Lloyd H. Darby, III

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Lloyd H. Darby, III made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,750 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,649.14 - 3/13/86 $1,649.14 - 3/13/86	$2,750

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $2,750. Therefore, there is reason to believe that Lloyd H. Darby, III violated 2 U.S.C. § 441a(a)(1)(A).

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Eugene B. Dawson
P.O. Box 1086
Savannah, GA 31402

RE: MUR 2989
Eugene B. Dawson

Dear Mr. Dawson:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Eugene B. Dawson

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Eugene B. Dawson made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,250 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$250 - 6/9/82 $1,000 - 5/28/85	$1,250

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $1,250. Therefore, there is reason to believe that Eugene B. Dawson violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Frank F. Dineen
3206 Trowbridge
Albany, GA 31707

RE: MUR 2989
Frank F. Dineen

Dear Mr. Dineen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Frank F. Dineen

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Frank F. Dineen made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,800 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$300 - 9/19/86 $2,500 - 9/19/86	$1,800

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,800. Therefore, there is reason to believe that Frank F. Dineen violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

J. Roy Duggan
118 Cater St.
St. Simons Island, GA 31522

RE: MUR 2989
J. Roy Duggan

Dear Mr. Duggan:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: J. Roy Duggan

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that J. Roy Duggan made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,100 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 11/7/83 $1,000 - 5/29/85	$1,100

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,100. Therefore, there is reason to believe that J. Roy Duggan violated 2 U.S.C. § 441a(a)(1)(A).

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

William A. Fickling, Jr.
577 Mulberry St./P.O. Box 209
Macon, GA 31298

RE: MUR 2989
William A. Fickling, Jr.

Dear Mr. Fickling:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: William A. Fickling, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that William A. Fickling, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$1,000 - 6/5/85 $1,000 - 6/5/85	$2,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that William A. Fickling, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Thomas J. Halpin
648 Marydell Dr.
West Chester, PA 19380

RE: MUR 2989
Thomas J. Halpin

Dear Mr. Halpin:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Thomas J. Halpin

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Thomas J. Halpin made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/15/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Thomas J. Halpin violated 2 U.S.C. § 441a(a)(1)(A).

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Thomas S. Hartzog
Box 80728
Atlanta, GA 03066

RE: MUR 2989
Thomas S. Hartzog

Dear Mr. Hartzog:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Thomas S. Hartzog

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Thomas S. Hartzog made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $3,250 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$3,000 - 5/30/85 $1,000 - 6/4/85 $100 - 12/23/85 $100 - 5/12/86 $50 - 7/11/86	$3,250

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $3,250. Therefore, there is reason to believe that Thomas S. Hartzog violated 2 U.S.C. § 441a(a)(1)(A).

9304351476 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

July 20, 1990

Melita E. Hayes
6068 Grand Forest Ct.
Norcross, GA 30092

RE: MUR 2989
Melita E. Hayes

Dear Ms. Hayes:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Melita E. Hayes

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Melita E. Hayes made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,625 for the 1986 Republican U.S. Senate Primary and General elections in Georgia. Information on these contributions is presented below:

Primary and General Dates	Total Contributed for the elections	Total Excessives in the elections
8/12/86	$2,000 - 11/15/85	$2,265
	$125 - 6/24/86	
11/4/86	$2,500 - 10/2/86	

Because these contributions were in excess for each of the Primary and General Elections, they exceed the contribution limitations of the Act by $2,265. Therefore, there is reason to believe that Melita E. Hayes violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Mark D. Hurst
3343 Jean Marie Lane
Gainesville, GA 30506

RE: MUR 2989
Mark D. Hurst

Dear Mr. Hurst:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Mark D. Hurst

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Mark D. Hurst made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$3,000 - 10/30/86	$2,000

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Mark D. Hurst violated 2 U.S.C. § 441a(a)(1)(A).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Susan D. Hurst
3343 Jean Marie Lane
Gainesville, GA 30506

RE: MUR 2989
Susan D. Hurst

Dear Ms. Hurst:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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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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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry

John W. McGarry
Vice Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Susan D. Hurst

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Susan D. Hurst made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $3,000 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$4,000 - 4/18/86	$3,000

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $3,000. Therefore, there is reason to believe that Susan D. Hurst violated 2 U.S.C. § 441a(a)(1)(A).

9304351477 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

A. Jalil
250 Dogwood Lane
Elberton, GA 30635

RE: MUR 2989
A. Jalil

Dear Mr. Jalil:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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.

9304351477 3

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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

9304351477 4

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: A. Jalil

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that A. Jalil made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,100 for the 1986 Republican U.S. Senate **Primary** election in Georgia. Information on these contributions is presented below:

Primary Date	**Total Contributed for the Primary**	**Total Excessives in the Primary**
8/12/86	$2,000 - 5/31/85	$1,100

Because these contributions were for the **Primary** election, they exceed the contribution limitations of the Act by $1,100. Therefore, there is reason to believe that A. Jalil violated 2 U.S.C. § 441a(a)(1)(A).

9304351477 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 20, 1990

Jacob S. Jernigen
459 RICO
Wichita, KS 67204

RE: MUR 2989
Jacob S. Jernigen

Dear Mr. Jernigen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), 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 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.

9304351477 6

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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

John W. McGarry
Vice Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

2304351477

9304351477 8

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: Jacob S. Jernigen

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Jacob S. Jernigen made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$2,500 - 9/26/86	$1,500

Because these contributions were for the General election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that Jacob S. Jernigen violated 2 U.S.C. § 441a(a)(1)(A).

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 JUL 13 PM 3:15

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the matter of	)	
	)	
Northrop Employees Political Action Committee and Colleen McAndrews, as treasurer	)	MUR 2989

GENERAL COUNSEL'S REPORT

On June 19, 1990, the Commission found reason to believe that Northrop Employees Political Action Committee ("the Committee") and Donald E. Groce, as treasurer, violated 2 U.S.C. § 441a(a).[1] However, before sending out the RTB notification letter to the Committee, this Office discovered that the Committee filed an amended Statement of Organization naming Colleen C. McAndrews as treasurer. Because of this change, the notification letter has been addressed to the new treasurer. In the text of the letter, reference was made to Northrop Employees Political Action Committees and "its treasurer" rather than specifically naming Ms. McAndrews. See MUR 3054, General Counsel's Report dated 4-27-90 (The Commission found RTB that Ileana Ros-Lehtinen for Congress and its treasurer had violated the Act. Because the Committee's former treasurer had resigned and no new treasurer had been named, the approved letter was addressed to Representative Ros-Lehtinen. Before sending out the RTB notification, this Office discovered a new treasurer had been

9304351477 9

1. On that same day the Commission also found reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), 441b(a), and 11 C.F.R. § 110.6(c)(3); 72 individuals violated 2 U.S.C. § 441a(a)(1)(A); 16 other political committees violated 2 U.S.C. § 441a(a); and 55 corporate entities violated 2 U.S.C. § 441b(a).

named, so the letter and questions were sent to this new treasurer.)

Lawrence M. Noble
General Counsel

7/12/90
Date

BY: LMN
Lois G. Lerner
Associate General Counsel

Staff person: Elizabeth Campbell

9304351147380

OGC 6954

July 16, 1990

Ms. Lee Ann Elliott
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2989
United Technologies Corp. PAC and
Donald E. Groce as treasurer

Dear Ms. Elliott:

In response to your letter of July 10, 1990, I, as treasurer of the United Technologies Corporation Political Action Committee (C00035683), thank you for the opportunity to demonstrate that UTC PAC did not exceed legal limits in its support of the Mattingly Campaign.

A review of our records indicates that a contribution of $500.00, made in February of 1982 is where the difference occurs. That UTC PAC contribution was made to help Mattingly retire his 1980 debt and was so reported to the Federal Election Commission by our Report on our February 1982 Monthly Report, page 3 of Schedule B (see Attachment).

If you or your staff have any questions, please contact either Matthew D. Ubben, administrator of the UTC PAC, at (202) 785-7471 or Helen M. Houley, our counsel, at (202) 785-7485.

Sincerely,

Donald E. Groce
Treasurer, UTC PAC

DEG/mdu

Enclosures

Political Action Committee

1825 Eye Street, N. W., Suite 700
Washington, D.C. 20006
(202) 785-7469

CHAIRMAN
William F. Paul

TREASURER
Donald E. Groce

AEROSPACE AND DEFENSE
Pratt & Whitney
Sikorsky
Hamilton Standard
Norden

COMMERCIAL AND INDUSTRIAL
Carrier
Otis
UT Automotive

MICROELECTRONICS CENTER
RESEARCH CENTER

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 JUL 17 PM 12: 17

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 JUL 16 PM 5: 07

UNITED TECHNOLOGIES

23043514781

UNITED TECHNOLOGIES CORPORATION POLITICAL ACTION COMMITTEE

SCHEDULE B — ITEMIZED DISBURSEMENTS

Page 3 of 3 for Line Number 21

Name & Address	Purpose of Disbursement	Date	Aggregate	Amount
Friends of Mattingly 714 G Street, S. E. Washington, D. C. 20003	Mack Mattingly, Senator, Georgia, General, Retire 1980 Debt	2/22/82	500.00	500.00
Rousselot '82 Committee P. O. Box 23412 L'Enfant Plaza Station Washington, D. C. 20024	John H. Rousselot, Representative-26, California, Primary	2/22/82	250.00	250.00
Democratic Congressional Dinner Committee P. O. Box 2884 Washington, D. C. 20013	Democratic Congressional Dinner Committee	2/23/82	5,000.00	5,000.00
Beard '82 Committee P. O. Box 1982 Nashville, Tenn. 37202	Robin L. Beard, Senator, Tennessee, Primary	2/25/82	1,000.00	1,000.00
Nancy Johnson for Congress '82 141 South Mountain Road New Britain, Conn. 06052	Nancy Johnson, Representative-6, Connecticut, Primary, designated by C. W. Lard, Assistant Treasurer-Pension Investment Management, United Technologies Corporation	2/2/82	200.00	200.00
Subtotal (this page)				$ 6,950.00
TOTAL				$13,500.00

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Helen M. Houley, Esq.

ADDRESS: United Technologies Corporation
1825 Eye Street, N.W., Suite 700
Washington, D.C. 20006

TELEPHONE: (202) 785-7485

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.

July 16, 1990
Date

Signature

RESPONDENT'S NAME: Donald E. Groce

ADDRESS: United Technologies Corporation
1825 Eye Street, N.W., Suite 700
Washington, D.C. 20006

HOME PHONE:

BUSINESS PHONE: (202) 785-7413

9304351478 83

MUR 2989

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JUL 14 AM 10:33

THE ASSOCIATED GENERAL CONTRACTORS OF AMERICA
POLITICAL ACTION COMMITTEE
1957 E Street, N.W. • Washington, D.C. 20006 • (202) 393-2040

July 12, 1990

Ms. Lee Ann Elliott
Chairman
Federal Election Commission
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 JUL 17 PM 3:30

Dear Ms. Elliott:

In response to your letter dated July 10, 1990, regarding MUR 2989, Associated General Contractors PAC and John R. Gentille as treasurer, we respectfully request a pre-probable cause conciliation.

The excess $500 contribution made to Friends of Mattingly for the 1986 Primary Election was the result of an administrative error and completely unintentional. We inadvertently failed to carry forward the $500 entry of March 4, 1982, and therefore it was not included in the aggregate when the next contribution was made and reported in September 1983.

Following is a breakdown of each contribution to the Mack Mattingly 1986 primary campaign.

$500.00	March 4, 1982	Reported to the FEC on Page 3, Schedule B of our March 1982 monthly report. AGGYTD shown as $500.00.
$1000.00	September 29, 1983	Reported to the FEC on Page 3, Schedule B of our September 1983 monthly report. AGGYTD shown as $1000.00 (the $500 from March 1982 was not picked up).

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

93043514784

$1000.00	February 25, 1985	Reported to the FEC on Page 1, Schedule B of our February 1985 monthly report. AGGYTD shown as $2000.00.
$3000.00	April 5, 1985	Reported to the FEC on Page 4, Schedule B of our April 1985 monthly report. AGGYTD shown as $5000.00.

We hope the fact that all of these contributions were openly reported to the FEC will show that the violation was indeed inadvertent and the result of an administrative oversight. We assure you that we have internal review procedures and reporting controls in place today that prevent such an error from happening again.

If further documentation is required or if there is any other information we can provide to substantiate our request, we will do our best to provide it. We regret the mistake and respectfully request that the Commission approve our request for a pre-probable cause conciliation.

Sincerely,

John R. Gentille
Treasurer
Associated General Contractors PAC
FEC ID #C000829

9304351478 5

OGC 6984

Gold Kist inc. P.O. Box 2210, Atlanta, Ga. 30301 / 244 Perimeter Center Parkway, N.E., Atlanta, Ga. 30346

RECEIVED FEDERAL ELECTION COMMISSION SECRETARIAT
90 JUL 18 AM 10:44

July 17, 1990

VIA FEDERAL EXPRESS

Federal Election Commission
Office of the General Counsel
Washington, DC 20463

ATTN: Ms. Elizabeth Campbell

SUBJECT: MUR 2989; Gold Kist Political Action For Farmers, Inc., and Paul G. Brower as Treasurer

Dear Ms. Campbell:

Pursuant to our telephone conversation of this date, I am enclosing a statement of designation of counsel whereby the above-referenced respondents have authorized me to act as their counsel in this matter.

Please accept this correspondence as the respondents' request for pre-probable cause conciliation in accordance with 11 C.F.R. § 111.18(d). We are hopeful that we will be able to negotiate an appropriate conciliation agreement which will resolve this matter in a mutually satisfactory fashion.

I would appreciate hearing from you, as representative of the General Counsel, as to the appropriate manner of proceeding from this point and as to any other materials and information we can provide for you.

Sincerely,

J. David Dyson
Attorney

JDD:ml:18601
Enclosure

cc: Mr. Paul G. Brower

90 JUL 18 PM 12:29
RECEIVED FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL

2304351147886

Telex: 6827213 Fax: 404-393-5421 Phone: (404) 393-5000

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION COMMISSION
90 JUL 18 AM 10:44

MUR 2989

NAME OF COUNSEL: J. David Dyson
ADDRESS: P. O. Box 2210
Atlanta, GA 30301

TELEPHONE: (404) 393-5328

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.

GOLD KIST POLITICAL ACTION FOR FARMERS, INC.

July 17, 1990
Date

BY: Jack L. Lawrence, Secretary

Paul G. Brower, as Treasurer for GOLD KIST POLITICAL ACTION FOR FARMERS, INC.

July 17, 1990
Date

Paul G. Brower
Paul G. Brower

RESPONDENT'S NAME: GOLD KIST POLITICAL ACTION FOR FARMERS, INC., and PAUL G. BROWER, as Treasurer
ADDRESS: P. O. Box 2210
Atlanta, GA 30301

BUSINESS PHONE: (404) 393-5000

2304351147787

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 JUL 11 PM 4:25

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 11, 1990

SENSITIVE

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

SUBJECT: MUR 2989
Request for Extension of Time

By letter dated July 10, 1990, counsel for Friends of Mattingly and Donald P. Gammon, as treasurer, requested an extension of approximately fifty days in which to respond to the Commission's reason to believe findings against the Respondents, giving the Respondents approximately sixty-five days to respond. (Attachment 1.) The Commission's reason to believe notification was sent out on June 25, 1990, giving the Respondents fifteen days from receipt to respond to the Commission's findings. Counsel for the Respondents explains in his letter that an extension is necessary because both Messrs. Cotten and Gammon were out of the country when the Commission's reason to believe findings were sent out. Mr. Gammon is still out of the country at this time.

The Office of the General Counsel recommends that the Commission grant the requested extension.

This Office also notes that the letters to the political committee respondents in MUR 2989 were sent out on July 10, 1990. Staff of this Office are currently preparing the letters and factual and legal analyses for the 55 corporate entities and 72 individual respondents, which will be sent up for the Chairman's signature as soon as possible. Therefore, granting this extension will not unduly delay the processing of this matter.

RECOMMENDATIONS

1. Grant an extension of fifty days to Friends of Mattingly and Donald P. Gammon, as treasurer.

2. Approve the appropriate letter.

Attachments
1. Request for Extension

9304351478 8

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2989
Friends of Mattingly, and	)	
Donald P. Gammon, as treasurer -	)	
Request for an Extension of Time.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 16, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2989:

1. Grant an extension of fifty days to Friends of Mattingly and Donald P. Gammon, as treasurer, as recommended in the General Counsel's Memorandum dated July 11, 1990.

2. Approve the appropriate letter, as recommended in the General Counsel's Memorandum dated July 11, 1990.

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

Attest:

7/16/90
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wednesday, July 11, 1990 4:25 p.m.
Circulated to the Commission: Thursday, July 12, 1990 11:00 a.m.
Deadline for vote: Monday, July 16, 1990 11:00 a.m.

dh

9304351147789

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1990

Ben Cotten, Esquire
Cotten, Day & Selfon
Twelfth Floor
1899 L St., N.W.
Washington, D.C. 20036

RE: MUR 2989
Friends of Mattingly and
Donald P. Gammon, as
treasurer

Dear Mr. Cotten:

This is in response to your letter dated July 10, 1990, requesting an extension of fifty days to respond to the Federal Election Commission's reason to believe findings against Friends of Mattingly and Donald P. Gammon, as treasurer. After considering the circumstances presented in your letter, the Federal Election Commission has granted the requested extension. Accordingly, your response is due by the close of business on August 31, 1990.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351479 0

HAND DELIVERED

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 JUL 20 AM 10:23

MUR 2989

Bankers Trust Company
280 Park Avenue, New York, New York 10017

Nancy C. O'Connor
Vice President
Government Relations Division
Telephone: 212-850-3535

Mailing Address:
P.O. Box 318, Church Street Station
New York, New York 10008

July 19, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 JUL 20 AM 11:41

Ms. Elizabeth Campbell
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Campbell,

As you recommended in our discussion on Monday, July 16 regarding contributions made by the Bankers Trust New York Corporation Political Action Committee (BTPAC) to the Friends of Mattingly, I am providing you in writing the substance of our conversation. I also wish to express my interest in pursuing pre-probable cause conciliation in resolving this matter.

As you know, the BTPAC made five separate disbursements totalling $7,000 to Mr. Mattingly's campaign committee during the election cycle 1980-86. While the aggregate amount did not exceed the legal limits for combined contributions to primary and general elections, reports filed by me as well as previous PAC treasurers mistakenly identified that the monies exclusively were disbursed for the general election which would have resulted in excessive contributions in connection with the general (not primary, as cited in your notification) election. This designation is attributable to the fact that, because the PAC at that time traditionally had made contributions for an election cycle totalling well below even the $5,000 mark permissible for one election, contributions were routinely designated for the general election. However, in this instance, because $5,000 of the $7,000 had been disbursed prior to the primary in July of 1986, disbursements should have been designated accordingly.

We regret the error in completing the filings relating to Mr. Mattingly's campaign contributions and hope that this letter

2304351479 2

clarifies this matter. Please contact me should you have any additional questions.

Thank you for your assistance.

Sincerely,

Nancy O'Connor
Treasurer

23043514792

OGC 7031

PUBLIC SERVICE POLITICAL ACTION COMMITTEE

1761 Business Center Drive • Suite 230
Reston, Virginia 22090
(703) 438-3966

DAVID Y. DENHOLM
Chairman

ROMAN K. RICE
Treasurer

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 JUL 24 AM 11:43

July 11, 1990

Mr. Jeffrey Long, Legal Counsel
Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

RE: MUR 2989

Dear Mr. Long:

This letter is in response to the letter I received from you today and the ensuing conversation that you had with my assistant, Ms. Carol Good.

After checking back in our files of the 1981-82 election cycle, I found that we had indeed made a $500 primary contribution to the Mack Mattingly senatorial campaign on February 12, 1982. The Public Service Political Action Committee subsequently made three contributions in the 1985-86 election cycle totaling $5000 for his primary race. After checking our records, we now realize that the 1982 contribution did indeed put us over the primary limit. We obviously failed to carry forward the earlier contribution, thus exceeding our total limit by exactly $500.

There was clearly no attempt to exceed the maximum total of $10,000 per election cycle, as our total contribution to the Mattingly campaign totaled just $6,500, all told.

Nevertheless, I apologize for this oversight, and I believe that we have taken positive steps to insure that nothing of this nature will happen in the future. Specifically, we no longer make contributions to U.S. Senate races out of cycle. This should absolutely assure that such an error on our part, however inadvertent, will not reoccur.

I hope that this matter can be resolved expeditiously. If I can be of any further assistance in resolving this matter, please do not hesitate to call me or Ms. Good.

Sincerely,

Roman K. Rice
Treasurer

RKR:cg

90 JUL 24 AM 10:48

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OGC 7049

American Financial Services Association

1101 Fourteenth St. N.W.
Washington, D.C.
20005

(202) 289-0400

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JUL 25 AM 9:30

Political Action Committee

July 24, 1990

Elizabeth Campbell, Esquire
Office of the General Counsel
999 E Street, N.W., 6th Floor
Washington, D.C. 20463

Re: MUR 2989

Dear Ms. Campbell:

In response to Chairman Elliot's letter of July 10, 1990, the American Financial Services Association (AFSA PAC) hereby requests that pre-probable cause conciliation procedures be initiated in the above referenced Matter Under Review.

Please contact me or Frank Salinger, AFSA's General Counsel if you require further information from the AFSA PAC concerning this matter.

Sincerely,

Robert E. McKew
Assistant General Counsel
American Financial Services Association

90 JUL 25 PM 12:06

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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OGC 7053

DAVIS POLK & WARDWELL

1300 I STREET, N.W.
WASHINGTON, D.C. 20005
202-962-7000
FAX: 202-962-7111

WRITER'S DIRECT NUMBER:

1 CHASE MANHATTAN PLAZA
NEW YORK, N.Y. 10005
212-530-4000

499 PARK AVENUE
NEW YORK, N.Y. 10022
212-530-4000

4, PLACE DE LA CONCORDE
75008 PARIS
40.17.36.00

1 FREDERICK'S PLACE
LONDON EC2R 8AB
01-726-6250

TOKIO KAIJO BUILDING SHINKAN
2-1, MARUNOUCHI 1-CHOME
CHIYODA-KU, TOKYO 100
(03) 201-8421

July 25, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 JUL 25 PM 4:04

Re: MUR 2989

Lawrence M. Nobel, Esq.
Federal Election Commission
Washington, D.C. 20463

Dear Sirs:

As indicated by the enclosed Statement of Designation of Counsel, we are acting as counsel to the Morgan Companies Political Action Committee ("MorganPAC") and Cory N. Strupp, as Treasurer, in connection with the above referenced matter and, in that capacity, write this letter in response to the complaint filed by the Federal Election Commission ("FEC") against MorganPAC and its Treasurer.

The FEC alleges that it has reason to believe that MorganPAC and Cory N. Strupp as its Treasurer violated 2 U.S.C. § 441a(a)(2)(A), which prohibits a multi-candidate committee from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $5,000 in any election. We understand that the FEC bases this assertion upon a review of reports filed by the Friends of Mattingly Committee (the "Mattingly Committee") and by the John Warner Invitational Golf Tournament Committee (the "Warner Committee"). The amount of the alleged excess contribution is $500.

We believe that no action should be taken against MorganPAC or its Treasurer because no violation of 2 U.S.C. § 441a(a) has occurred. Rather, a contribution intended for Senator Mattingly's 1986 general election and reported by the Mattingly Committee as such, apparently has been incorrectly reported as earmarked towards Senator Mattingly's 1986 primary election by the Warner Committee. We hereby request pre-probable cause conciliation, pursuant to 11 C.F.R. § 111.18(d), to resolve this matter.

We believe that the alleged excess contribution is due to a misunderstanding by a third party, the Warner Committee, regarding the proper election for which the MorganPAC

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contribution was intended and for which the funds were in all likelihood used. At no time did MorganPAC exceed the contribution limitations.

Additionally, Cory N. Strupp has been improperly named by the FEC. Cory N. Strupp became Treasurer of MorganPAC on March 3, 1987. Although the Federal Election Campaign Act of 1971, as amended ("the Act") imposes certain duties upon treasurers of multicandidate committees, the Act does not impose personal liability upon persons acting as treasurers for violations of the Act by the committee prior to that person's tenure as treasurer.

FEC records show that MorganPAC contributed a total of $9,500 to the Mattingly Committee in the 85-86 election cycle. The proper allocation of that sum is $4,500 towards the primary and $5,000 towards the general. FEC records show the following contributions by MorganPAC to the Mattingly Committee during the 1986 election cycle:

Date of Check	Amount	Mattingly Committee FEC Reports
1/30/85	$1,000	1985 Mid-year Report *
3/14/86	$3,500	1986 April Quarterly Report ** (Schedule A Primary Contributions)
3/14/86	$1,500	1986 April Quarterly Report *** (Schedule A General Contributions)
4/21/86	$1,000	1986 April Quarterly Report **** (Schedule A General Contributions)
9/17/86	$2,500	1986 Pre-General Report *****

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* Attached as Exhibit A, FEC # 85SEN/009/2276, itemization of line 11c at FEC # 85SEN/009/2506.

** Attached as Exhibit B. FEC # 86SEN/015/3612, Schedule A, itemized receipts for primary at page 14 (FEC # 86SEN/015/4088.

*** Attached as Exhibit C. Schedule A, itemized receipts for general election at page 2 (FEC # 86SEN/015/4001).

**** Attached as Exhibit C. Same as above.

***** Attached as Exhibit D. FEC # 86SEN/040/2725.

9304351147796

The apparent confusion regarding MorganPAC contributions concerns the allocation of a $1,000 contribution by Morgan in the spring of 1986. MorganPAC contributed $1,000, by check dated April 21, 1986, (the "April 1986 contribution") to the Mattingly Committee in connection with the John Warner Invitational Golf Classic, a political fundraiser for several Republican Senatorial incumbents, which was held on June 7, 1986. See Exhibit E (Photocopy of the cover letter and the check to the Mattingly Committee). This contribution was properly reported by the Mattingly Committee in its 1986 July Quarterly report as a contribution towards the general election. See Exhibit C (Itemized schedule of receipts for general election). MorganPAC had previously given $1,000 by check dated January 30, 1985 and $3,500 by a portion of check dated March 14, 1986. Thus, total contributions to Mattingly's primary election were $4,500.

The Warner Committee filed a Mid-year 1986 Report which itemized contributions earmarked to the campaigns of various incumbent Republican Senators who were seeking reelection in 1986, including a list of contributions earmarked to the Mattingly Committee. The April 1986 contribution is listed on page 16 of that schedule as attributed to Mattingly's primary campaign. This was an error. See Exhibit F (Schedule A, page 16 of Warner Committee 1986 Mid-year Report). A review of MorganPAC's checkbook, copies of which will be produced upon request, reveals only one $1,000 check written to the Mattingly Committee in 1986.

Although FEC records describe the Warner Committee list of earmarked contributions to the Mattingly Committee as an amendment to its previous quarterly report, there is no correspondence included in the records indicating that the Mattingly Committee intended to redesignate the April 1986 contribution from the general to the primary election. MorganPAC never authorized such a redesignation. Until receiving the "reason to believe" notice from the FEC, MorganPAC never received any indication that the April 1986 contribution had been accounted for other than as a contribution to Senator Mattingly's 1986 general election campaign.

MorganPAC had previously taken affirmative steps to place the Mattingly Committee on notice and to avoid violating the limits imposed by 2 U.S.C. § 441a(a)(2)(A). MorganPAC had designated in writing on April 2, 1986 that a $5,000 contribution to the Mattingly Committee be split, allocating $3,500 to the 1986 primary and $1,500 to the 1986 general election (the "split contribution"). See Exhibit G (Photocopy of letter from

2304351479 7

MorganPAC to Mattingly Committee and check for $5,000). A notation on the letter indicates that this allocation resulted from the "primary/general break down issue," an indirect reference to contribution limits. This contribution, of course, predates the 1986 April contribution and placed the Mattingly Committee on notice regarding MorganPAC's concern with the contribution limits. The Mattingly Committee apparently heeded this notice, because the 1986 April contribution was reported by that committee as a contribution to the general election, as Exhibit C clearly demonstrates.

Under regulations promulgated pursuant to the Act, multicandidate committees are encouraged, but not required, to designate the particular election for which a contribution is intended for purposes of determining whether a contribution is within the $5,000 per election limitations. The regulations provide that contributions not designated in writing apply to the next election for that Federal office after the contribution is made. 11 C.F.R. § 110.2(b)(2)(ii). According to the Election Division of the Secretary of State of Georgia, the Republican primary election for the Senate seat occurred on August 12, 1986. Thus, under the regulations, any undesignated contribution received by a federal candidate from Georgia prior to August 12 could be attributed to the primary election.

MorganPAC acknowledges that neither the check nor the letter transmitting the 1986 April contribution specifically designates an election.* Given that the fundraising event occurred in June, two months prior to the primary, it is understandable that the Warner Committee might have attributed an apparently undesignated contribution to the imminent primary. Such a designation was not necessary, however, following the split contribution. The check for the 1986 April contribution was made out to the Mattingly Committee, which actually received the contribution and which had a duty, pursuant to 11 C.F.R. § 110.9(a), not to accept contributions in violation of the limits under the Act. The Mattingly Committee did not in fact attribute the April 1986 contribution to the primary, reporting it instead as a contribution to the general election. Thus, no violation of 2 U.S.C. § 441a(a)(2)(A) occurred. The funds were allocated to, and presumably expended in, Senator Mattingly's general election campaign.

---

* MorganPAC now follows the practice of earmarking to a specific election all contributions to any candidates for federal office.

2304351479 8

Any contention that the April 1986 contribution should be allocated to the primary because there was no designation on Exhibit E is countervailed by (1) the fact that the Mattingly Committee reported the contribution under funds received for the 1986 general election and, in compliance with the requirements of 11 C.F.R. § 102.9(e), either placed the funds in a separate account for the general election or included the amount of the contribution in a separate bookkeeping entry for the general election and (2) the absence of any correspondence between the FEC and Mattingly Committee redesignating the contribution from the general election to the primary, a practice which the Mattingly Committee clearly followed. See e.g., Exhibit H (example of such a redesignation).

Regarding the personal liability of Cory N. Strupp as Treasurer of MorganPAC, we know of no provision of the Act which imposes the equivalent of "successor liability" upon persons acting as treasurers of political committees under the Act for prior violations by the political committee. Under the Act, treasurers have certain obligations, e.g., to maintain records and to file certain periodic reports. 2 U.S.C. § 432(c) and 2 U.S.C. § 434(a). These obligations are described in greater detail under regulations promulgated by the FEC pursuant to authority granted in the Act. See e.g., 11 C.F.R. § 104.1(a). The enforcement provisions of the Act, 2 U.S.C. § 437g, do not, however, impose liability for existing violations of the Act upon succeeding Treasurers. To the extent that there has been a violation, which we deny, Cory N. Strupp as Treasurer of MorganPAC is not liable for that violation.

We believe that the facts, including the fact that the total amount contributed by MorganPAC to the Mattingly Committee during the 1985-86 elections cycle was $9,500, clearly demonstrate an intent to comply with the contribution limits imposed by the Act. Given that the total contributions comply with the overall maximum of $10,000 that MorganPAC could have contributed to Mattingly's primary and general election campaigns, it is sensible to interpret the allocation of the contributions as complying with the specific per election limits. In sum, the basis of the allegation that MorganPAC exceeded the contribution limits for Mattingly's primary appears to be a third party report filed on behalf of the Mattingly committee. We believe that no such violation occurred because the $1,000 April 1986 contribution was, in fact, properly attributed to the Mattingly 1986 general election campaign.

2304351479 9

We look forward to the opportunity of resolving this matter with the General Counsel's Office.

Very truly yours,

Richard Moe

Attachments

9304351 48800

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Richard Moe, Esq.

ADDRESS: Davis Polk & Wardwell
1300 I Street
Washington, D.C. 20005

TELEPHONE: 202-962-7190

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.

7/13/90
Date

Signature

RESPONDENT'S NAME: The Morgan Companies Political Action Committee and Cory N. Strupp, as Treasurer

ADDRESS: 60 Wall Street
New York, NY 10260

HOME PHONE:

BUSINESS PHONE: 212-648-3407

2304351480 1

06C7054

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 JUL 25 AM 11:45

250 Dogwood Lane
Elberton, Georgia 30635
404/283-7130

July 23, 1990

Mr. John W. McGarry
Vice President
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2989
A. Jalil

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 JUL 25 PM 4:40

2304351480 2

Dear Mr. McGarry:

I have to acknowledge your letter of July 20, 1990 in the above regard.

The contribution of $2,000.00 was both from me and my wife and this information was put on the form returned to the candidates committee.

Talking to Ms. Elizabeth Campbell of your office this afternoon, I was informed that either there should have been two checks written or copy of the information provided to the candidate retained as proof.

No violation of law was ever intended by me and it is a technical error and hope the commission will take this into consideration. If at all required I am willing to enter into conciliation.

I thank you for your consideration. I promise not to make any further contributions without proper safeguards.

Yours truly,

A. Jalil

AJ/bsm

06C 7065

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL UNIT

90 JUL 26 AM 9:27

THOMPSON & McMULLAN
1101 KING STREET, SUITE 390
ALEXANDRIA, VIRGINIA 22314

TELEPHONE (703) 684-2000
TELECOPIER (703) 684-5109
TELEX 265016 OTESUR

RICHMOND OFFICE
100 SHOCKOE SLIP
RICHMOND, VIRGINIA 23219
TELEPHONE (804) 649-7545
TELECOPIER (804) 780-1813

21 July 1990

Jeffrey Long, Esq.
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2989
Flowers Industries Inc. PAC
Earl Quigg, Treasurer

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 JUL 26 AM 11:41

Dear Mr. Long:

Enclosed please find an affidavit of response to the Legal and Factual Analysis received by my clients on the 13th of July. There are in addition four exhibits referred to in the affidavit.

I believe this should resolve the matter questioned, but if there are further matters to be discussed, please contact my office in Alexandria, Virginia, and they will be able to contact me since I will be on vacation until August 19th. Thereafter, I will be at 1712 Glenhouse Dr. Sarasota, Florida, 34231, or can be reached at telephone number (813) 966-6920.

Very Truly Yours,

James F. Schoener

James F. Schoener
Of Counsel

2304351480 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: James F. Schoener, Esq.

ADDRESS: 1712 Glenhouse Dr. #315
Sarasota, Florida 34231

TELEPHONE: (813) 966-6920 or (703) 684-2000

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.

7-19-90
Date

Earl Quigg
Signature Earl Quigg, Treasurer

RESPONDENT'S NAME: Flowers Industries PAC

ADDRESS: U.S. Hwy 19 South
P.O. Box 1338
Thomasville, Georgia 31799

HOME PHONE:

BUSINESS PHONE: (912) 226-9110

2304351480 4

FEDERAL ELECTION COMMISSION

MUR: 2989

RESPONDENT: Flowers INDUSTRIES INC. PAC
AND EARL QUIGG, AS TREASURER

Earl Quigg, being duly sworn, deposes and says as follows:

1. That he is the treasurer of the Flowers Industries Inc. PAC and makes this affidavit in such capacity.

2. Certain contributions were made in the year 1985 to the campaign for reelection of Senator Mack Mattingly to the United States Senate.

3. The first contribution was made to the Mattingly primary campaign for 1986, pursuant to the recommendation of the political action committee on February 12, 1985 (see attached Exhibit A). The check #329 dated February 13, 1985 for the sum of $2,500 (see attached Exhibit B) was sent pursuant to such recommendation.

4. The second contribution was made pursuant to a later recommendation of the committee held on June 3, 1985 (see attached Exhibit C). This $5000 contribution was intended for the general election and the check issued pursuant to such recommendation, dated June 3, 1983, check #338 (see attached Exhibit D) was clearly marked "General Election Fund" on the face of the check.

2304351480 5

5. If these contributions were not correctly reported to the Federal Election Commission, it is requested that this affidavit stand as a correction of such records.

Earl Quigg

Earl Quigg, Treasurer

STATE OF GEORGIA

COUNTY OF THOMAS

eqa/txtj

On this 20th day of July 1990, personally appeared Earl Quigg who having been first sworn said that he is familiar with the facts and records here involved and that the statements made are true and correct to his best knowledge and belief.

Martha D. Garfield

Notary Public, State of Georgia

Notary Public, Thomas County, Georgia
My Commission Expires March 31, 1993

James F. Schoener

James F. Schoener
Counsel for Respondent
1712 Glenhouse Dr. #315
Sarasota, Florida 34231
Telephone:(813)966-6920

23043514806

Exhibit A

FLO-PAC POLL

DATE February 12, 1985

TOPIC Recommended to the Committee to contribute $2,500 to Mack Mattingly

FLO-PAC MEMBERS:

Janice Anderson - sick
Martha Barfield - Yes
Bob Cagle - Yes
Marta Jones - Yes
Earl Quigg - Yes
Scott Rich - Yes
Bob Ayers - Yes
John Wilson - Yes

Per Robert D. Ayers
Robert D. Ayers

Advisor: G. Tony Campbell

9304351480 7

Exhibit B

9304351148008

FLOWERS INDUSTRIES
POLITICAL ACTION COMMITTEE
P. O. BOX 1338
THOMASVILLE, GA 31792

329

64-933
812

FEBRUARY 13, 1985

PAY TO THE ORDER OF MACK MATTINGLY ---------- $ 2,500.00

TWO THOUSAND - FIVE HUNDRED DOLLARS AND NO CENTS---------- DOLLARS

Commercial Bank
THOMASVILLE GEORGIA 31792

FOR _____

Earl G. Flowers

⑆061209332⑆ 017 286 6⑈

Exhibit C

FLO-PAC POLL

DATE June 3, 1985

TOPIC Recommended to the Committee to contribute $1,000 to Edd Hargett (Hargett for Congress) - 1st District, Texas-Special Runnoff 6/29/85

$5,000 to Mack Mattingly for New 1986 Campaign Kick-Off (Friends of Mattingly Committee)

FLO-PAC MEMBERS:

Janice Anderson - Yes
Martha Barfield - Yes
Bob Cagle -
Marta Jones - Yes
Earl Quigg - Yes
Scott Rich - Yes
Bob Ayers - Yes
John Wilson - Out of Town

Per Robert D. Ayers

Advisor: G. Tony Campbell

9304351-4809

Exhibit D

C04351481 10

FLOWERS INDUSTRIES
POLITICAL ACTION COMMITTEE
P. O. BOX 1338
THOMASVILLE, GA 31792

338

64-933
612

June 3 19 85

PAY TO THE ORDER OF Friends of Mattingly Committee $ 5,000.00

Five Thousand and No/100---------- DOLLARS

Commercial Bank
THOMASVILLE, GEORGIA 31792

FOR General Election Fund

⑆061209332⑆ 017 286 6⑈

ThePrudential

John E. DeWald, CLU, FLMI
Assistant General Counsel
Law Department

The Prudential Insurance Company of America
751 Broad Street, Newark, NJ 07102-3777
201 802-8940 Fax: 201 802-8180

OGC 7044

July 23, 1990

VIA: FACSIMILE

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 JUL 26 PM 3:15

Hon. Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.C. 20463

ATTENTION: Elizabeth Campbell
and Jeffrey Long

Re: **MUR 2989**
THE PRUDENTIAL INSURANCE COMPANY OF AMERICA
FEDERAL PAC AND MILAN E. JOHNSON AS TREASURER

Dear Chairman Elliott:

This will acknowledge receipt of your letter dated July 10, 1990 and received July 20, 1990 on the referenced matter.

I enclose an executed Statement of Designation of Counsel.

Please be advised that I have been informed that the relevant files are being researched to respond to the findings asserted in your letter.

I will contact your office as soon as I have had the opportunity to review the results of this search.

In the meantime, please feel free to contact me if there are any further questions on this matter.

Thank you very much.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 JUL 26 PM 4:07

Very truly yours,

John E. DeWald

John E. DeWald
Assistant General Counsel

JED/vdm
Enclosure

2304351481

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: John E. DeWald, Esq.

ADDRESS: 751 Broad Street, 13-Plaza
Newark, NJ 07101-3777

TELEPHONE: (201) 802-8940

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.

7/24/90
Date

Signature

RESPONDENT'S NAME: The Prudential Insurance Company of America Federal PAC, Milan E. Johnson, Treasurer

ADDRESS: 751 Broad Street, 3-Plaza
Newark, NJ 07101-3777

HOME PHONE:

BUSINESS PHONE: (201) 802-7129

2304351481812

OGC 7078

July 26, 1990

MUR 2989

I can find no record that my wife + I contributed to Pia Campaign.

Please send copies of cancelled Checks so I can verify.

Sincerely

C. P. Boardman

(Boardman, Jr.)

9304351481813

HAND DELIVERED

06C7079

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JUL 27 AM 10:29

The Dun & Bradstreet Corporation

Philip C. Danford
Assistant Treasurer

299 Park Avenue, New York, NY 10171
212-593-6626

July 25, 1990

Federal Election Commission
999 E. Street, N.W.
Washington, DC 20463
Attn: Ms. Elizabeth Campbell

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 JUL 27 PM 2:40

Re: MUR 2989

Dear Sirs:

I refer to your letter of July 10, 1990 regarding excessive contributions by the PAC of The Dun & Bradstreet Corporation to The Friends of Mattingly Committee in connection with the 1986 primary election.

Having checked our records, it appears that a clerical error was committed when allocating the PAC's contributions between the primary and general elections. Our firm intent was to make all contributions within the limits set by the Federal Election Campaign Act. However, when listing our contributions, we erroneously recorded all of the contributions as contributions to the general election whereas the first $4,333.34 should have been recorded as contributions to the primary election. If the proper allocations had been recorded, we would have come within the $5,000 limit for contributions to each election. Our aggregate contributions also came well within the $10,000 aggregate amount that could be contributed to both elections.

We sincerely regret the error and apologize for it. If no more expeditious way to close the file is possible, we would request the opening of pre-probable cause conciliation procedures with a view to entering into a conciliation agreement pursuant to 11 C.F.R. §111.18(d).

I enclose the Statement of Designation of Counsel appointing Ms. Ellenore O'Hanrahan, attorney, of The Dun & Bradstreet Corporation's legal department, as our counsel in this matter and authorizing her to receive any

2304351481 4

notifications and other communications from the Commission and to act on my and the PAC's behalf before the Commission.

Sincerely,

Philip C. Danford

Enclosure

23043514815

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: ELLENORE O'HANRAHAN, ATTORNEY

ADDRESS: THE DUN & BRADSTREET CORPORATION
299 PARK AVENUE
23RD FLOOR
NEW YORK, NEW YORK 10171

TELEPHONE: (212) 593-6563

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

July 25, 1990
Date

Philip C. Danford
Signature

RESPONDENT'S NAME: PHILIP C. DANFORD, TREASURER

ADDRESS: PAC OF THE DUN & BRADSTREET CORPORATION
600 MARYLAND AVENUE
SUITE 240
WASHINGTON, DC 20024

HOME PHONE:

BUSINESS PHONE: (212) 593-6626

9304351481816

HAND DELIVERED

06C7077

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JUL 27 AM 10:31

ALSTON & BIRD
A Partnership including Professional Corporations

One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309-3424
404-881-7000

Telecopier: 404-881-7777
Telex: 54-2996

Timothy S. Perry
Direct Dial: 404-881-7543

Galleria Offices

100 Galleria Parkway
Suite 1200
Atlanta, Georgia 30339-3195
404-881-7000

Telecopier: 404-881-7733

July 26, 1990

90 JUL 27 PM 2:40

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

VIA FEDERAL EXPRESS

Federal Election Commission
Washington, D.C. 20463
Attention: Elizabeth Campbell

Re: MUR 2989

Dear Ms. Campbell:

This letter is in response to your letter dated July 10, 1990 which was received by The Citizens and Southern Georgia Corporation Better Government Committee I ("BGC I") and James D. Dixon, its Treasurer, on July 13, 1990. I enclose the Statement of Designation of Counsel for your records.

Your letter of July 10 was prompted by the Commission's review of reports filed by Friends of Mattingly (the "Mattingly Committee") which, as you will see from the materials contained here, incorrectly reflect contributions in connection with the 1986 Primary Election in Georgia to Mack Mattingly in excess of $5,000.

I enclose a letter dated July 25, 1985 ("Designation Letter") from BGC I to the Mattingly Committee designating contributions in excess of $5,000 for use in the General Election instead of the Primary. In the Commission's review of the records of the Mattingly Committee you may not have come across this written designation.

The Designation Letter satisfies the requirements of Regulations § 110.1 (cross-referenced in § 110.2(a)(1)) in effect both on January 1, 1985 and on January 1, 1986 that a contribution be "designated in writing for a particular election" in order for a contribution to be made with respect to a future election. The Designation Letter designates only $5,000 to the Primary, and all further contributions (which I believe equalled $3,708.34) to the General Election.

2304351481817

ALSTON&BIRD
A Partnership including Professional Corporations

BGC I's reports filed with the FEC reflect a total of $8,708.34 of contributions to the Mattingly Committee. Of this total $5,000 is designated to "Primary"; $3,583.34 is designated to "Other - Runoff" (since there ultimately was no runoff, a fact BGC I could not know in 1985 when it filed its reports since the primary was held in 1986, this entry on the BGC I reports should be read as "General"); and $125 is designated to General.

BGC I designated in writing to the Mattingly Committee that only $5,000 of its contributions be allocated to the Primary. BGC I's reports filed with the Commission state the same maximum allocation to the Primary.

I hope that with this new information the Commission will be able to determine that no further action should be taken since BGC I did not violate the $5,000 maximum on its contributions to the Mattingly Committee as to the Primary.

I will be out of the office until August 27th, but should there be any need for further information, please contact Bill Venema at (404) 881-7651.

Cordially,

Timothy S. Perry

185PERRY/mva
Enclosure

cc: William Venema, Esq.

2304351481818

Citizens and Southern Georgia Corporation
Better Government Committee I

99 Annex, Atlanta, Georgia 30399

July 25, 1985

Friends of Mattingly
P. O. Box 1986
Atlanta, Georgia 30301-1986

RE: Designation of Contributions for
General Election Campaign

Gentlemen:

This is to formalize our notification to you that the contributions made to you by Citizens and Southern Georgia Corporation Better Government Committee I in excess of $5,000 are designated for use in the General Election. These amounts would include a portion of the contributions received by you in the form of checks dated May 21, 1985 and all of the contribution received by you in the form of a check dated June 20, 1985.

Sincerely,

CITIZENS AND SOUTHERN GEORGIA
CORPORATE BETTER GOVERNMENT
COMMITTEE I.

By: _____

Lee M. Sessions, Jr.
Chairman

9304351481819

CORP. COMMUNICATIONS TEL No.404-581-5440 Jul 13.90 12:43 No.004 P.04

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Alston & Bird (including Tim Perry and Bill Venama)

ADDRESS: One Atlantic Center
1201 West Peachtree Street
Atlanta, Georgia 30309-3424

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.

7-25-90
Date

Citizens & Southern Georgia Corporation
Better Government Committee I and
James D. Dixon as Treasurer
Signature

RESPONDENT'S NAME: Citizens & Southern Georgia Corporation
Better Government Committee I and James D. Dixon

ADDRESS: P. O. Box 4899 - 12 Main
Atlanta, Georgia 30302

HOME PHONE:

BUSINESS PHONE: 404-581-4837

9304351482 0

OGC 7075-

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 JUL 27 AM 10:45

July 24, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 JUL 27 PM 2:40

Federal Election Commission
Office of General Counsel
Washington, D. C. 20463

ATTENTION: JEFFREY LONG or ELIZABETH CAMPBELL

Re: Your File: MUR 2989
C. M. Leger

Dear Madam or Sir:

This is in response to the letter from the Commission dated July 20, 1990, a copy of which is attached for your convenient reference. Also attached is a copy of the FEDERAL ELECTION COMMISSION FACTUAL AND LEGAL ANALYSIS which was mailed to me with the letter of July 20, 1990.

The contribution I made on 5/23/83 was intended to be for the primary election. The contribution I made 5/28/85 was intended to be for the general election which followed. Although both contributions were made before the primary, it was my intent as I have stated and I believe the problem arises by the manner of the reporting to the Commission by the Friends of Mattingly.

I am aware that the maximum contribution for each election of a candidate for federal office is $1,000.00. In the manner that I handled my contributions, there was no intent to violate the law, nor do I believe that I have, in fact, violated the law.

I hope that this explanation will resolve the matter. Your favorable consideration in this regard will indeed be appreciated.

Sincerely yours,

C. M. Leger

C. M. Leger
674 Hatley Road
Cordele, Georgia 31015

2304351482 1

OGC 7106

J. BARNETT WOODRUFF
P. O. Box 750
Columbus, Georgia 31902-0750

90 JUL 30 AM 10:12

July 25, 1990

90 JUL 30 PM 2:49

Federal Election Commission
Washington, D. C.

re MUR 2989
Emily Woodruff

Attn: Ms. Elizabeth Campbell

Dear Ms. Campbell;

I spoke with you yesterday in regard to the above case (my sister) and also on my case. (My case is responded to in a seperate letter)

My sister, Emily, is represented by me thru a Power of Attorney. A copy of this is enclosed.

Her memory was getting poor as far back as 1982 ; in Oct 1988 she was able to write her last check. Since then I have been making all of her busines decisions.

Emily's records show that she made a contribution to Sen. Mattingly's campaign of $ 1000 in June 1985. This was for the primary and evidently was not listed on your Factual Analysis.

The $ 50 shown as being paid on 1/29/86 was evidently for a local fund raiser without my knowledge and she had forgotten that she had given the $ 1,000 six months earlier.

The $ 1000 that was given on 10/24/86 was for the General election, being as it was two months after the Primary, and a few weeks before the General Election.

This would put her $ 50 over for the Primary and nothing over for the General. I hope that this will be thought of as an honest mistake and further action will not be taken. Please let me know what should be done further.

Sincerely,

J. Barnett Woodruff
Atty in Fact for
Emily Woodruff

9304351148822

GENERAL POWER OF ATTORNEY

1052

STATE OF GEORGIA

COUNTY OF MUSCOGEE

I, EMILY WOODRUFF, of Muscogee County, Georgia do hereby constitute and appoint J. BARNETT WOODRUFF as my true and lawful agent and attorney-in-fact (hereinafter referred to as my "Agent"), for me and in my name, place and stead to look after, manage and transact all and every part of my business, and generally, and until this Power of Attorney is revoked, to represent me and to act for me in any and all matters in which I am or may be interested, as fully and completely as I could do if personally present.

Should J. BARNETT WOODRUFF die, then I do hereby constitute and appoint KATHERINE WOODRUFF WILLIAMS as my true and lawful agent and attorney-in-fact (after the death of J. BARNETT WOODRUFF hereinafter referred to as my "Agent"), for me and in my name, place and stead to look after, manage and transact all and every part of my business, and generally, and from the time of the death of J. BARNETT WOODRUFF until this Power of Attorney is revoked, to represent me and to act for me in any and all matters in which I am or may be interested, as fully and completely as I could do if personally present.

Without in any way limiting the generality of the foregoing, my Agent is authorized and empowered to sign, execute and deliver checks on any and all banks, associations

930435148 23

and depositories where I now or may hereafter have a deposit or deposits; to make deposits therein and to withdraw funds therefrom; to endorse any and all checks, bills, notes, orders or other writings; to collect, receive and receipt for all monies, property or other things due me; to sign or endorse any and all papers or writings requiring my signature or endorsement; to collect all loans, dividends, income, claims or debts owing to me, and to give proper receipt therefor; to sell, exchange or otherwise dispose of any of my property, real or personal, tangible or intangible, at such price and on such terms and conditions as my Agent may deem best; to purchase for me any property, real or personal, tangible or intangible, at such price and on such terms as my Agent may see fit; to look after, manage, control, and generally to deal with all property of every kind, real or personal, tangible or intangible, belonging to me or in which I am interested, and to make all contracts, agreements and arrangements in connection therewith as my Agent may deem to be in my interest; to employ other persons, whether individual or corporate, to assist my Agent with the execution of the powers granted hereunder, and to pay reasonable compensation for such services; to settle, pay, and adjust all debts, bills, claims or demands of whatever kind or nature against me; to execute deeds, bills of sale, conveyances, assignments, stock powers and transfers of any and every kind and character, of any property, real or personal, tangible or intangible, belonging to me or in which I have an

9304351 48824

interest; to borrow money on my behalf, and in my name to execute notes evidencing such indebtedness and to secure the same by deed, mortgage, assignment or hypothecation of any real or personal, tangible or intangible, property, contracts or writings of any kind or character which I may now or hereafter own or have an interest in; to vote in person or by proxy any corporate stock or other securities of mine and to agree to or take any other action in regard to any reorganization, merger, consolidation, liquidation, bankruptcy or other procedure or proceeding affecting any stock, bond, note or other property in which I have any interest; to enter into any safe deposit box that I may have and remove any of the contents therefrom; to make gifts to qualified charitable organizations, to persons related to me by blood, marriage or adoption and to my friends, and any such gifts may be in excess of amounts qualifying for the annual exclusions from gift tax as set out in Internal Revenue Code Sections 2503(b), (c) and (e); and to prepare or have prepared and to execute income tax returns and other tax returns on my behalf.

I do hereby ratify, approve and confirm the acts of my Agent done under this Power of Attorney, and pronounce the same as valid and binding as if done by me in person.

My Agent is further authorized and empowered to transfer all of my property, real or personal, or any portion thereof, to the Trustee or Trustees of the Revocable Inter Vivos Trust Indenture created by me on October 9, 1984 or to

9304351 4825

the trustee or trustees of any other trust created by me, to be held, administered and distributed in all respects as if it had originally been a part of said Trust or such other trust into which my property may be transferred, and to modify, amend, revoke or terminate said Trust or any other revocable trusts created by me at any time, whether in whole or in part.

This Power of Attorney is made in contemplation of, and is not to be revoked by, any determination made subsequent to the date of execution of this instrument that I am unable properly to manage my affairs.

I reserve the right to revoke this Power of Attorney at any time, but only by instrument in writing signed by me and delivered to my Agent.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal, this the 21 day of July, 1987.

Emily Woodruff
EMILY WOODRUFF

Signed, sealed and delivered
on the 21 day of July, 1987,
in the presence of:

Ruby O. Starling

Diana Ruth Townson
Notary Public

JUL 15 '88 JUL 18 '88
FILED RECORDED
JAMES L. STUBBS, CLERK, S.C.M.C. GA.

3043514826

MUR 2989

J. BARNETT WOODRUFF
P. O. Box 750
Columbus, Georgia 31902-0750

July 25, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 JUL 30 AM 10:10

Federal Election Commission
Washington, D.C.

RE: MUR 2989
J. Barnett Woodruff

Attn: Ms. Elizabeth Campbell

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 JUL 30 PM 2:49

Dear Ms. Campbell;

Thank you for the helpful way in which you responded to my phone call yesterday in regard to the above.

I have searched my files for the time period involved and believe I have found the checks to which you refer. Photos of these checks are enclosed.

check dated 4/2/85 for $ 1000 was intended for thePrimary

" " 5/29/85 for $ 2000 was for a fund raiser in Atlanta, and was for my daughter and son in law (as shown on the check) for the record, they are;
Mr. Harry L. Williams (photographer)
Mrs. Katherine W. ~~Woodruffx~~ Williams
(housewife)
4192 Club Drive, NE
Atlanta, Ga. 30319

This check also intended for the Primary.

check dated 10/24/86 for $ 2000 was intended for the General election being over 2 months after the Primary, and less than two weeks before the General
It was also intended to be half given by my wife,
Frances S. Woodruff (housewife)
1909 Carter Ave
Columbus, Ga. 31902 (same address as mine)

I hope that you can do something for me, and not require me to hire an expensive attorney. Please let me know what further action I should take.

Sincerely,

J. Barnett Woodruff

9304351483827

J. BARNETT WOODRUFF

858

1985 04-12-85

PAY TO THE ORDER OF Friends of Mattingly $ 1000 00

One thousand & no/100 DOLLARS

First National
The First National Bank of Columbus
Columbus, Georgia 31902

J. BARNETT WOODRUFF

FOR

J. Barnett Woodruff

J. BARNETT WOODRUFF

877

1985 20 05-10-85

PAY TO THE ORDER OF Re. Tribute to the President $ 2000 00

Two thousand & no/100 DOLLARS

First National
The First National Bank of Columbus
Columbus, Georgia 31902

J. BARNETT WOODRUFF

FOR Mr & Mrs Harry L Williams III

J. Barnett Woodruff

J. BARNETT WOODRUFF

308

1986 20 04-24-86

PAY TO THE ORDER OF Victory '86 $ 2000 00

Two thousand & no/100 DOLLARS

First National
The First National Bank of Columbus
Columbus, Georgia 31902

J. BARNETT WOODRUFF 154

FOR

J. Barnett Woodruff

06C 7108

HAND DELIVERED

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JUL 30 AM 10:13

SIMMONS & McANDREWS
ATTORNEYS AND COUNSELORS AT LAW
1441 FOURTH STREET
SANTA MONICA, CALIFORNIA 90401

(213) 458-1405
FAX (213) 394-4028

COLLEEN CONWAY McANDREWS
JERRY MARGARET SIMMONS

VIA FEDERAL EXPRESS

July 27, 1990

90 JUL 30 PM 2:49

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Jeffrey Long, Esq.
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: MUR 2989
Northrop Employees Political Action Committee

Dear Mr. Long:

Colleen C. McAndrews of this firm assumed the Treasurership of Northrop Employees Political Action Committee on April 24, 1990. She received your letter concerning MUR 2989 on July 23, 1990. As we discussed on the telephone this morning, our office did not serve as Treasurer during the period of time in question nor do we have copies of the reports or backup material for reports which were filed by NEPAC during that period of time. I am advised that some of this information is currently in storage. Due to the fact that it will take some time to retrieve this information in order to respond, we hereby request an extension of time to respond.

I also mentioned during our conversation that two of the enclosures which were said to be included along with the letter were in fact missing. The omitted enclosures are the enforcement procedures as well as the Designation of Counsel Form.

Based on the information contained in this letter, we respectfully request that this extension of time be granted.

Sincerely yours,

Jerry Margaret Simmons

JMS/dm

9301351402 9

OGC 7098

OFFICE
(912) 233-6606

HOME
(912) 598-0268

EUGENE B. DAWSON
P.O. BOX 1086
SAVANNAH, GEORGIA 31498-2101

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 JUL 30 AM 10:57

July 25, 1990

Federal Election Commission
Washington, D. C. 20463

ATTENTION: Mr. Jeffrey Long

REFERENCE: MUR 2989
Eugene B. Dawson

Dear Mr. Long:

Confirming our telephone conversation of today,(the contributions made to Mack Mattingly in 1982 and 1985.)

The contribution made 6-9-82 in the amount of $250.00 was a contribution toward the debt that Senator Mattingly had incurred in his 1980 campaign for the Senate. The $1,000.00 contribution on 5-15-85 was for his campaign for the Senate in 1986. He had no opposition on the Republican ticket and my contribution was for the general election race against Wyche Fowler.

I hope this will resolve the matter, but should you have further questions I will be most happy to respond in any way to clear up the matter.

With kindest regards I am,

Very truly yours,

Eugene B. Dawson

Eugene B. Dawson
EBD:aw

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 JUL 30 PM 2:48

2304351483830

SIMMONS & McANDREWS
ATTORNEYS AND COUNSELORS AT LAW
1441 FOURTH STREET
SANTA MONICA, CALIFORNIA 90401

COLLEEN CONWAY MCANDREWS
JERRY MARGARET SIMMONS

(213) 458-405
FAX (213) 394-4028

90 JUL 30 AM 10:13

VIA FEDERAL EXPRESS

July 27, 1990

90 JUL 30 PM 2:49

Jeffrey Long, Esq.
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

RE: MUR 2989
Northrop Employees Political Action Committee

Dear Mr. Long:

Colleen C. McAndrews of this firm assumed the Treasurership of Northrop Employees Political Action Committee on April 24, 1990. She received your letter concerning MUR 2989 on July 23, 1990. As we discussed on the telephone this morning, our office did not serve as Treasurer during the period of time in question nor do we have copies of the reports or backup material for reports which were filed by NEPAC during that period of time. I am advised that some of this information is currently in storage. Due to the fact that it will take some time to retrieve this information in order to respond, we hereby request an extension of time to respond.

I also mentioned during our conversation that two of the enclosures which were said to be included along with the letter were in fact missing. The omitted enclosures are the enforcement procedures as well as the Designation of Counsel Form.

Based on the information contained in this letter, we respectfully request that this extension of time be granted.

Sincerely yours,

Jerry Margaret Simmons

JMS/dm

9304351483 1

OGC 7125

POWELL, GOLDSTEIN, FRAZER & MURPHY

ATTORNEYS AT LAW

SUITE 1050
400 PERIMETER CENTER TERRACE
ATLANTA, GEORGIA 30346
404 399-2800

SIXTH FLOOR
1001 PENNSYLVANIA AVENUE, N.W.
WASHINGTON, D.C. 20004
202 347-0066

SUITE 800
900 CIRCLE 75 PARKWAY
ATLANTA, GEORGIA 30339

404 951-5800
TELEX 4979842
PGFM CIR
TELECOPIER 404 951-5839

ELEVENTH FLOOR
THE CITIZENS & SOUTHERN NATIONAL BANK BUILDING
35 BROAD STREET, N.W.
ATLANTA, GEORGIA 30335
404 572-6600

July 27, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 JUL 30 PM 3:24

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 JUL 31 PM 4:21

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2989
Frank Love, Jr.

Dear Mr. McGarry:

This will acknowledge receipt of your letter of July 20.

I have gone through my records and retrieved the checks representing contributions to Mattingly in the time frame discussed in your letter. I enclose copies of same herewith. The $250.00 check dated June 10, 1982 was to help defray the debt incurred by Senator Mattingly in his 1980 campaign. The November 2, 1983 check in the amount of $1,000.00 was for the 1986 Primary, and the check payable to "Georgia Tribute To The President" of May 28, 1985 in the amount of $1,000.00 was for the General Election.

I am scrupulous in my efforts to abide by the Federal Election Laws and should I ever violate them, it would be through inadvertence. This, however, is not a violation inadvertent or otherwise. It is not clear from your correspondence under what circumstances you require an affidavit, but if you need this information in affidavit form, please advise.

Very truly yours,

Frank Love, Jr.

FL:j

Enclosure

9304351483 2

FRANK LOVE, JR.
1100 C & S BANK BLDG.
ATLANTA, GA. 30303

2376

64-5
610

June 10 19 82

PAY TO THE ORDER OF Friends of Mattingly $250.00

Two Hundred Fifty and 00/100---------- DOLLARS

C&S The Citizens and Southern National Bank Atlanta, Georgia

FOR Contribution

FRANK LOVE JR.
1100 C&S BANK BLDG.
ATLANTA, GA 30335

4500

64-5
610

⑆262 4277 02 01- November 2[illegible]83

PAY TO THE ORDER OF Friends of Mattingly $1,000.00

One Thousand and 00/100---------- DOLLARS

C&S The Citizens and Southern National Bank Atlanta, Georgia

FOR Contribution

FRANK LOVE JR.
1100 C&S BANK BLDG.
ATLANTA, GA 30335

5182

May 28 19 85

64-5
610

PAY TO THE ORDER OF Georgia Tribute to the President $1,000.00

One Thousand and 00/100---------- DOLLARS

C&S The Citizens and Southern National Bank Atlanta, Georgia

FOR Contribution

930435148333

MUR 2989
RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 JUL 30 PM 2:30

NALU 100
1890-1990
CENTENNIAL
Celebrating the past • Building the future

LAW AND
GOVERNMENT AFFAIRS
DEPARTMENT

Senior Vice President
and General Counsel
H. James Douds

Vice President,
Government Affairs
Michael L. Kerley

Vice President, Law
William B. Scher, Jr.

Writer's Direct Dial Number
202/331-6022

Senior Associate General Counsel
William N. Albus, CLU

Associate General Counsel
William R. Anderson
David A. Winston
Danea M. Kehoe

Counsel
David E. Hebert
Gary A. Sanders

July 27, 1990

90 JUL 30 PM 3:24

BY MESSENGER

The Honorable Lee Ann Elliott
Chairman
Federal Election Commission
Washington, DC 20463

90 JUL 31 PM 4:21
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Re: MUR 2989, National Association of Life Underwriters PAC and Bruce C. Hendrickson as Treasurer

Dear Chairman Elliott:

Thank you for your letter dated July 10 concerning MUR 2989. The National Association of Life Underwriters Political Action Committee (NALUPAC) and its connected organization, the National Association of Life Underwriters, are pleased to cooperate with the Commission to resolve this matter in an expeditious manner. As indicated on the enclosed Statement of Designation of Counsel, I have been designated counsel on behalf of NALUPAC in the above-entitled matter. I am an attorney on the staff of the National Association of Life Underwriters.

The Commission's factional and legal analysis indicates that the issue involves a contribution made on October 23, 1986 by the National Association of Life Underwriters Political Action Committee to the "Friends of Mattingly Committee" in the amount of $3,850. According to our FEC Reports (copies enclosed), NALUPAC contributed a total of $5,000 to the primary election and $5,000 to the general election in compliance with 2 U.S.C. 441a(a)(2)(A).

A copy of the check (number 4207 dated October 23, 1986) is also enclosed. While the contribution was made after the primary election date, the check and NALUPAC's FEC

9304351483 4

Report (covering the period October 16, 1986 to November 24, 1986) clearly indicate that it was intended to retire the debt from the primary campaign. The PAC contribution was made in good faith reliance upon information supplied by the Mattingly campaign that it had incurred a primary campaign debt.

This is not a situation in which NALUPAC was in command of the facts. The information concerning the debt was supplied by the Mattingly campaign, and NALUPAC acted in reliance upon its representations. It was plausible that the Mattingly campaign had incurred a primary debt and there was no reason for NALUPAC to doubt the veracity of the information.

The information given to us by the Commission leads us to believe that the Mattingly campaign deposited the contribution for the primary campaign debt and rolled it over into the general campaign. Since the Mattingly campaign had complete command of the facts in this case, it should have notified NALUPAC of the situation and refunded NALUPAC's contribution. If there was, in fact, no primary debt, we would appreciate the assistance of the Commission in recovering these funds from the Mattingly campaign committee.

NALU is desirous of resolving this matter and hereby requests an opportunity to pursue this matter through conciliation. As our records indicate, the contribution was intended to help retire a primary campaign debt (a fairly common practice here in Washington). Under no circumstances did NALUPAC intend to breach the applicable campaign contribution limits.

Thank you for the opportunity to comment on this matter. If I can be of further assistance to the Commission in this matter, please do not hesitate to contact me.

Sincerely,

Michael L. Kerley
Vice President
Government Affairs

MLK:les

Enclosures

cc: Bruce C. Hendrickson, CLU, ChFC, Chairman, NALUPAC
H. James Douds, Senior Vice President & General Counsel, NALU
Judith A. Chalukoff, Director, NALUPAC

2304351483835

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Michael L. Kerley

ADDRESS: 1922 F Street, NW
Washington, DC 20006-4387

TELEPHONE: 202/331-6022

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.

July 26, 1990
Date

Bruce C. Hendrickson
Signature

RESPONDENT'S NAME: Bruce C. Hendrickson

ADDRESS: National Association of Life Underwriters
Political Action Committee
1922 F Street, NW, Washington, DC 20006-4387

HOME PHONE:

BUSINESS PHONE: 202/331-6004

2930435148336

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)

National Association of Life Underwriters Political Action Committee

Address (Number and Street)

1922 F Street, NW

City, State and ZIP Code

Washington, DC 20006

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00005249

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ 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)
- ☐ Monthly Report for _____
- ☐ 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

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 10-16-86 Through 11-24-86		
6. (a) Cash on Hand January 1, 19 86		$ 226,743.31
(b) Cash on Hand at Beginning of Reporting Period	$ 181,927.94	
(c) Total Receipts (from Line 18)	$ 83,340.80	$ 876,200.43
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	$ 265,268.74	$ 1,102,943.74
7. Total Disbursements (from Line 28)	$ 121,680.00	$ 959,355.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	$ 143,588.74	$ 143,588.74
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

Austin Adkinson, Asst. Treasurer
Type or Print Name of Treasurer

Austin Adkinson
SIGNATURE OF TREASURER

12-1-86
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, 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.

FEC FORM 3X (3/80)

23043514837

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

Name of Committee (in Full)
National Association of Life Underwriters Political Action Committee

	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Full Name, Mailing Address and ZIP Code Coble For Congress Box 177 Greensboro, NC 27402	Howard Coble $3500.00 NC-6 Disbursement for: ☐ Primary ☒ General ☐ Other (specify): 1986	10-23-86	$ 500.00
B. Full Name, Mailing Address and ZIP Code Friends of Mattingly Committee Box 1986 Atlanta, GA 30301	Purpose of Disbursement Mack Mattingly $5150.00 GA-SEN Disbursement for: ☐ Primary ☒ General ☐ Other (specify): 1986	Date (month, day, year) 10-23-86	Amount of Each Disbursement This Period $1150.00
C. Full Name, Mailing Address and ZIP Code Friends of Mattingly Committee Box 1986 Atlanta, GA 30301	Purpose of Disbursement Mack Mattingly $9000.00 GA-SEN Disbursement for: ☒ Primary ☐ General ☐ Other (specify): '86 Debt	Date (month, day, year) 10-23-86	Amount of Each Disbursement This Period $3850.00
D. Full Name, Mailing Address and ZIP Code Sonny Montgomery For Congress Box 5252 Meridian, MS 39302	Purpose of Disbursement Gillespie V. Montgomery $ 500.00 MS-3 Disbursement for: ☐ Primary ☒ General ☐ Other (specify): 1986	Date (month, day, year) 10-24-86	Amount of Each Disbursement This Period $ 500.00
E. Full Name, Mailing Address and ZIP Code Holloway For Congress Box 340 Forest Hills, LA 71430	Purpose of Disbursement Clyde Holloway $1000.00 LA-8 Disbursement for: ☐ Primary ☒ General ☐ Other (specify): 1986	Date (month, day, year) 10-24-86	Amount of Each Disbursement This Period $ 500.00
F. Full Name, Mailing Address and ZIP Code Breaux For Senate 3050 Teddy Drive, Suite A Baton Rouge, LA 70809	Purpose of Disbursement John Breaux LA-SEN $10,000.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify): 1986	Date (month, day, year) 10-24-86	Amount of Each Disbursement This Period $5000.00
G. Full Name, Mailing Address and ZIP Code Walgren For Congress 2090 Greentree Road Pittsburgh, PA 15220	Purpose of Disbursement Doug Walgren PA-18 $500.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify): 1986	Date (month, day, year) 10-25-86	Amount of Each Disbursement This Period $500.00
H. Full Name, Mailing Address and ZIP Code Citizens for Jack Kemp Box 217 Hamburg, NY 14075	Purpose of Disbursement Jack Kemp NY-31 $500.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify): 1986	Date (month, day, year) 10-25-86	Amount of Each Disbursement This Period $500.00
I. Full Name, Mailing Address and ZIP Code Neall For Congress Box 1044 Severna Park, MD 21146	Purpose of Disbursement Robert R. Neall MD-4 $1000.00 Disbursement for: ☐ Primary ☒ General ☐ Other (specify): 1986	Date (month, day, year) 10-25-86	Amount of Each Disbursement This Period $1000.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

23043514838

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)
National Association of Life Underwriters Political Action Committee

Address (Number and Street)
1922 F Street, NW

City, State and ZIP Code
Washington, DC 20006

☐ Check if address is different than previously reported.

2. FEC Identification Number

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ 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)
- ☒ Monthly Report for September 1986
- ☐ 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

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 9-01-86 Through 9-30-96		
6. (a) Cash on Hand January 1, 1986		$ 226,743.31
(b) Cash on Hand at Beginning of Reporting Period	$ 265,618.41	
(c) Total Receipts (from Line 18)	$ 51,871.02	$ 719,209.12
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	$ 317,489.43	$ 945,952.43
7. Total Disbursements (from Line 28)	$ 112,220.00	$ 740,683.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	$ 205,269.43	$ 205,269.43
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	$ –	
10. 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.

Austin Adkinson, Asst. Treasurer
Type or Print Name of Treasurer

Austin Adkinson 10-2-86
SIGNATURE OF TREASURER Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

FEC FORM 3X (3/80)

23043514839

SCHEDULE B

ITEMIZED [redacted] BURSEMENTS

Use [redacted] te schedule(s) for [redacted] tegory of the Det[redacted] Summary Page

PAGE 2 OF 8

FOR LINE NUMBER 21

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

NAME OF COMMITTEE (in Full)
National Association of Life Underwriters Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Joe Sevario For Congress Cmte 208 E. Railroad, #8 Gonzales, LA 70737	Joe Sevario LA-8 $3000.00 Disbursement for [X] Primary [ ] General [ ] Other (specify) 1986	9-16-86	$2000.00
B. Full Name, Mailing Address and ZIP Code Mike DeWine For Re-Election Committee 140 Kinsey Road Xenia, OH 45385	Purpose of Disbursement Mike DeWine OH-7 $500.00 Disbursement for [ ] Primary [X] General [ ] Other (specify) 1986	Date (month, day, year) 9-16-86	Amount of Each Disbursement This Period $500.00
C. Full Name, Mailing Address and ZIP Code Friends of Ron Packard Box 1549 Carlsbad, CA 92008	Purpose of Disbursement Ronald C. Packard CA-43 $1000.00 Disbursement for [ ] Primary [X] General [ ] Other (specify) 1986	Date (month, day, year) 9-18-86	Amount of Each Disbursement This Period $500.00
D. Full Name, Mailing Address and ZIP Code Committee For Tim Wirth PO Box 75428 Washington, 20013	Purpose of Disbursement Tim Wirth CO-SEN $2500.00 Disbursement for [ ] Primary [X] General [ ] Other (specify) 1986	Date (month, day, year) 9-18-86	Amount of Each Disbursement This Period $2000.00
E. Full Name, Mailing Address and ZIP Code Ken Kramer '86 101 University Blvd. #330 Denver, CO 80206	Purpose of Disbursement Ken Kramer CO-SEN $2500.00 Disbursement for: [ ] Primary [X] General [ ] Other (specify) 1986	Date (month, day, year) 9-18-86	Amount of Each Disbursement This Period $2500.00
F. Full Name, Mailing Address and ZIP Code Committee to Re-elect Congress-woman Nancy Johnson Box 1986 New Britain, CT 06050	Purpose of Disbursement Nancy Johnson CT-6 $1300.00 Disbursement for: [ ] Primary [X] General [ ] Other (specify) 1986	Date (month, day, year) 9-18-86	Amount of Each Disbursement This Period $500.00
G. Full Name, Mailing Address and ZIP Code Friends of Mattingly Committee Box 1986 Atlanta, GA 30301	Purpose of Disbursement Mack Mattingly GA-SEN $4000.00 Disbursement for: [ ] Primary [ ] General [X] [ ] Other (specify) 1986	Date (month, day, year) 9-18-86	Amount of Each Disbursement This Period $3850.00
H. Full Name, Mailing Address and ZIP Code Friends of Daniel K. Akaka Box 3169 Honolulu, HI 96812	Purpose of Disbursement Daniel K. Akaka HI-2 $500.00 Disbursement for: [X] Primary [ ] General [ ] Other (specify) 1986	Date (month, day, year) 9-18-86	Amount of Each Disbursement This Period $500.00
I. Full Name, Mailing Address and ZIP Code Davis For Congress Box 2397 Joliet, IL 60434	Purpose of Disbursement Jack Davis IL-4 $2000.00 Disbursement for [ ] Primary [X] General [ ] Other (specify) 1986	Date (month, day, year) 9-18-86	Amount of Each Disbursement This Period $2000.00

SUBTOTAL of Disbursements This Page (optional) .....

TOTAL This Period (last page this line number only) .....

23435147840

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)

National Association of Life Underwriters Political Action Committee

Address (Number and Street)

1922 "F" Street, NW

City, State and ZIP Code

Washington, DC 20006

☐ Check if address is different than previously reported.

2. FEC Identification Number

C00005249

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ 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)
- ☒ Monthly Report for February 1986
- ☐ 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

(b) Is this Report an Amendment? ☐ YES ☒ NO

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 02-01-86 Through 02-28-86		
6. (a) Cash on Hand January 1, 1986		$ 221,743.31
(b) Cash on Hand at Beginning of Reporting Period	$ 235,736.87	
(c) Total Receipts (from Line 18)	$ 94,829.22	$ 153,022.78
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	$ 330,566.09	$ 374,766.09
7. Total Disbursements (from Line 28)	$ 38,965.00	$ 83,165.00
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	$ 291,601.09	$ 291,601.09
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ -0-	

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

Austin Adkinson, Asst. Treasurer
Type or Print Name of Treasurer

Austin Adkinson
SIGNATURE OF TREASURER

3-6-86
Date

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

NOTE: Submission of false, erroneous, 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.

FEC FORM 3X (3/80)

2304355(4841

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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

Name of Committee (in Full)
National Association of Life Underwriters Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Nelson Campaign Committee 444 N. Capitol #711 Washington, DC 20001	Bill Nelson FL 11 $250.00 Disbursement for: XX Primary ☐ General ☐ Other (specify): 1986	2-19-86	250.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Friends of Mattingly Committee Box 1986 Atlanta, 30301	Mack Mattingly GA SEN $150.00 Disbursement for: X Primary ☐ General ☐ Other (specify): 1986	2-20-86	150.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Citizens for Cardiss Collins 210 7th St. SE #1984C Washington, DC 20003	Cardiss Collins IL 7 $2000.00 Disbursement for: X Primary ☐ General ☐ Other (specify): 1986	2-21-86	2000.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Alan J. Dixon for Senate Committee - 245 2nd St. NE Washington, DC 20002	Alan J. Dixon IL SEN $5000.00 Disbursement for: ☐ Primary X General ☐ Other (specify): 1986	2-21-86	5000.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Manton for Congress 46-12 Queens Blvd. #210A Sunnyside, NY 11104	Thomas J. Manton NY9 $1000.00 Disbursement for: ☐ Primary ☐ General X Other (specify): 1986	2-21-86	1000.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Carroll Hubbard for Congress Committee - Box 562 Paducah, KY 42002	Carroll Hubbard KY 1 $1000.00 Disbursement for: XX Primary ☐ General ☐ Other (specify): 1986	2-21-86	1000.00
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Larry Smith for Congress Committee - 4747 Hollywood Blvd. Hollywood, FL 33021	Larry Smith FL 16 $1000.00 Disbursement for: X Primary ☐ General ☐ Other (specify): 1986	2-21-86	1000.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Hal Daub for Congress Box 6333 Omaha, NE 68106	Hal Daub NE 2 $1000.00 Disbursement for: X Primary ☐ General ☐ Other (specify): 1986	2-21-86	1000.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement / Disbursement for	Date (month, day, year)	Amount of Each Disbursement This Period
Pennsylvanians for Paul Kanjorski - 3422 Belfry Lane Woodbridge, VA 22193	Paul Kanjorski PA 11 $1000.00 Disbursement for: XX Primary ☐ General ☐ Other (specify): 1986	2-21-86	1000.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

93043514842

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)

National Association of Life Underwriters Political Action Committee

Address (Number and Street)

1922 F Street, NW

City, State and ZIP Code

Washington, DC 20006

☐ Check if address is different than previously reported.

2. FEC Identification Number
C00005249

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☐ 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)
- ☒ Monthly Report for October
- ☐ 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

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY	Column A This Period	Column B Calendar Year-to-Date
5. Covering Period 10-1-83 Through 10-30-83		
6. (a) Cash on Hand January 1, 1983		$ 42449.08
(b) Cash on Hand at Beginning of Reporting Period	$ 333863.42	
(c) Total Receipts (from Line 18)	$ 56183.97	$ 588192.56
(d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)	$ 390047.39	$ 630641.64
7. Total Disbursements (from Line 28)	$ 52800.00	$ 293394.25
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))	$ 337247.39	$ 337247.39
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)	$ .00	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ .00	

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

Austin Adkinson
Type or Print Name of Treasurer

Austin Adkinson
SIGNATURE OF TREASURER

11-14-83
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

FEC FORM 3X (3/80)

SCHEDULE B **ITEMIZED DISBURSEMENTS**

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Name of Committee (in Full)

National Association of Life Underwriters Political Action Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Lujan Boosters Club Box 2153 Albuquerque, NM 87103	Manuel Lujan NM 1 $750.00 Disbursement for: X Primary ☐ General ☐ Other (specify) 1984	10-5-83	250.00
B. Full Name, Mailing Address and ZIP Code Committee To Reelect Marge Roukema - Box 625 Ridgewood, NJ 07451	Purpose of Disbursement Marge Roukema NJ 5 $500.00 Disbursement for: X Primary ☐ General ☐ Other (specify) 1984	Date (month, day, year) 10-5-84	Amount of Each Disbursement This Period 500.00
C. Full Name, Mailing Address and ZIP Code Friends of Mattingly Committee Box 2997 Washington, DC 20013	Purpose of Disbursement Mack Mattingly GA SEN $1000.00 Disbursement for: X Primary ☐ General ☐ Other (specify) 1986	Date (month, day, year) 10-5-83	Amount of Each Disbursement This Period 1000.00
D. Full Name, Mailing Address and ZIP Code Coughlin for Congress Committee - Box 147 Norristown, PA 19404	Purpose of Disbursement Lawrence Coughlin PA 13 $600.00 Disbursement for: X Primary ☐ General ☐ Other (specify) 1984	Date (month, day, year) 10-5-83	Amount of Each Disbursement This Period 250.00
E. Full Name, Mailing Address and ZIP Code Wes Watkins Campaign Committee - 310 E.Capitol St. Washington, DC 20003	Purpose of Disbursement Wes Watkins OK 3 $200.00 Disbursement for: X Primary ☐ General ☐ Other (specify) 1984	Date (month, day, year) 10-5-83	Amount of Each Disbursement This Period 200.00
F. Full Name, Mailing Address and ZIP Code Rostenkowski for Congress Committee - Box 2884 Washington, DC 20013	Purpose of Disbursement Dan Rostenkowski IL 8 $1500.00 Disbursement for: X Primary ☐ General ☐ Other (specify) 1984	Date (month, day, year) 10-5-83	Amount of Each Disbursement This Period 1500.00
G. Full Name, Mailing Address and ZIP Code Volkmer for Congress Committee - Box 991 Hannibal, MO 63401	Purpose of Disbursement Harold L. Volkmer MO 9 $500.00 Disbursement for: X Primary ☐ General ☐ Other (specify) 1984	Date (month, day, year) 10-6-83	Amount of Each Disbursement This Period 300.00
H. Full Name, Mailing Address and ZIP Code McClure for Senate Committee Box 23412 Washington, DC 20024	Purpose of Disbursement James A. McClure ID SEN $1000.00 Disbursement for: X Primary ☐ General ☐ Other (specify) 1984	Date (month, day, year) 10-6-83	Amount of Each Disbursement This Period 500.00
I. Full Name, Mailing Address and ZIP Code Walgren for Congress Box 8245 Washington, DC 20024	Purpose of Disbursement Doug Walgren PA 18 $250.00 Disbursement for: X Primary ☐ General ☐ Other (specify) 1984	Date (month, day, year) 10-12-83	Amount of Each Disbursement This Period 250.00
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

✓ 84844 30435

NATIONAL SAVINGS & TRUST CO.
WASHINGTON, D.C.

15-52
540

4207

The National Association of Life Underwriters
Political Action Committee (LUPAC)
1922 F STREET N.W.
WASHINGTON, D.C. 20006

PAY Three Thousand Eight Hundred Fifty DOLLARS

DATE	TO THE ORDER OF	CHECK NO.	CHECK AMOUNT
10-23-86	Friends of Mattingly Committee	4207	3850a

1986 PRIMARY DEBT

VOID IF NOT CASHED WITHIN 90 DAYS

Edith L. Clabaugh

"004207" 1:0540005221: 043"6523385" "000038 5000"

.230435I 48845

06C7129

Richard K. Whitehead, Jr.
1216 Zonolite Road, NE
Atlanta, Georgia 30306

July 26, 1990

Office of John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D. C. 20463

ATTENTION: Ms. Elizabeth Campbell REF: MUR 2989

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 JUL 31 PM 4:21

Dear Ms. Campbell:

Per our telephone conversation regarding this matter, enclosed is a copy of my check book stubs showing that on May 29, 1985 I did write a check to "Georgia Tribute to the President" for $2,500.00. I can probably dig through and find the actual canceled check but this may be sufficient for your needs.

Also enclosed is a copy of the Program for the evening. The event was a $500.00 per person affair and I took with me my wife, and three sons to see President Reagan in person, get a picture, etc.

I certainly had no idea that this would constitute an infraction of Federal Law nor apparently the "Georgia Tribute to the President" aware of same.

I have not listed a Designated Counsel as I would rather hope that being a plain citizen, unaware of this particular law, seeking no favors from elected officials, basically inactive in political affairs except voting, and the above mentioned scenario that the case would be dropped. If however, I need to get Counsel I shall and will let you know.

I will await your advice in this matter.

Sincerely,

Richard K. Whitehead, Jr.

Richard K. Whitehead, Jr.

file copy

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 JUL 30 PM 3:24

23043514846

No 2679

5-29 ✓ 19 85

PAY TO Georgia Tribute

FOR to the Pres. Fund

DEPOSIT

DEPOSIT 5-31 4600 36

BALANCE

2500 — AMOUNT THIS CHECK

BALANCE

PRECEDING STUBS

HARLAND - 28

BALANCE BROUGHT FORWARD

No 2680

5-29 ✓ 19 85

PAY TO CITY OF

FOR DECATUR

DEPOSIT

DEPOSIT

BALANCE

1604 99 AMOUNT THIS CHECK

BALANCE

EXPENDITURES ON BACK OF AND INFORMATION ABOUT

HARLAND - 28

755 15
8498 4
1604 99

BALANCE BROUGHT FORWARD

No 2681

5-30 ✓ 19 85

PAY TO Sawnee EMC

FOR

DEPOSIT

DEPOSIT

BALANCE

93

LIST SOURCE OF DEPOSITS



Georgia Tribute to the President
June 5, 1985

9304351148848

Georgia Tribute To The President



President Ronald Reagan
United States Senator Mack Mattingly

Waverly Hotel
Atlanta, Georgia

9 3 0 4 3 5 4 8 4 9

MACK MATTINGLY
United States Senate

June 5, 1985

Dear Friends:

I'm delighted that you could join me today and welcome President Reagan to Atlanta.

This very special Tribute is truly one of the highlights of my Senate Career. Your show of support gives me great pride and encouragement for our 1986 effort. I look forward to continuing to serve you in Washington.

We have planned an exciting evening of entertainment for you and The President. I know you will enjoy every minute of it.

Thank you again and best wishes,

Sincerely,

Mack

Mack Mattingly
United States Senator

PROGRAM

Master of Ceremonies
Paul Coverdell
Chairman, Georgia Republican State Party

Welcome and introduction . . . . . Paul Coverdell

Introduction of
Senator Mack Mattingly . . . . . Paul Coverdell

Introduction of
President Ronald Reagan . . . . . Senator Mack Mattingly

ENTERTAINMENT

North Side High School

Spirit of Atlanta

9 3 0 4 3 5 1 4 8 5 0

TRIBUTE EXECUTIVE CHAIRMAN

Carl Knoblock, Jr.

TRIBUTE EXECUTIVE CO-CHAIRMEN

Paul Coverdell

Sara Moore

CO-CHAIRMEN

Fred Alias
Stanley F. Birch, Jr.
James H. Blanchard
James Caswell, Jr.
Mitt Connerly
Fred Cooper
Jay Crouse
Dr. Lloyd Darby
Archie H. Davis
Mrs. Robert (Jean) Ferst
William A. Fickling, Jr.
William W. Gaston
Johnny Gresham
Joe Hamilton
Joe Hatfield
Richard L. Heffner
Lee Henkle
Virgil Hinson
Doug Howard
A. Anderson Huber
Richard Jackson
Liz Klemann
Charles M. (Buddy) Leger
Bernard Lerman, MD
Mr. & Mrs. Jarvin Levison
William Lord
Charles D. Miller
Guy Millner
Earl Patton, Jr.
Erle Phillips
Alec Poitevint
Joe Rogers, Jr.
Edward J. Rutkowski
Earl Smith
Lillian Webb
Tom Wells

John A. Williams

HOSTS

Stephen A. Abrams
Charles Ackerman
M. C. Anderson
Oliver Bateman
G. Norman Bishop
John A. Boland, Jr.
Senator Heskew Brantly
Mrs. James (Dot) Burns
Ms. Joyce Carter
Sam Choate
H. Dwight Cavanagh, MD
Jack Cofer
Claude Cook
John Corse
Mr. & Mrs. George Fontaine
Mrs. Frank (Carol) Goodman
Hiram E. Greer
Mrs. Jean Hails, CEO
L. S. Hartzog
Johnny Isakson
A. Jalil
Lynn H. Johnston
Betty Jones
Max L. Kunianski
Martell Layfield, Jr.
Ron Levanthal
David Liggett
Clay C. Long
Charles A. Lotz, Jr.
Tom Lowe
George E. Luce
Mr. J. Leonard Morgan, Jr.
Dave Parrish
Carl Patrick
Robert Redfearn
W. Lamont Shepard
Frank Strickland
Eugene Stokey
John Stuckey
Pollard Turman
Claude Williams, Jr.
Stancil O. Wise

Barnett Woodruff

9 3 0 4 3 5 1 4 8 5 1

Abrams, Janet B.
Adams, L. Clifford, Jr.
Aiken, I.M.
Alexander, Roy E.
Alford, Robert S.
Anderson, Dr. James L.
Anderson, Robert
Ansley, Frank T.
Argenbright, Frank & Kathy
Atkins, Bill
Atkins, Stanley
Agurkis, Robert & Diane
Austin, Robert L., Jr.
Averten, Jerry
Bagwell, Thomas
Bailey, John E.
Banks, Gilbert A.
Barge, Alvin
Barnwell, James C., Jr.
Barr, Robert L., Jr.
Barton, Chandler B.
Barton, Charles C. & Eleonor H.
Bateman, Oliver C.
Beauchamp, Mr. & Mrs. John
Beasley, Ernest W.
Beavers, Edward Eugene
Bell, Mrs. H.P.
Bergquist, V.F.
Berstein, Richard Bruce
Bethea, Henry
Betts, Oscar L., Jr.
Beverly, Joe E.
Beavers, Rollie
Biggers, William Joseph
Black, Thomas Jack
Blackburn, Mr. & Mrs. Duke C.
Blackett, Mr. Gladys
Bokhardt, Carl
Bolton, Rowland P.
Bondi, Robert J. J.
Boomershine, Walter M., Jr.
Borders, Wm. Holmes, Sr.
Boring, James C., Jr.
Boring, Kenneth E.
Bottoms, Margaret Lynn Bensel
Bowling, Mrs. Annette
Boyd, Roy J.
Branch, Walter D.
Brandon, Inman
Braselton, J.L.
Breedlove, William H.
Briglevich, George
Brinson, Edward L.
Brooking, E.L.
Brooks, D.W.
Brown, Edwin H.
Brown, H.G.
Brubaker, Robert P.
Bruce, Mr. & Mrs. Edward C.
Brunson, William F.
Buchanan, Bob
Burgess, Mr. Otis
Burkholder, Harold M.
Burnett, Col. Russell A.
Burt, Addison M.
Butler, Michael B.
Buttrill, Marcus W., III
Cade, Major William A., Jr.
Carpenter, Robert E.
Carpenter, J. Robert
Carscallen, Charles H.
Carson, Mrs. E.W.
Carter, Julia
Castleberry, Mrs. Edna G.
Castleberry, J.
Cavenaugh, Harrison
Chandler, Russ
Chatham, J. Howard
Cheatham, Joe L.
Cheek, John H.
Cheney, John A.
Childress, J. Donald
Chilton, Tom
Chitwood, Harold
Clapper, Martha J.
Clark, James L.
Clarke, Thomas Hal
Clary, E.M.
Cleveland, Roy M.
Cochran, Hiram S.
Cofer, H.J., Jr.
Cole, Graham L.
Coles, C.P.
Collar, W.F., Jr.
Collins, Michael
Collins, Preston
Collins, Mary L.
Colton, Russell D.
Combs, Curtis L.
Conant, John A.
Conner, James L.
Cook, Claude P.
Cook, Kenneth B.
Cope, Charles D.
Cooper, A. Burnham
Coplin, J.F.
Coppage, Annie K.
Corse, John D.
Cotsakis, Helen
Coverdell, Paul
Cox, Cader B., III
Crawford, Jerry N.
Craven, Robert L.
Crisp, Charles R.
Croft, Edwards
Crouse, David Galvin
Crouse, John & Laura
Crowley, Ray
Crymes, Marion C.
Daley, Charles S.
Dallis, Mrs. Arwyn F.
Darby, Lloyd H.
Daughtry Hampton L.
Daniel, C. Howard
Daniel, John C.
Daniel, Tracy L.
Darden, Vera T.
Davis, Archie
Davis, E. Wright
Davis, Gordon R., Jr.
Davis, H.A.
Davis, Oscar G.
Davis, P. Jack
Davis R. Carter
Davis, Roe J.
Davis, Mr. & Mrs. Walt
Dawson, Eugene B.
Deaton, Dr. & Mrs. Dorsey M.
Deaver, Joseph W., Jr.
Dees, LaFon C.
Dela Perriere, Jim
Dennis, Donald F., M.D.
Dennis, Wade H.
Denny, Mr. & Mrs. Richard A., Jr.
Dewberry, J. Terry
Dickson, Ian J.
Dixon, Jack A.
Dobes, Dr. & Mrs. William L.
Donaldson, Mr. George P.
Doughty, Robert
Dover, Vinson
Dow Chemical U.S.A. DMPAC
Duggan, J. Roy
Duke, William T.
Dunn, William W.
Dyer, Ben J.
Easterbrooks, Dr. H. Lincoln
Edward, Odell
Edwards, James M.
Edwards, John D., Jr.
Edwards, Mr. Stacy
Efron, Katharina
Elkins, Mary W.
Ellis, William D.
Emery, Madonna G.
Emery, Max
Espy, William W.
Evans, Linton H., Jr.
Exley, Frank M.
Fair, Mrs. Melba Slash
Fairman, Mike
Felder, Frank
Felker, George, III
Ferguson, Henry
Fermanis, Ernest George, MD
Ferst, Robert H.
Ficht, Thomas A.
Fincher, Robert L.
Fink, Friedman
Flaherty, William
Flowers, Joe, Jr.
Fockele, Mr. & Mrs. Lou
Folsom, Randy
Fontaine, George
Forrestal, Tom, Jr.
Forrester, Ruth S.
Forshner, John, Dr.
Foster, Joe C.
Foster, Thomas L.
Fowler, Alpha A., Jr.
Fowler, Hugh
Franklin, James B.
Friedman, Hirsch
Friedman, H.L.
Frink, Edward H.
Gabrielsen, James R.
Gafford, Jerry
Gardner, Joseph G., Jr.
Gardner, William B.
Garmon, Henry B.
Gaston, William W., III
Georgia Fruitcake Company
Georgia Pacific PAC
Germany, T. Gordy
Gillis, Carl
Gilbert, Frederick E., Jr.
Gilmer, Ben S.
Gilmer, E.S.
Goodman, Carol Lanier
Gore, Edwin M.
Gould, Stephen
Goeman, Harry B.
Graeub, Sara Vinson
Graham, Duncan
Grahek, Gary H.
Gramlich, Lt. Col. William
Gramling, Norman W.
Grant, W. King, Sr.
Green, James D.
Greene, Harold
Greenlees, Jack, Sr.
Greer, Hiram E.
Griffis, C.H.
Griffith, Calvin T.
Groton, James P.
Guerin, Robert A., Jr.
Guyton, Robert P.
Hague, Frank
Hails, Jean
Hamilton, Joe, Jr.
Hamilton, S. Keith
Hamilton, Mrs. Raymond C.
Hammett, Don
Hancock, Pierce J.
Hanger, William A.
Hanks, Dr. J. Daniel, Jr.
Hanna, Frank J., Jr.
Harden, Mr. & Mrs. Cliff
Hardin, Allen S.
Hardin, N.A.
Harper, Jerry W.
Harris, George A.
Harris, William H.
Harrison, Charles L.
Harrison, Milton
Hartzog, Thomas
Harvey, J.H., Jr.
Hatcher, Mrs. Robert P.
Hatfield, Benjamin J.
Hauenstein, Mr. & Mrs. W. Richard
Hazelwood, James W.
Helms, John A.
Hendry, Walter
Henley, J. Guy
Hickey, Dr. & Mrs. Judson C.
Hiers, Mary Neel
Hill, Donald K.
Hill, Guy F., Sr.
Hill, Harvey, Jr.
Hill, Mildred J.
Hinson, Virgil H.
Hodges, M.D.
Hodgson, Bryant F., Jr.
Holden, Barry W.
Hollis, Dr. Charles D., Jr.
Holyfield, Mr. J.R.
Honey, William E., Sr.
Hontz, Karen C.
Hoover, Duane L.
Hopper, Mr. & Mrs. Donald N.
Hopple, Dorothy M.
Hopson, William W.
Hout, C. Howard
Howard, James
Howard, Ridley
Howerdd, Eugene, M., Jr.
Hudgens, D. Scott
Hunt, W.S.
Hunter, David
Hutchinson, Joe B.
Inman, William O., III
Irvin, Mrs. W.A.
Isakson, Johnny
Isakson, E.A.
Israel, George
Jalil, Abdul
Jennings, Vera M.
Johnson, Mack A.
Johnson, Huey L.
Johnston, Lynn
Jolley, Lex
Jones, Billy R.
Jones, Ellis O.
Jones, Frank
Jones, Paul R.
Jordan, Mr. & Mrs. A. Timothy
Joyner, Wendell R.
Karp, Arthur
Keen, Mrs. S.D.
Kelley, Charlie A., Jr.
Kelley, James H.
Kelley, Margaret
Kemp, Hugh L.
Kennedy, A.T.
Kennedy, John G.
Kent, Thomas I.
Kern, Robert F.
Kessler, Richard C.
Key, William C.
King, E. Buford, Jr.
King, Mrs. Harvey A.
Kirkman, E.L.
Kirtland, Cliff
Klopman, Alex A.
Knoblock, Carl W., Jr.
Knox, Peter S., Jr.
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Labrot, Andrew Gay
Laird, E.T.
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Lawyer, Delores
Lee, J. Frank
Lee, Nathaniel
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Leonard, James R., MD.
Leonis, Poindexter A.
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Lott, Charles
Love, Frank
Lowe, Thomas M., Jr.
Lowenberg, John D.
Luce, Albert L., Jr.
Luce, George E.
Luce, Joseph P.
McArthur, Mr. & Mrs. W.D.
McCamish, Henry F., Jr.
McClenan, W.E.
McCormick, Anna Louise
McCutchen, Joe K., Jr.
McDaniel, J.R.
McDonald, Mr. & Mrs. John R.
McEachern, John
McGahan, Patrick J.
McGinnis, Alfred
McKenna, Peter Lawrence
McMahon, Donald A.
McMahon, Howard M.
McMullan, John F.
McNair, D.H.
McNair, Mary K.
McNulty, Paul R.
Macomber, John A.
Maddox, Nora G.
Malizia, A.A.
Malone, Cecil C.
Manis, Wheeler
Marchman, Gloria P.
Marett, William W., Jr.
Marshall, Glesch
Martin, Gordon K.
Mason, Clarence F.
Masser, D. Lurton, Jr.
Massey, Virginia B.
Mast, Kent E.
Mathis, T. Harvey
Masey, Steve P.
Meader, Gary
Mendenhall, William R. & Martha P.
Menser, Charles D., Jr.
Miller, Charles D.
Miller, Mr. & Mrs. Dennis L.
Miller, James B., Jr.
Miller, Jeff B.
Miller, John R.
Miller, Ron
Miller, Stuart T.
Milliner, Guy W.
Mingledorff, L.B.
Minis, A., Jr.
Minis, Lorane H.
Mize, Elias P.
Mock, E.R., Jr.
Moore, Sara Giles
Moore, Sheppard N.
Moret, Robert
Morgan, George S.
Morgan, Leonard, Jr.
Morganstern, Steven L., Jr., MD.
Morris, Armond C.
Morris, E. Ray
Morton, Gordon K.
Moss, Truett
Moulton, Mr. John
Mullins, Douglas C.
Muntz, David C.
Muse, Billy
Nash, Franklin
National Association of Realtors PAC
Nazli, Mehmet H., MD.
Nerid, Curtis H.
Nelson, Jack
Newkirk, Thomas E.
Nimick, Dr. Alexander
Nimick, Mrs. Yubica
Nix, A.L.
Nixon, William M.
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Otis, Yvonne
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Rankin, Mrs. Hannas E.
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Roquemore, W.A.
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Ross, V.A.
Rowlands, Gary
Rowlands, Randall

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Rowe, James
Russell, Harold L.
Russell, Nancy H.
Ruth, Mrs. June G.
Rutland, Guy W., Jr.
Ryder, Edward A.
Salter, Mr. & Mrs. Joe
Scherer, Robert P., Jr.
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Schmitz, Warren M.
Schreiber, Victor
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Scott, Cornelius A.
Separk, W. Allen
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Shealy, Finis K.
Shelby, Gary B.
Shelley, Rhuel E.
Shepard, Dan P.
Sheperd, Wm. Clyde, Jr.
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Shiver, C. Olen
Shuler, Calvin L.
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Sigman, T.F., Jr.
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Skinner, B. Franklin
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Smith, Drane
Smith, Hampton S.
Smith, Mr. & Mrs. John D.
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Smith, Leon
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Smithgall, Charles
Snell, William E., DO
Soeder, Frank J., III
Somes, Peter J., MD
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Speiler, David Knisely
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Sullivan, Ms. Dianne
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Taber, Earl M.
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Thomas, Garfield
Thomas, Ossie Milton, Jr.
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Torras, Robert M.
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Trotter, John B.
Trupp, Hans F.
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Tucker, L. Reeder
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Turman, Pollard
Turner, D. Glen
Turner, Ted
Turner, Brady
Tyra, John L.
Van der Wal, Jeanne H.
Van Tosh, David J.
Varn, Robert M.
Vaughan, John D.
Vaughters, Ray B.
Vereen, W.C., Jr.
Vernier, Elmon L., Jr.
Vines, Dr. & Mrs. H. Max
Voyles, William F.
Waddell, Byron
Wagner, D.W.
Wagner, Paul J.
Walker, Joe Whit
Walthall, Harvey E.
Ward, Charles L., Jr.
Ward, Ken
Waugh, Robert L.
Weinstein, Milton
Wegmauer, John H., Jr.
Wells, Thomas B.
Wentz, A.B.
Westgate, Reland B.
Westpoint Pepperell Employees PAC
Whaley, William H.
White, Milton J.
White, Dr. & Mrs. Perry Merrill
White, Wendell F.
Whitehead, C.L.
Whitehead, Ellis
Whitehead, Richard Kramer, Jr.
Whitesell, James C.
Whitson, W.T.
Whiteway, Robert W.
Whitney, Lighorge Coleman
Wick, Warren, II
Wieland, John F.
Wier, Albert W.
Wilkerson, James M.
Williams, B. Wilmont
Williams, Charles C.
Williams, Claude, Jr.
Williams, David Adam, MD
Williams, John A.
Williams, John L.
Williams, Regina W.
Willingham, Ras
Wilson, J. Miles H.
Wingfield, Chandler R.
Wise, Statcil D.
Woolfk, Albert G.
Wood, Harold A., Sr.
Woodruff, J. Barnes
Woodham, J. Trevor, MD
Woody, Mrs. Emylu T.
Workman, Charles C., Jr.
Wrenn, Paul L.
Wright, Henry T.
Wuck, Edward J.
Wyatt, Dion
Wyeth, Arthur R.
Yancey, Foster Vary, Sr.
Yantis, Paul L., Jr.
Young, Leonard L.
Young, Martha C.
Young, Willis C.
Yow, Camille W.
Zrejnicks, Andrejs
Zumpano, James J.

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Special Thanks to Our Volunteer Staff

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Linda Smith
Jack Vaughn

9 3 0 4 3 5 1 4 8 5 3

UGC 7126

PETER S. KNOX, JR.
THOMSON, GEORGIA 30824

404/595-2719 (OFFICE)
203 MAIN ST.

404/595-1907 (HOME)
ROUTE 3, BOX 312

July 25, 1990

90 JUL 30 PM 3:24

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

ATT: Jeffrey Long
Elizabeth Campbell

RE: MUR 2989

Gentlemen:

This responds to yours of July 20, 1990, regarding possible violation of 2 U.S.C. § 441(a)(1)(A) of the Federal Election Campaign Act of 1971.

90 JUL 31 PM 4:21

I can only plead ignorance and/or improper allocation of contribution by the "Friends of Mattingly".

I admit any liability I am due. I do not want to incur additional expense of retaining counsel. Under the circumstances I plead your consideration of the following:

1. Our objective was to encourage the development of a two party system in Georgia, to counterbalance the century old dominance of the Democratic Party, many of whose members in Georgia, philosophically, are as conservative, or more so, than the typical Republican nationwide.

2. Business-wise we operate as a family partnership, Knox LTD., with my two sons, Peter Knox, III and Boone A. Knox and myself as the general partners. In addition there are twenty or more family member limited partners, consisting of spouses, children, grandchildren, and now great grandchildren (increasing annually). My wife, Mary A. Knox and I act in unison, file joint tax returns, etc. In net effect my contribution was in behalf of all the family, of which I am the senior member.

If you will give consideration to these factors the amount contributed will break down to only $400 per person, for the four couples, - our two sons, daughter, their spouses, wife, and I. I could easily and justifiedly have allocated the contribution in this manner. Similarly Mr. Mattingly or his "friends", knowing better than I of the limitation, could have alerted me to possible consquences and could have reported the contribution, allocated as above.

If you can't or won't consider these circumstances along with

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my intent to "do good", for the body politic with no personal or family favor or benefit sought, just let me know my penalty for ignorance and/or misapplication.

Very truly yours,

Peter S. Knox,Jr.

PSKJr:pm

Sworn to and subscribed in my presence this 27th day of July 1990.

Nancy C. Thompson
Notary Public
Warren Georgia
My commission expires 6/12/91

9304351148555

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 31, 1990

Colleen C. McAndrews
Simmons & McAndrews
Attorneys and Counselors at Law
1441 Fourth Street
Santa Monica, California 90401

RE: MUR 2989

Dear Ms. McAndrews:

This is in response to your letter dated July 27, 1990, which we received on July 30, 1990, requesting an extension to respond to MUR 2989. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on August 27, 1990.

If you have any questions, please contact Jeff Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

2304351148856

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 1, 1990

John E. DeWald
Assistant General Counsel
Law Department
The Prudential Insurance Company of America
751 Broad Street
Newark, N.J. 07102-3777

RE: MUR 2989
Prudential Insurance Company
of America Federal PAC and
Milan E. Johnson, as treasurer

Dear Mr. DeWald:

This is in response to your letter dated July 31, 1990, which we received on July 31, 1990, requesting an extension of 20 days until August 24, 1990 to respond. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on August 24, 1990.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

2304351485 7

OGC 7136
RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG -1 AM 11:49

TEXTRON

Textron Inc.

40 Westminster Street
Providence, R.I. 02903
401/421-2800

July 27, 1990

VIA TELECOPIER
202-376-5280

90 AUG -1 PM 12:21
FEDERAL ELECTION COMMISSION
RECEIVED
OFFICE OF GENERAL COUNSEL

2304351485 8

Federal Election Commission
999 E. Street N.W.
Washington, DC 20463
Attention: Elizabeth Campbell

RE: MUR 2989

Textron Inc. PAC and Gary E.
Atwell as Treasurer

I am responding on behalf of both Textron Inc. Political Action Committee and Gary E. Atwell as Treasurer, to your letter of July 10, 1990, received July 13, 1990, concerning the above. Textron Inc. Political Action Committee admits that during the period September 29, 1983 through June 3, 1986 it made contributions to Friends of Mattingly Committee, for Mack Mattingly, a candidate for the U.S. Senate, in the total amount of $8,500. These contributions were mistakenly all designated as being for the general election.

This designation was a clerical mistake which escaped our attention. It was the intent of the Textron Inc. Political Action Committee to contribute $5,000 to Mr. Mattingly's primary election campaign, and to contribute $3,500 to his general election campaign. We would be pleased to submit amendments to the reports of the contributions to Mr. Mattingly, reflecting that correction.

Accordingly, the Textron Inc. Political Action Committee and Gary E. Atwell request pre-probable cause conciliation, and a finding that the clerical error explained above does not represent a violation of 2 U.S.C. §441a(a). This request shall not constitute a waiver of any legal defenses which may otherwise be available.

A987/FTLK.DLY

TEXTRON

Please advise us if there is any further information you would like us to provide.

Very truly yours,

Thomas L. Kraig, Jr.
Group Counsel

9304335148559

A987/FTLK.DLY

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Thomas L. Kraig, Jr.

ADDRESS: Textron Inc.
40 Westminster Street
Providence, R.I. 02903

TELEPHONE: 401-457-2401

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.

TEXTRON INC. POLITICAL ACTION COMMITTEE

July 27, 1990
Date

By: Eugene E. Daignault
Signature
Assistant Treasurer

RESPONDENT'S NAME: Textron Inc. Political Action Committee

ADDRESS: 40 Westminster Street
Providence, RI 02903

HOME PHONE:

BUSINESS PHONE: 401-421-2800

2304351486O

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Thomas L. Kraig, Jr.

ADDRESS: Textron Inc.
40 Westminster Street
Providence, R.I. 02903

TELEPHONE: (401)457-2401

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.

July 31, 1990
Date

Gary Atwell
Signature

RESPONDENT'S NAME: Gary E. Atwell

ADDRESS: 133 Indian Cave Road
Ridgefield, CT 06877

HOME PHONE:

BUSINESS PHONE: (401)457-2480

2930435148861

0GC7143

Lloyd H. Darby, III, D.D.S.
310 Jackson Street
Vidalia, GA 30474

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG -1 PM 4:10

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG -1 PM 1:21

July 26, 1990

Mr. John W. McGarry, Vice Chairman
Federal Election Commission
Washington, D.C. 20463

Sir:

I received your letter (RE: MUR 2989) dated July 20, yesterday, notifying me that you have reason to believe I violated the Federal Election Campaign Act of 1971. This is my response as requested:

The contribution referred to of 3/13/86 was to be equally divided between the Primary and the General Election and was to be attributed half to my wife, Loretta W. Darby, and half to myself, Lloyd H. Darby, III. This was so affirmed at the time of the contribution.

This fact was reaffirmed when the campaign committee requested me to do so in 1988. I believe this was in response to your previous inquiry.

I now reaffirm for, I hope, the last time that the contribution to Friends of Mattingly made by my wife and I on 3/13/86 was to be equally divided between the Primary and General Election efforts, and was to be attributed half to her and half to me.

This means--to use the figures you report in your Factual and Legal Analysis--that $824.57 should be attributed to my wife for the Primary and $824.57 should be attributed to her for the General Election. Similarly, those same figures should be attributed to me for both Primary and General Election.

As you can see, neither my wife nor I exceeded the legal limit for a campaign contribution to Senator Mattingly's 1986 election effort

Sincerely,

Lloyd H. Darby, III

9304351486 2

OGC 7142

DEWEY, BALLANTINE, BUSHBY, PALMER & WOOD
1775 PENNSYLVANIA AVENUE, N.W.
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LOS ANGELES, CALIFORNIA 90071
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TELECOPIER: (213) 625-0562

5355 TOWN CENTER ROAD
BOCA RATON, FLORIDA 33486
TELEPHONE: (407) 391-8399
TELECOPIER: (407) 391-8798

July 31, 1990

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

Attn: Elizabeth Campbell, Esq.

Re: MUR 2989
A.L. Williams & Associates PAC
and Jack Smith as treasurer

90 AUG -1 PM 1:02
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

2300435148863

Dear Mr. Noble:

This letter and the enclosures hereto, including the affidavits of Jack Smith, Kevin King and Barbara King, constitute the Response of A.L. Williams & Associates PAC ("ALW PAC") and Jack Smith as treasurer ("Respondents") to the Notification Letter dated July 10, 1990, from Federal Election Commission ("FEC" or "Commission") Chairman Lee Ann Elliott, informing them that the Commission had found reason to believe that they had violated 2 U.S.C. § 441a(a), a provision of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431 et seq. (1983) ("the Act"). The Factual and Legal Analysis which formed the basis for the Commission's finding was enclosed with this letter.

Chairman Elliott's letter further stated that the Respondents would have an opportunity to demonstrate that no action should be taken against them in this Matter Under Review ("MUR") 2989. For the reasons set forth herein, we urge that no action be taken against these Respondents.

I. Facts - The Relevant Portion of the Factual and Legal Analysis Appears to Be In Error

The Commission's analysis is based on 2 U.S.C. § 441a(a) which provides in relevant part that:

> "(2) No multicandidate political committee shall make contributions --
> . . .
> " (A) To any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed $5,000."

2 U.S.C. § 441a(a)(2)(A) (1983). The Factual and Legal Analysis states in relevant part:

> "A review of the reports filed by the Friends of Mattingly [Committee] reveals that A.L. Williams & Associates PAC made excessive contributions totaling $5,000 in connection with the 1986 Primary Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate." (Emphasis added.)

This statement appears to be incorrect. The Friends of Mattingly Committee ("the Mattingly Committee") did not report receiving any contributions from ALW PAC for the primary election in 1986. Instead, the Mattingly Committee reported receiving two checks from ALW PAC totaling $10,000 for the general election campaign; one check for $5,000 on October 28, 1986, and one check for $5,000 on November 1, 1986. Attached at TAB A is a copy of the

9304351486 4

page where these contributions were reported on Schedule A of the Thirtieth Day Report filed by the Mattingly Committee following the General Election on November 4, 1986, and covering the period October 16, 1986, through November 24, 1986. Therefore, the statement from the Legal and Factual Analysis quoted above may include a typographical error, and the word, "primary," was perhaps meant to read, "general." Substituting the word "general" for "primary" in the fourth line in the sentence quoted above would make the statement consistent with the Report of the Mattingly Committee.

Of course, the Mattingly Committee Report itself was in error when it indicated that ALW PAC had contributed $10,000 to the Committee's general election campaign account. ALW PAC contributed $5,000 to the Mattingly Committee for the primary election campaign, and $5,000 for the general election campaign. Each contribution was designated in writing on the face of the check: one for the primary and one for the general election. Attached at TAB B are copies of the checks. These were the only contributions ALW PAC made to the Mattingly Committee. Affidavit of Jack Smith, at ¶ 2. Thus, only one contribution, totaling $5,000, was made by the ALW PAC to the Mattingly Committee for the 1986 Georgia Republican primary election. This single contribution did not exceed the $5,000 limit as set forth in 2 U.S.C. § 441a(a)(2)(A). See also, 11 C.F.R. § 110.2(b)(1) (1990).

2304351486 5

II. ALW PAC Does Not Know Whether its Contribution Exceeded the Mattingly Committee's Debts Outstanding from the Primary Election Campaign

The only other possible explanation for the reference in the Factual and Legal Analysis to excessive contributions in connection with the "primary" election would be if the Mattingly Committee had no debts outstanding from the primary election. The ALW PAC contribution to the Mattingly Committee's primary account was made after the primary election had taken place. The Commission has by regulation provided that:

> "A contribution designated in writing for a particular election, but made after that election, shall be made only to the extent that the contribution does not exceed net debts outstanding from such election."

11 C.F.R. § 110.2(b)(3)(i) (1990). Respondents herein have not been informed by the Commission or by the Mattingly Committee that the Mattingly Committee had no net debts outstanding from its 1986 Georgia Republican primary election campaign, or that this contribution exceeded the Mattingly Committee's net debts outstanding from the primary election by $5,000.

In fact, the ALW PAC contribution to the Mattingly Committee for the primary election was made only after Robert (Bob) Mason, the Finance Director and an authorized representative of the Mattingly Committee, told Kevin S. King that the Mattingly Committee did, in fact, have net debts outstanding from the primary election. Affidavit of Kevin King, at ¶¶ 2, 4. ALW PAC reasonably relied on these representations. A candidate's

2304351486 6

authorized political committee is responsible for periodically calculating the amount of its net debts outstanding:

> "The treasurer of the candidate's authorized political committee shall calculate net debts outstanding in accordance with 11 C.F.R. 110.1(b)(3)(ii). The amount of the net debts outstanding shall be adjusted as additional funds are received and expenditures are made."

11 C.F.R. § 110.2(b)(3)(ii) (1990). (Emphasis added.) If a candidate's authorized political committee receives a contribution after an election which has been designated for that election but which exceeds the net debts outstanding from that election, the committee must either refund the contribution or obtain a written redesignation from the contributor. 11 C.F.R. § 110.2(b)(3)(1990). This was the responsibility of the Mattingly Committee. If the Mattingly Committee had no net debts outstanding after the primary campaign, but nonetheless continued to solicit and accept contributions for the primary campaign, it failed to comply with 11 C.F.R. § 110.2(b)(3) (1990).

2304351-48867

III. The Mattingly Committee Failed to Refund the Contribution to the ALW PAC or Seek a Redesignation of the Contribution

Where, as here, a contribution designated for a primary election campaign and received after the primary election does not exceed the $5,000 contribution limit for a primary election campaign, only the recipient political committee is in a position to know whether the contribution exceeds the committee's

net debts outstanding from the primary campaign.1/ Therefore, the Commission has properly placed the responsibility of compliance with 11 C.F.R. § 110.2(b)(3) on the recipient political committee. The Commission's regulations are clear:

> "To the extent that such contribution exceeds net debts outstanding, the candidate or the candidate's authorized political committee shall return or deposit the contribution within ten days from the date of the treasurer's receipt of the contribution as provided by 11 CFR 103.3(a) and if deposited, then within sixty days from the date of the treasurer's receipt the treasurer [of the candidate's authorized political committee] shall take the following action, as appropriate:
>
> "(A) Refund the contribution using a committee check or draft; or
>
> "(B) Obtain a written redesignation by the contributor for another election in accordance with 11 CFR 110.2(b)(5)."

11 C.F.R. § 110.2(b)(3) (1990). (Emphasis added.)

Respondents have never been told that the ALW PAC contribution to the Mattingly Committee designated for the 1986 Georgia primary election exceeded the Mattingly Committee's net debts outstanding from that election. The General Counsel's Factual and Legal Analysis does not claim that it did. The Mattingly Committee has not refunded the contribution to ALW PAC, or obtained a written redesignation of the contribution.

1/ This is to be distinguished from the case where a contributor makes a contribution to a political committee that, on its face, exceeds $5,000. In that case, both the contributor and the recipient are equally able to determine that the contribution is in violation of the statute, 2 U.S.C. § 441a(a)(2)(A).

2304351486 8

IV. Conclusion

To the best of their knowledge, Respondents did not make an excessive contribution to the Mattingly Committee for the 1986 primary or general election campaign in Georgia. Accordingly, we request that the General Counsel recommend to the Commission that no action be taken against these Respondents in this Matter Under Review.

Respectfully submitted,

Myles V. Lynk

Myles V. Lynk

Enclosures

2304351-48869

SCHEDULE A — ITEMIZED RECEIPTS — PAGE

Friends of Mattingly for 1986 — Period: 10/16/86 - 11/24/

A. L. Williams & Associates PAC 3483 Satellite Boulevard, Suite 210 Duluth, GA 30136 Receipt for: GENERAL	AGGREGATE YTD: *********	10/28/86 11/01/86	$5,000. $5,000.
AART PAC 1720 Regal Row, Suite 112 Dallas, TX 75235 Receipt for: GENERAL	AGGREGATE YTD: $500.00	11/01/86	$500.0
AICPA Effective Legislation Committee 1620 Eye Street, NW Washington, DC 20006 Receipt for: GENERAL	AGGREGATE YTD: $5,000.00	10/31/86	$3,000.0
Allegheny International Comm. for Effective Gov't. Two Oliver Plaza, Post Office Box 456 Pittsburg, PA 15230 Receipt for: GENERAL	AGGREGATE YTD: $1,000.00	10/24/86	$1,000.00
Allied-Signal PAC 1001 Pennsylvania Avenue, NW, Suite 700 Washington, DC 20004 Receipt for: GENERAL	AGGREGATE YTD: $1,000.00	10/24/86	$1,000.00
Allstate Insurance Company PAC Allstate Plaza Northbrook, IL 60062 Receipt for: GENERAL	AGGREGATE YTD: $1,000.00	10/23/86	$1,000.00
American Chiropratic Association PAC 1916 Wilson Boulevard Arlington, VA 22201 Receipt for: GENERAL	AGGREGATE YTD: $1,000.00	10/23/86	$1,000.00
American Collectors Association PAC 4040 West 70th Street Minneapolis, MN 55435 Receipt for: GENERAL	AGGREGATE YTD: $500.00	11/04/86	$500.00
American Electronics Association PAC 2680 Hanover Street Palo Alto, CA 94304 Receipt for: GENERAL	AGGREGATE YTD: $500.00	10/24/86	$500.00

SUBTOTAL of Receipts [illegible] $00.00

(B)

Personally picked up by Kevin King
10/31/86

COPY

A. L. WILLIAMS & ASSOCIATES
P.A.C., INC.
3483 SATELLITE BLVD. STE. 210
DULUTH, GEORGIA 30136

1008

October 31 19 86

64-327
611

PAY TO THE ORDER OF Friends of Mattingly ---------- $ 5000.00

Five thousand and no/100ths---------- DOLLARS

THE BRAND BANKING COMPANY
MEMBER FEDERAL RESERVE SYSTEM
SNELLVILLE, GA.

FOR Primary

⑆061103276⑆ 10 40 278" 1008

A. L. WILLIAMS & ASSOCIATES
P.A.C., INC.
3483 SATELLITE BLVD. STE. 210
DULUTH, GEORGIA 30136

1009

October 31 19 86

64-327
611

PAY TO THE ORDER OF Friends of Mattingly $ 5000.00

Five thousand and no/100ths---------- DOLLARS

THE BRAND BANKING COMPANY
MEMBER FEDERAL RESERVE SYSTEM
SNELLVILLE, GA.

FOR General Election

⑆061103276⑆ 10 40 278" 1009

930435148711

BEFORE THE FEDERAL ELECTION COMMISSION, WASHINGTON, D.C.

STATE OF GEORGIA)
)ss.
COUNTY OF GWINNETT) IN RE: MUR 2989

AFFIDAVIT OF KEVIN S. KING

Now comes your deponent who, being duly sworn, deposes and says:

1.

My name is Kevin S. King and I reside at 590 Widgeon Lane, Atlanta, Georgia. I am and was in 1986 Vice President and General Counsel of Management Financial Services, Inc., formerly named A. L. Williams & Associates, Inc.

2.

To the best of my recollection, in approximately or just before September of 1986, I had a discussion with Bob Mason, Finance Director of the Friends of Mattingly Committee ("Mattingly Committee"), concerning the purchase of $2500 tickets by pairs of contributors to the October 8, 1986 rally at the Omni in Atlanta, Georgia that was sponsored by the Georgia Republican Party for the Mattingly Committee and others. During that conversation, Bob Mason told me that the Mattingly Committee had outstanding debts from the primary election campaign.

3.

In late October of 1986, a Mattingly Committee official who, to the best of my recollection, was Bob Mason, asked me for a

9304351487 2

contribution from the A. L. Williams & Associates Political Committee ("ALWPAC") to the Mattingly Committee.

4.

It was my firm understanding in late October 1986 that the Mattingly Committee had outstanding primary debts. This understanding was based on my conversations with Bob Mason and other officials of the Mattingly Committee.

5.

I was aware of the $5,000 per election limit on contributions from multicandiate committees such as ALWPAC to political committees such as the Mattingly Committee. I therefore asked Jack Smith, Treasurer of ALWPAC, to make a $5000 ALWPAC contribution to the Mattingly Committee for the primary election and a $5000 ALWPAC contribution to the Mattingly Committee for the general election. It was my understanding that these contributions were permitted by law.

6.

I was never informed by any Mattingly Committee official that these contributions were excessive or otherwise improper.

Further your deponent sayeth not.

Kevin S. King

Subscribed and sworn to before me
on this 30th day of July, 1990.

Brenda G. Morgan
Notary Public

My Commission expires: Notary Public, Gwinnett County, Georgia
My Commission Expires Nov. 23, 1990

9304351487 3

BEFORE THE FEDERAL ELECTION COMMISSION, WASHINGTON, D.C.

STATE OF GEORGIA)
)ss.
COUNTY OF GWINNETT) IN RE: MUR 2989

AFFIDAVIT OF BARBARA T. KING

Now comes your deponent who, being duly sworn, deposes and says:

1.

My name is Barbara T. King and I reside at 1819 Kanawha Trail, Stone Mountain, Georgia. I was on the Board of Directors of A. L. Williams & Associates, Inc. in 1986. I am now a consultant to the A. L. Williams Corporation.

2.

I understand that Jack Smith thinks he may have had a conversation with me in 1986 concerning contributions to be made by the A. L. Williams & Associates Political Action Committee ("ALWPAC") to the Friends of Mattingly Committee ("Mattingly Committee").

3.

To the best of my recollection, I did not have any discussions with Jack Smith concerning contributions to be made by ALWPAC to the Mattingly Committee. To the best of my recollection, I did not have any involvement with the affairs of ALWPAC.

2304351487 4

Further your deponent sayeth not.

Barbara T. King

Barbara T. King

Subscribed and sworn to before me
on this 30th day of July, 1990.

Brenda G. Morgan

Notary Public

Notary Public, Gwinnett County, Georgia
My Commission Expires Nov. 23, 1990

My Commission expires: _____

P 3004351 4875

BEFORE THE FEDERAL ELECTION COMMISSION, WASHINGTON, D.C.

STATE OF GEORGIA)
)ss.
COUNTY OF GWINNETT) IN RE: MUR 2989

AFFIDAVIT OF JACK SMITH

Now comes your deponent who, being duly sworn, deposes and says:

1.

My name is Jack Smith and I reside at 1658 Temple Johnson Road, Loganville, Georgia. I am now and was in 1986 Executive Vice President and Treasurer of Management Financial Services, Inc., formerly named A. L. Williams & Associates, Inc. I was treasurer of the A. L. Williams & Associates Political Action Committee ("ALWPAC") until this separate segregated fund was terminated.

2.

Attached to this Affidavit are copies of two ALWPAC contribution checks signed by me, each dated October 31, 1986 and payable to Friends of Mattingly. One check is designated in writing on its face for "Primary" and the other check is designated in writing on its face for "General Election." These were the only contributions that ALWPAC made to the Mattingly Committee.

9304351487 6

I do not now recall, almost four years after these checks were issued, many of the specific details surrounding their issuance. To the best of my recollection, these contributions were made at Kevin King's request. I think that I may have had a discussion with Kevin King and Barbara King regarding the contributions, and specifically the primary contribution check, but I do not recall the substance of that discussion or with whom I had it. To the best of my recollection, I relied on Kevin King to determine whether the contributions that ALWPAC was asked by political committees to make were permissible.

4.

After the above mentioned contributions were made, the Mattingly Committee never contacted me nor, to the best of my knowledge, anyone else associated with A. L. Williams & Associates, Inc. or ALWPAC concerning the contributions, never informed me that the contribution for the primary election exceeded the Mattingly Committee's net debts outstanding from that campaign, and never returned or attempted to return either or both of the contributions.

Further your deponent sayeth not.

Jack Smith

Subscribed and sworn to before me
on this 30th day of July, 1990.

Notary Public

My Commission expires: Notary Public, Gwinnett County, Georgia
My Commission Expires Nov. 23, 1990

2304351-48877

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Myles V. Lynk, Esq.
Gerald M. Rosberg, Esq.
Andrew W. Kentz, Esq.

ADDRESS: Dewey, Ballantine
1775 Pennsylvania Avenue, NW
Washington, D.C. 20006

TELEPHONE: (202) 862-1086

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.

July 30, 1990
Date

Signature

RESPONDENT'S NAME: A.L. Williams & Associates PAC
and Jack Smith, as Treasurer

ADDRESS: 3483 Satellite Boulevard, Suite 210
Duluth, GA 30136

HOME PHONE:

BUSINESS PHONE: (404) 476-5837

2304351487 8

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Nancy Wiggins-Lester, Esq.

ADDRESS: 3100 Breckinridge Boulevard
Building 1200
Duluth, Georgia 30316

TELEPHONE: (404) 564-6119

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.

July 30, 1990
Date

Signature

RESPONDENT'S NAME: A.L. Williams & Associates PAC
and Jack Smith, as Treasurer

ADDRESS: 3483 Satellite Boulevard, Suite 210
Duluth, GA 30136

HOME PHONE:

BUSINESS PHONE: (404) 476-5837

9304351487879

00L7156

Cook and Company

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG -2 AM 10:55

HAZLEHURST, GEORGIA 31539

P.O. BOX 806

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG -2 AM 11:51

July 28,1990

Mr. Jeffery Long
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2989
Cook and Company

Dear Mr. Long:

This will acknowledge your letter of July 20,1990 and confirm our phone conversation of July 25,1990.

Cook and Company is a family owned partnership (not incorporated) owned by myself and my three children, C.P. Cook, Jr. age 47, Saralyn Cook Sears age 45, and Carolyn Cook Trowell age 43. I am 73 years old and managing partner of Cook and Company since its creation in 1945. My children and I regularly withdraw funds from the partnership for personal use and other purposes.

We desired to obtain 6 tickets, at $1,000 each, for 6 couples to attend the VIP reception with the President prior to the main event (see enclosed). I contacted the Mattingly Atlanta Headquarters via phone and was told that three partners of our company could contribute $2,000 each to cover $1,000 for the Primary and $1,000 for the General Election or make the $2,000 gift on behalf of contributor and spouse. Attached is a copy of our checks and a letter of certification from our Bank dated July 26,1990. This was the extent and total of our contributions to Senator Mattingly's Campaign. If you have any further question, you may contact me at 912-375-2595 after August 20, 1990.

Sincerely,

Claude Cook

Claude P. Cook

23043514880

BANK OF HAZLEHURST
208 SOUTH TALLAHASSEE STREET
HAZLEHURST, GEORGIA 31539

July 26, 1990

Mr. Jeffery Long
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Long:

This letter is to certify that the enclosed photostatic copies are duplicates of the original checks issued by Cook & Company.

This certification follows physical inspection of the original checks.

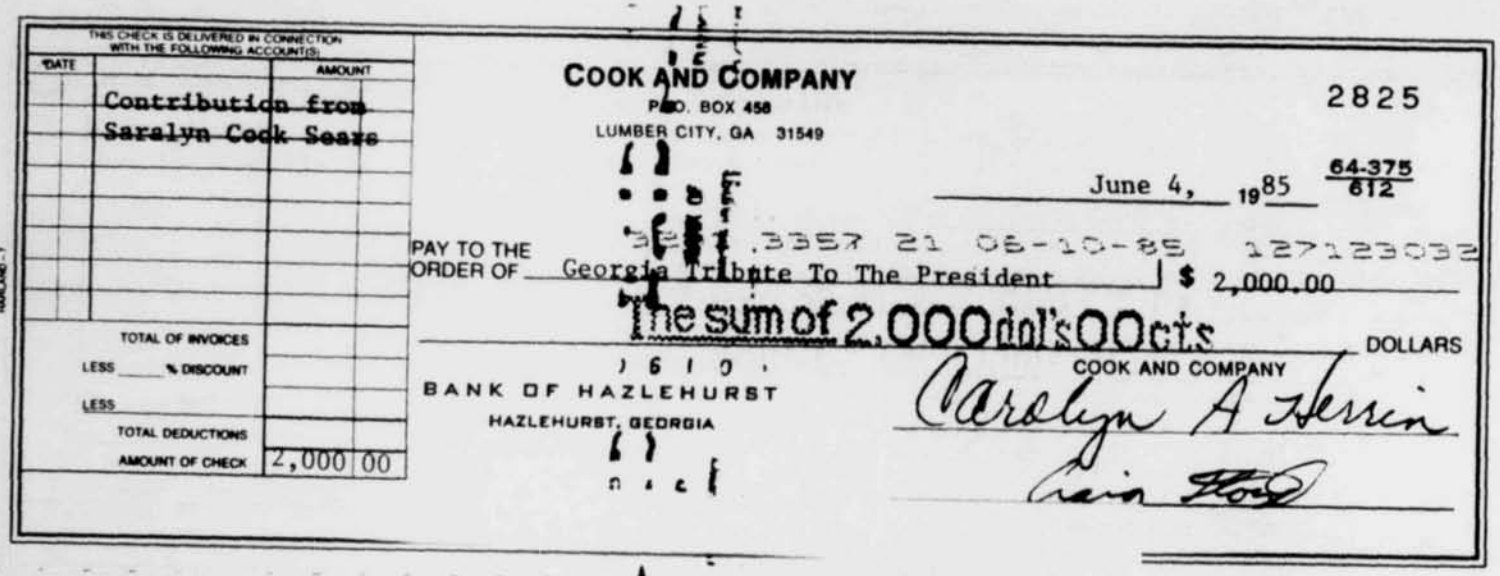
Sincerely yours,

W. Luther Taylor
President

Enclosures

WLT:nhr

23043514881



THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT(S):

DATE		AMOUNT
	Contribution from Saralyn Cook Sears	
	TOTAL OF INVOICES	
	LESS ____ % DISCOUNT	
	LESS	
	TOTAL DEDUCTIONS	
	AMOUNT OF CHECK	2,000 00

COOK AND COMPANY
P.O. BOX 458
LUMBER CITY, GA 31549

2825

June 4, 1985

64-375
612

.3357 21 05-10-85 127123032

PAY TO THE ORDER OF Georgia Tribute To The President $ 2,000.00

The sum of 2,000 dol's 00 cts DOLLARS

0610

BANK OF HAZLEHURST
HAZLEHURST, GEORGIA

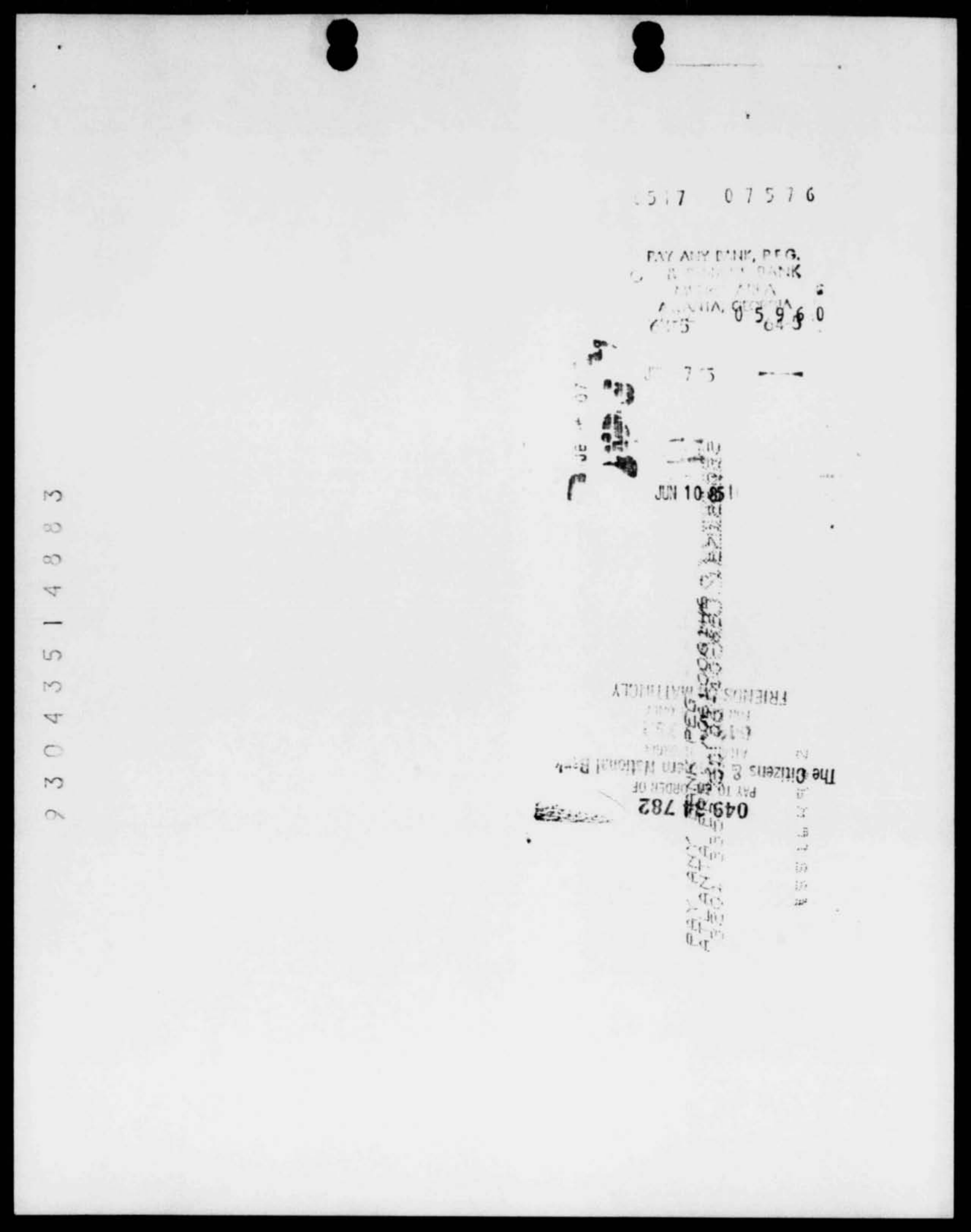
COOK AND COMPANY

Carolyn A Herrin

Lain Flood

HARLAND-7

930435148 82


0517 07576
PAY ANY BANK, ETC.
JUN 10 61
FRIENDS OF MARTINDALE
The Citizens & Southern National Bank
PAY TO THE ORDER OF
049-54 782
9 3 0 4 3 5 1 4 8 8 3

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT(S)

DATE		AMOUNT
	Contribution from Carolyn Cook Trowell	
	TOTAL OF INVOICES	
	LESS ____ % DISCOUNT	
	LESS	
	TOTAL DEDUCTIONS	
	AMOUNT OF CHECK	2,000 00

HARLAND - 7

COOK AND COMPANY
P. O. BOX 458
LUMBER CITY, GA 31549

2823

0 3 1 0

64-375
612

June 4, 19 85

3201 3357 21 08-10-85 12712303

PAY TO THE ORDER OF Georgia Tribute To The President $ 2,000.00

The sum of 2,000 dol's 00 cts DOLLARS

BANK OF HAZLEHURST
HAZLEHURST, GEORGIA

COOK AND COMPANY
Carolyn A Herrin
Claude P Cook

THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT(S)

DATE		AMOUNT
	Contribution from Claude P. Cook	
	TOTAL OF INVOICES	
	LESS ____ % DISCOUNT	
	LESS	
	TOTAL DEDUCTIONS	
	AMOUNT OF CHECK	2,000 00

HARLAND - 7

0 6 1 0

COOK AND COMPANY
P. O. BOX 458,
LUMBER CITY, GA 31549

2824

64-375
612

June 4, 19 85

3201 3357 21 08-10-85 12712303

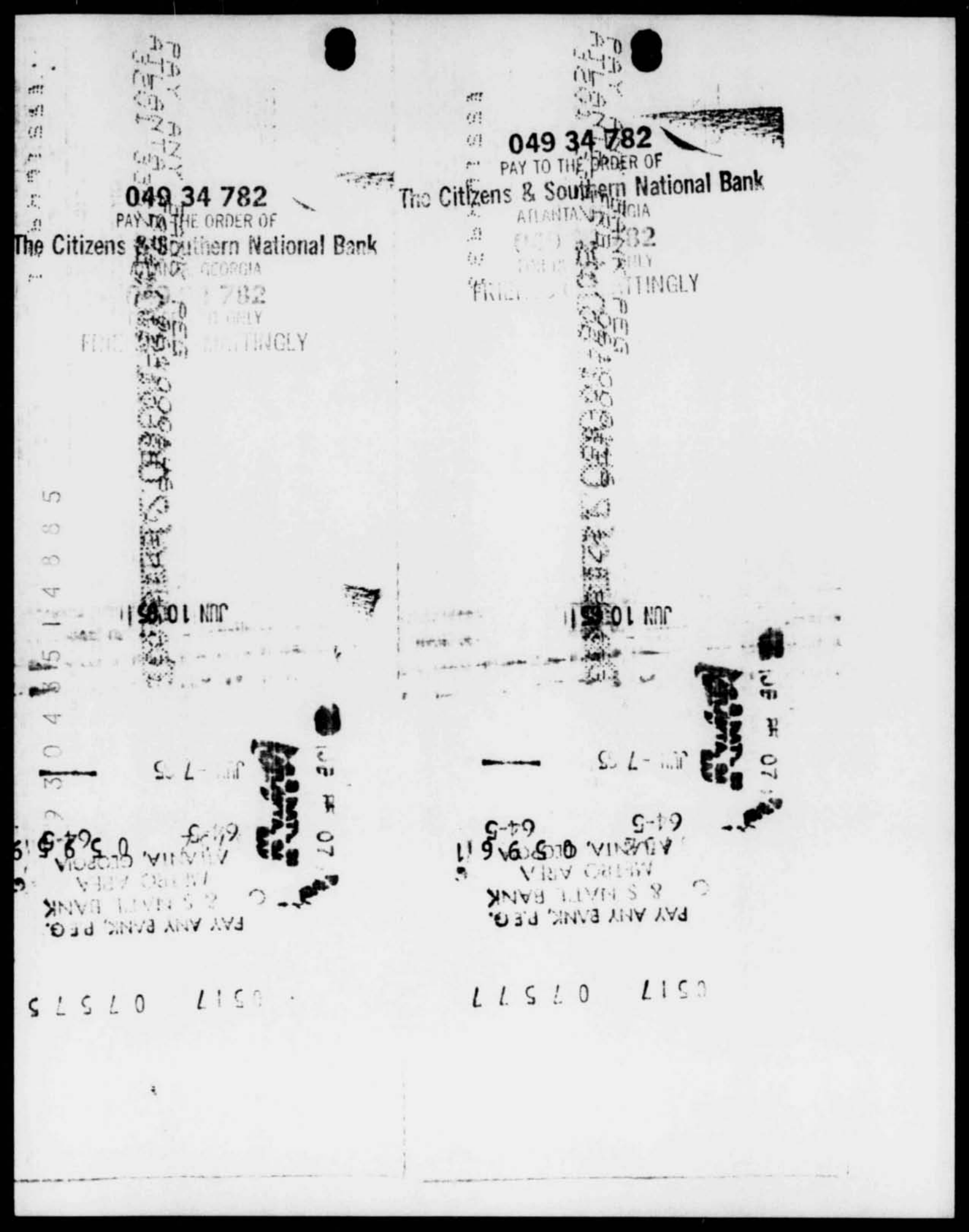
PAY TO THE ORDER OF Georgia Tribute To The President $ 2,000.00

The sum of 2,000 dol's 00 cts DOLLARS

BANK OF HAZLEHURST
HAZLEHURST, GEORGIA

COOK AND COMPANY
Claude P. Cook
Carolyn A Herrin

930435148 84


049 34 782
PAY TO THE ORDER OF
The Citizens & Southern National Bank
049 34 782
PAY TO THE ORDER OF
The Citizens & Southern National Bank

06C7163

John E. D[illegible]ld, CLU, FLMI
Assistant General Counsel
Law Department

The Prudential Insurance Company of America
751 Broad Street, Newark, NJ 07102-3777
201 802-8940 Fax: 201 802-8180

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG -2 AM 11:54

July 31, 1990

VIA: FACSIMILE

CONFIRMATION COPY TO FOLLOW

FEDERAL ELECTION COMMISSION
90 AUG -2 PM 4:21

Hon. Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.c. 20463

ATTN: ELIZABETH CAMPBELL
JEFFREY LONG

Re: **MUR 2989**
THE PRUDENTIAL INSURANCE COMPANY OF AMERICA
FEDERAL PAC AND MILAN E. JOHNSON AS TREASURER

Dear Chairman Elliott:

This letter will formally confirm, in writing, my telephone request to Jeffrey Long for an extension of 20 days within which to reply to your letter of July 10, 1990 addressed to Milan E. Johnson on the referenced matter which by its terms requested submission of materials within 15 days of his receipt of that letter, which occurred on July 20, 1990.

In investigating our files to form a substantive response as indicated in my acknowledgement letter of July 23, 1990, it has developed that certain files are apparently stored off site and will require several days to access and search.

Also, since the activities referred to in your letter appear to go back several years, it is developing that we are experiencing difficulty in locating other records on site as well.

Since it appears by my computation that your request for a response within 15 days of receipt would have required a reply by August 6 as the first business day after Saturday, August 4, please accept this letter as my formal request for an extension of response time to 20 days from August 4 or Friday, August 24, 1990.

Thank you very much for your consideration of this request.

If there are any questions or problems, please feel free to contact me promptly at this office.

9304351148886

Thank you very much.

Very truly yours,

John E. DeWald
Assistant General Counsel

JED/vdm
Info. cc: Milan E. Johnson
Executive V.P.

Richard E. Meade, Esq.
V.P. & Assistant General Counsel

2304351488887

ThePrudential

John E. DeWald, CLU, FLMI
Assistant General Counsel
Law Department

The Prudential Insurance Company of America
751 Broad Street, Newark, NJ 07102-3777
201 802-8940 Fax 201 802-8180

July 23, 1990

VIA: FACSIMILE

Hon. Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.C. 20463

ATTENTION: Elizabeth Campbell
and Jeffrey Long

Re: **MUR 2989**
THE PRUDENTIAL INSURANCE COMPANY OF AMERICA
FEDERAL PAC AND MILAN E. JOHNSON AS TREASURER

Dear Chairman Elliott:

This will acknowledge receipt of your letter dated July 10, 1990 and received July 20, 1990 on the referenced matter.

I enclose an executed Statement of Designation of Counsel.

Please be advised that I have been informed that the relevant files are being researched to respond to the findings asserted in your letter.

I will contact your office as soon as I have had the opportunity to review the results of this search.

In the meantime, please feel free to contact me if there are any further questions on this matter.

Thank you very much.

Very truly yours,

John E. DeWald
Assistant General Counsel

JED/vdm
Enclosure

2304351480 8

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: John E. DeWald, Esq.

ADDRESS: 751 Broad Street, 13-Plaza
Newark, NJ 07101-3777

TELEPHONE: (201) 802-8940

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.

7/24/90
Date

Signature

RESPONDENT'S NAME: The Prudential Insurance Company of America
Federal PAC, Milan E. Johnson, Treasurer

ADDRESS: 751 Broad Street, 3-Plaza
Newark, NJ 07101-3777

HOME PHONE:

BUSINESS PHONE: (201) 802-7129

2304351488 89

OOC 7158

HUNTER, MACLEAN, EXLEY & DUNN, P.C.

ATTORNEYS AT LAW

POST OFFICE BOX 9848

SAVANNAH, GEORGIA

31412-0048

(912) 236-0261

MALCOLM R. MACLEAN
WM. MALLIE EXLEY, JR.
H. MITCHELL DUNN, JR.
JOHN M. HEWSON, III
MARK M. SILVERS, JR.
ARNOLD C. YOUNG
W. BROOKS STILLWELL, III
F. SAUNDERS ALDRIDGE, III
ROBERT S. GLENN, JR.
LEE C. MUNDELL
ANDREW H. ERNST
ROLAND B. WILLIAMS
DON L. WATERS
LEONARD J. PANZITTA
MOLLY M. HOWARD
JONATHAN D. SPRAGUE
JOSEPH R. ROSS (GA & FL)
HAROLD B. YELLIN

WAYNE S. RACZ
WADE W. HERRING, II
THERESE F. PINDAR (GA & LA)
K. RUSSELL SIMPSON
THEODORE T. CARELLAS
ANNE C. MARSCHER (GA & SC)
FRANCES M. CASEY (GA & FL)
MARVIN A. FENTRESS
ELIZABETH F. THOMPSON
WILLIAM H. GODLOVE
DOUGLAS M. MULLER (GA & SC)
PATRICK J. CLARKE
R. JASON D'CRUZ
MICHELLE P. JORDAN
KIMBERLY M. HEMPEL (GA & PA)
KIRBY C. GOULD
DARRIN L. McCULLOUGH
RONNIE D. TALLEY (GA & SC)

NELL C. PILLARD
MARK W. NICKERSON
EDWIN W. KING, JR. (GA & SC)
DEBRA J. BROOK
COUNSEL

CABLE ADDRESS: ANCAN

TELEX: 54-6483

FAX: (912) 236-4936

MAIN OFFICES

200 EAST ST. JULIAN STREET
THIRD FLOOR
SAVANNAH, GEORGIA 31401

SOUTHSIDE OFFICES

SUITE 102
7393 HODGSON MEMORIAL DR.
SAVANNAH, GEORGIA 31406
FAX (912) 944-3777

July 30, 1990

90 AUG -2 AM 11:51

FEDERAL ELECTION COMMISSION

Ms. Elizabeth Campbell
Federal Election Commission
Washington, D. C. 20463

Re: MUR 2986
Andrew Gay Labrot

Dear Ms. Campbell:

In accordance with our prior conversation enclosed please find the Statement of Designation of counsel completed by Mr. Labrot designating me as his counsel. I trust this is in proper order.

As we discussed on the telephone the $2000.00 check dated May 15, 1985, was made payable o "Georgia Tribute to the President". As I stated to you on the telephone Mr. Labrot thought that this was a fund raising event for the Republican Party on through the national level in conjunction with the President. You were to determine whether or not this was in fact a fund raising event of the Mattingly campaign. I look forward to hearing from you.

Yours very truly,

John M. Hewson, III

JMH/ja

cc: Andrew Labrot

L:CAMPBE/JMH

90 AUG -2 AM 10:48

2304351-48820

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: John M. Hewson, III

ADDRESS: Hunter, Maclean, Exley & Dunn, P.C.
P. O. Box 9848
Savannah, Georgia 31412

TELEPHONE: (912) 236-0261

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.

July 26, 1990
Date

Andrew G. Labrot
Signature

RESPONDENT'S NAME: Andrew G. Labrot

ADDRESS: Timberlands Associates
P. O. Box 1666
Savannah, Georgia 31402

HOME PHONE:

BUSINESS PHONE: (912) 232-4820

2930435148911

90 AUG -3 AM 11:51

2002 RIVERMEADE DR.
ATLANTA, GEORGIA 30328

90 AUG -2 PM 4:43
RECEIVED
FEDERAL ELECTION COMMISSION

July 31, 1990

John W. McGarry
Vice Chairman
Federal Election Commission
Washington, DC 20463

RE: MUR 2989
John A. Conant

Dear Mr. McGarry:

This is in response to your letter of July 20, 1990 regarding campaign contributions by me in 1984 and 1985 to Mack Mattingly, a candidate for the U.S. Senate.

It was my understanding at the time the contributions were made that the limitation on individual contributions to Federal election campaigns was $1,000 per year. I, therefore, would not have realized that a 1984 contribution to Senator Mattingly should be considered when a gift was contemplated in 1985.

I was surprised to find that two $1,000 contributions were apparently made by me in 1985. I have reviewed my cancelled checks for that year and find that a contribution of $1,000 was made to the Friends of Mattingly Campaign Committee on April 8, 1985 (Trust Company check #1216), and a $1,000 contribution to the Georgia Tribute to President Reagan on May 9, 1985 (Trust Company check #1227). The endorsement on the back of check #1227 shows that it was deposited to the Friends of Mattingly General Account. My memory is that the Georgia Tribute to President Reagan was a seated dinner for which I bought a table, and invited friends to join me. I think I assumed that it would benefit the Republican party of Georgia, and not Senator Mattingly exclusively, but five years after the event, I'm not sure what my understanding was at the time. However, I'm confident that I did not knowingly violate the campaign limitations as I understood them to be.

2300435148892

It does appear that I am in technical violation of the contribution limitations of the Federal Election Campaign Act of 1971, which I regret. I would like to settle the matter promptly, and I'll wait to hear from you as to what action I should take to accomplish this.

Sincerely yours,

John A. Conant

JAC:ggb

enclosure
copies of checks #1216, & #1227

9304351148933

JOHN A. CONANT
2902 RIVERMEADE DR. NW
ATLANTA, GA 30327

1216

64-10
610

PAY TO THE ORDER OF Friends of Mattingly Campaign Committee $1000.00

One thousand and no/100 DOLLARS

Trust Company Bank
Atlanta, Georgia

FOR Contribution

John A Conant

#1216

049 34 782
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GEORGIA
049 34 782
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY

PAID

64-10

JOHN A. CONANT
2902 RIVERMEADE DR. NW
ATLANTA, GA 30327

1227

64-10
610

PAY TO THE ORDER OF Georgia Republican Party Reagan $1000.00

One thousand and no/100 DOLLARS

Trust Company Bank
Atlanta, Georgia

FOR

John A Conant

#1227

079 35 109
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GA
079 35 109
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY
GENERAL ACCOUNT

PAID

93043514894

OGC 7166

FEDERAL ELECTION COMMISSION

90 AUG -3 AM 11:51

C. L. PATRICK
P. O. Box [redacted]
COLUMBUS, GEORGIA

July 30 1990,

90 AUG -2 PM 4:47

RECEIVED
FEDERAL ELECTION COMMISSION

Mr. John W. McGarry, Vice Chairman
Federal Election Commission
Washington, D. C. 20463

Dear Mr. McGarry:

Reference is made to your letter of July 20, 1990, regarding contributions to Sen. Mattingly.

Since this goes back from five to seven years, it took some searching to locate all of the data. Two of the checks had to be photocopied from the computer files at the bank.

The facts are these: In June of 1983 my wife and I gave $1,000 to Sen. Mattingly for his campaign (copy of check enclosed). In May of 1985, we were invited to a party for President Reagan in Atlanta which cost $1,000 per couple. I wrote three checks for this affair, each for $1,000 (copies enclosed). One was for Ray Crowley and one for his son-in-law, G. D. Patterson. On June 4, 1985, Mr. Crowley reimbursed me $2,000 which was deposited to my account (copy of deposit record enclosed).

I also designated my son, Michael W. Patrick, as a donor of the other $1,000 check, the authorization for which is enclosed.

Of course, we were told that the money for the tribute to the President would go to the Republican Party for the General Election as the Primary was almost non-contested.

I am enclosing the data as stated above. If you have any further questions, please communicate with me.

Sincerely,

CLP:jp
enc.

9304351489 5

ASSET MANAGEMENT ACCOUNT

CARL L. OR FRANCES PATRICK
2701 LYNDA LANE 561-7993
COLUMBUS, GA 31906

206

3201 3357 22 05-10-85 1275

June 3 1985 64-60 / 611

Pay to the Order of GEORGIA TRIBUTE TO THE PRESIDENT $ 1,000.00

ONE THOUSAND AND NO/100---------- Dollars

Columbus Bank and Trust Company
Columbus, Georgia

For C. D. Patterson

930431148896

ASSET MANAGEMENT ACCOUNT

203

CARL L. OR FRANCES PATRICK
2701 LYNDA LANE 561-7993
COLUMBUS, GA 31906

2487 2502 22 05-04-85 1280633

May 28 1985 64-60 / 611

Pay to the Order of Ga. Tribute to the President $ 1000.00

One Thousand and 00 Dollars

Columbus Bank and Trust Company
Columbus, Georgia

For Ray Crowley

150705050160

C. L. PATRICK
2701 LYNDA LANE
COLUMBUS, GEORGIA 31906

6682

May 23 1985 64-60 / 611

2487 2502 22 05-31-85 1302737

PAY TO THE ORDER OF Georgia Tribute to the President $ 1,000.00

One Thousand and 00 DOLLARS

CBT Columbus Bank and Trust Company • Columbus, Georgia
MEMBER FDIC

FOR

PATRICK
2701 LYNDA LANE
COLUMBUS, GEORGIA 31906

5929

64-60
611

June 1 19 83

PAY TO THE ORDER OF Mark Mattingly $ 1000

One thousand and no/100 DOLLARS

Columbus Bank and Trust Company • Columbus, Georgia
MEMBER FDIC

⑈335124⑈ 21 ⑆08-15-83⑆ ⑈3369578⑈

FOR 1984 Campaign

⑆230435148897

Friends of Mattingly

P.O. Box 1986 • Atlanta, Georgia 30301-1986

MACK MATTINGLY

C. L. Patrick
2701 Lynda Lane
Columbus, GA 31906

Dear Mr. Patrick:

Thank you for your contribution to the Friends of Mattingly campaign fund. The Federal Election Commission limits the amount that an individual may contribute to $1,000.00 for the Primary election and $1,000.00 for the General election. You have recetly exceeded the $2,000.00 limit and we would like for you to indicate below how you would like the excess contribution listed.

For your convenience, we have enclosed a stamped, self-addressed envelope.

Sincerely,

Donald P. Gammon
Campaign Treasurer

____ Please list the excess contribution in my spouses's name, which is: _____

__V__ Please list the excess contribution in the following name:

NAME: Michael Patrick

ADDRESS: Box 391 Columbus Ga 31994

EMPLOYER: Columbus Cardiology Inc

OCCUPATION: President

Paid for by Friends of Mattingly

23043514898

1985 BE SURE TO DEDUCT ANY PER ITEM CHARGES, SERVICE CHARGES, OR FEES THAT MAY APPLY

DATE	NUMBER	TRANSACTION DESCRIPTION	(+ OR −) OTHER	✓ T	(+) AMOUNT OF DEPOSIT	(−) AMOUNT OF PAYMENT OR WITHDRAWAL
6 3	207	Keystone Prov. Life Ins		✓		100,000 00
6 3		Fed. Tax Refund		✓	23,804 00	
6 4		Ray Crowley Reimbursmt.		✓	2,000 00	
6 10		Mo. Inc. Tax Refund		✓	4,976 00	
6 17		Parker & Parsley 942.39				
6 17		Cmd Dir. 950.00		✓	1,892 39	
6 19		Roy Railways 1978-A		✓	9,355 84	
7 1		Callaway Dem. Proceeds		✓	35,665 50	
5 31		Int. @ 7.30		✓	4,503 19	
7 3		Fd Pension 7286.49				
7 3		Tr. Co. of AA 2587.50		✓	9873 99	
7 3		Fd Div. 1400.00				
7 3		" " 97.00				
7 3		Sq. Oaks Prov. 12,150.00		✓	13,647 00	
7 5		Piece Woods (Int.)		✓	2,884 00	
7 1		Int. @ 7.15		✓	3,011 51	
7 22		Lanham & F 2,250.00				
7 23		AR-Lib. Bnt 7,072.66			9,322 66	
7 26		Keystone Prov. Life			100,000 00	
8 2		Fd Pension			7,286 49	
8 5		Dep. 4 Cks.			3,795 61	
8 1		Int. @ 6.95%			2,305 19	

REMEMBER TO RECORD ALL DEPOSITS AND WITHDRAWALS AS WELL AS PRE-AUTHORIZED TRANSA

9 3 0 4 3 5 1 4 8 9 9

OGC 7171

J. BARNETT WOODRUFF
P. O. Box 750
Columbus, Georgia 31902

July 31, 1990

Federal Election Commission
Washington, D. C.

re: MUR 2989
Emily Woodruff

Attn: Ms Elizabeth Campbell

Dear Ms. Campbell,

I just ran across the enclosed, and thought I would send. This is a letter reeeived from Friends of Mattingly in Dec. 1988 in which they stated Emily was $ 1050 over.

My two sons, Steve and J B, Jr agreed to have half each applied towards them. I never heard further. Attached to this letter from Mattingly is the social security number and occupation of my two sons - in case this is needed.

Sincerely,

J. Barnett Woodruff
Atty in Fact for Emily Woodruff

cc: Steve B. Woodruff
J B Woodruff, Jr.

2304335149900

FRIENDS OF MATTINGLY

December 7, 1988

Ms. Emily Woodruff
1941 Stark Avenue
Columbus, Georgia 31906

Dear Ms. Woodruff:

During the 1986 Senate Campaign we contacted you concerning your exceeding the contribution limitation. At that time you indicated how you wanted the excess contribution listed. Unfortunately, those records were misplaced and cannot be located in our storage warehouse. We would like to ask for your help again. Friends of Mattingly Committee is undergoing an audit by the Federal Election Commission. We ask that you re-affirm how you wanted your excess contribution of $ 1,050.00 listed. Would you please help us by indicating below to whom you would like the contribution listed, and have the person affirm this by signature.

We realize that this is an imposition on your time and memory; however, it would help us reconstructing these records for the audit.

Thanks very much,

Bill Stewart

Bill Stewart
For The Friends of Mattingly Committee

____Please list the contribution in my spouse's name:

SPOUSE'S NAME: NOT MARRIED

SPOUSE'S SIGNATURE: —

____Please list the contribution in the following name:

NAME: Stephen B. Woodruff & of B Woodruff Jr.

ADDRESS: P.O. Box 750 Pó Box 750

Columbus, GA 31902 Columbus, GA 31902

SIGNATURE: Emily Woodruff by of B Woodruff SR. POA.

EMPLOYER: —

OCCUPATION: Retired

P.O. BOX 1986 • ATLANTA, GEORGIA 30301-1986 • (404) 352-1986

PAID FOR BY FRIENDS OF MATTINGLY

93043514901

OOC 7174

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 AUG -3 AM 10: 26

HAND DELIVERED

MUR 2989

90 AUG -3 AM 11: 53

July 31, 1990

Dear Sirs,

In reference to your letter of July 20, 1990, I am happy to provide you with the following information.

I was told by the Mattingly campaign that I could donate $1000.00 for the primary election and designate these donations from each member of my immediate family. At the time of these donations, I designated one donation from me, one from Joan Towery, and one from Marilea Towery.

I had absolutely no intention of violating any federal rules. Prior to my support of Mack Mattingly I had not given significantly in any federal races and therefore I relied entirely upon the instructions provided by the Mattingly finance people. I felt confident that they know what the laws were and acted in compliance with them.

I will be more than happy to provide you any additional information you may need.

Sincerely yours,

Maurice J. Towery

Maurice J. Towery

2304351490 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: Matthew A. Towery

ADDRESS: Towery, Thompson, Gulliver, & Bunch, P.C.
Suite 350, 100 Northcreek, 3715 Northside Parkway
Atlanta, Georgia 30327

TELEPHONE: (404) 233-1050

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.

Aug 1 1990
Date

Maurice J. Towery
Signature

RESPONDENT'S NAME: Maurice J. Towery

ADDRESS: 4261 Woodland Brook Drive
Atlanta, Georgia 30339

HOME PHONE: _____

BUSINESS PHONE: _____

9304351490 03

06C 7180

90 AUG -3 AM 9:19

Date: July 31, 1990

TO: Federal Election Commission

FROM: Randall and Mary Walker (RE: MUR 2989)
611 Salem Church Road
Carrollton, GA 30117

90 AUG -3 AM 11:56

In response to your letter of July 20, we are declaring at this time that we are totally unaware of anything that we have done to warrant any action from this committee! We contributed $1,250 apiece to the MATT MATTINGLY campaign fund to attend a rally in Atlanta, GA, and have our picture made with PRESIDENT RONALD REAGAN who was helping them raise funds; we also contributed $150 for 15 tickets @ $10 for others to attend this function. We believed that these amounts were totally acceptable. If there is some problem, we were certainly unaware of it. Please advise us of what steps are appropriate at this point; we cannot comprehend that we are being prosecuted for anything whatsoever! If there is a problem, it was inadvertent---and due to misinformation afforded us.

We shall expect to hear from you as soon as possible about this situation.

Randall Walker
Mary G Walker

2304351149004

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1990

Dr. John C. Adams, Jr. P.C.
102 S. Zetterower Ave.
Statesboro, GA 30458

RE: MUR 2989
Dr. John C. Adams, Jr. P.C.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Dr. John C. Adams, Jr. P.C. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351490 5

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

2304351499006

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Dr. John C. Adams, Jr. P.C.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Dr. John C. Adams, Jr. P.C. made a contribution totaling $150 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Dr. John C. Adams, Jr. P.C. at the time the contribution was made. Therefore, there is reason to believe that Dr. John C. Adams, Jr. P.C. violated 2 U.S.C. § 441b(a).

2304351 4907

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

A.G. Spanos Development, Inc.
1140 Hammond Drive
Suite 1290
Atlanta, GA 30328

RE: MUR 2989
A.G. Spanos Development, Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe A.G. Spanos Development, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351490 8

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

2304351149 09

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: A.G. Spanos Development, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that A.G. Spanos Development, Inc. made a contribution totaling $500 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of A.G. Spanos Development, Inc. at the time the contribution was made. Therefore, there is reason to believe that A.G. Spanos Development, Inc. violated 2 U.S.C. § 441b(a).

2043514910

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Armada Vehicle Rental, Inc.
P.O. BOX 48405
Doraville, GA 30362

RE: MUR 2989
Armada Vehicle Rental, Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Armada Vehicle Rental, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

9304351491 1

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

2304351491 2

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Armada Vehicle Rental, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Armada Vehicle Rental, Inc. made a contribution totaling $240.59 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Armada Vehicle Rental, Inc. at the time the contribution was made. Therefore, there is reason to believe that Armada Vehicle Rental, Inc. violated 2 U.S.C. § 441b(a).

2304351491 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Avail-Ability Inc.
561 Thornton Road
Suite S
Lithia Springs, GA 30057

RE: MUR 2989
Avail-Ability Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Avail-Ability Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

9304351491 4

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

9304351491 5

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Avail-Ability Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Avail-Ability Inc. made a contribution totaling $250 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Avail-Ability Inc. at the time the contribution was made. Therefore, there is reason to believe that Avail-Ability Inc. violated 2 U.S.C. § 441b(a).

9304351491 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Bibb Distributing Co.
P.O. BOX 929
Macon, GA 31202

RE: MUR 2989
Bibb Distributing Co.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Bibb Distributing Co. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Bibb Distributing co.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Bibb Distributing Co. made a contribution totaling $250 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Bibb Distributing Co. at the time the contribution was made. Therefore, there is reason to believe that Bibb Distributing Co. violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1990

Bill Taylor & Associates
P.O. BOX 16402
Jacksonville, FL 32245-6402

RE: MUR 2989
Bill Taylor & Associates

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Bill Taylor & Associates ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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.

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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Bill Taylor & Associates

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Bill Taylor & Associates made a contribution totaling $500 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Florida Secretary of State Office has verified the corporate status of Bill Taylor & Associates at the time the contribution was made. Therefore, there is reason to believe that Bill Taylor & Associates violated 2 U.S.C. § 441b(a).

2304351492 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Rose Briglevich MD PC
4002 Ridge Rd.
Smyrna, GA 30080

RE: MUR 2989
Rose Briglevich MD PC

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Rose Briglevich MD PC ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Rose Briglevich MD PC

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Rose Briglevich MD PC made contributions totaling $1,300 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Rose Briglevich MD PC at the time the contribution was made. Therefore, there is reason to believe that Rose Briglevich MD PC violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON D C 20463

August 3, 1990

Brown Brothers Harriman & Co
59 Wall Street
New York, NY 10005

RE: MUR 2989
Brown Brothers Harriman & Co

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Brown Brothers Harriman & Co ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Brown Brothers Harriman & Co.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Brown Brothers Harriman & Co. made a contribution totaling $1,000 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The New York Secretary of State Office has verified the corporate status of Brown Brothers Harriman & Co. at the time the contribution was made. Therefore, there is reason to believe that Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Cathedral of Faith Church
Of God In Christ
P.O. Box 7116
Atlanta, GA 30357

RE: MUR 2989
Cathedral of Faith Church
Of God In Christ

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Cathedral of Faith Church Of God In Christ ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Cathedral of Faith Church
Of God In Christ

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Cathedral of Faith Church Of God In Christ made a contribution totaling $150 in connection with the the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Cathedral Of Faith Church Of God In Christ at the time the contribution was made. Therefore, there is reason to believe that Cathedral Of Faith Church Of God In Christ violated 2 U.S.C. § 441b(a).

2304351493 1

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1990

Century 21 Cook Realty, Inc.
P.O. BOX 926
Dalton, GA 30720

RE: MUR 2989
Century 21 Cook Realty, Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Century 21 Cook Realty, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Century 21 Cook Realty, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Century 21 Cook Realty, Inc. made a contribution totaling $125 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Century 21 Cook Realty, Inc. at the time the contribution was made. Therefore, there is reason to believe that Century 21 Cook Realty, Inc. violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1990

Century 21 Of The Southeast, Inc.
2200 Century Parkway
Suite 190
Atlanta, GA 30345

RE: MUR 2989
Century 21 Of The Southeast, Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Century 21 Of The Southeast, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Century 21 Of The Southeast, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Century 21 Of The Southeast, Inc. made a contribution totaling $1,000 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Century 21 Of The Southeast, Inc. at the time the contribution was made. Therefore, there is reason to believe that Century 21 Of The Southeast, Inc. violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Consolidated Tape & Label Co.
641 Smyrna Drive
Smyrna, GA 30080

RE: MUR 2989
Consolidated Tape & Label Co.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Consolidated Tape & Label Co. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Consolidated Tape & Label Co.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Consolidated Tape & Label Co. made a contribution totaling $1,000 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Consolidated Tape & Label Co. at the time the contribution was made. Therefore, there is reason to believe that Consolidated Tape & Label Co. violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Collins Brothers
RT. 3, BOX 88A
Vienna, GA 31092

RE: MUR 2989
Collins Brothers

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Collins Brothers ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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.

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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Collins Brothers

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Collins Brothers made contributions totaling $125 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Collins Brothers at the time the contributions were made. Therefore, there is reason to believe that Collins Brothers violated 2 U.S.C. § 441b(a).

2304351494943

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1990

Gary Cooper Construction
P.O. BOX 1012
Albany, GA 31702

RE: MUR 2989
Gary Cooper Construction

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Gary Cooper Construction ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2930435149944

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Gary Cooper Construction

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Gary Cooper Construction made a contribution totaling $300 in connection with the 1986 General Election in Georgia to Mack Máttingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Gary Cooper Construction at the time the contribution was made. Therefore, there is reason to believe that Gary Cooper Construction violated 2 U.S.C. § 441b(a).

2304351949 46

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Curry Farm Supply
P.O. BOX 326
Shellman, GA 31786

RE: MUR 2989
Curry Farm Supply

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Curry Farm Supply ("the Corporat violated 2 U.S.C. § 441b(a), a provision of the Federal Ele Campaign Act of 1971, as amended ("the Act"). The Factual a 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 the Corporation. 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 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 the Corporation, 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.

2304351499447

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Curry Farm Supply

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Curry Farm Supply made contributions totaling $150 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Curry Farm Supply at the time the contributions were made. Therefore, there is reason to believe that Curry Farm Supply violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1990

Dixie Trucking Company
P.O. BOX 960
Brunswick, GA 31521

RE: MUR 2989
Dixie Trucking Company

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Dixie Trucking Company ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Dixie Trucking Company

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Dixie Trucking Company made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Dixie Trucking Company at the time the contribution was made. Therefore, there is reason to believe that Dixie Trucking Company violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1990

Independent Freight Forwarders &
Customs Brokers Assoc Of Savannah Inc
P.O. BOX 1465
Savannah, GA 31402

RE: MUR 2989
Independent Freight Forwarders &
Customs Brokers Assoc Of Savannah
Inc

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Independent Freight Forwarders & Customs Brokers Assoc Of Savannah Inc ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc., made a contribution totaling $500 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc., at the time the contributions were made. Therefore, there is reason to believe that Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc., violated 2 U.S.C. § 441b(a).

2304351495

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Homeway Rentals of Montgomery
100 Dexter Ave.
Montgomery, AL 36104

RE: MUR 2989
Homeway Rentals of Montgomery

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Homeway Rentals of Montgomery ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

9304351495 6

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Homeway Rentals of Montgomery

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Homeway Rentals of Montgomery made a contribution totaling $1,000 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Alabama Secretary of State Office has verified the corporate status of Homeway Rentals of Montgomery at the time the contributions were made. Therefore, there is reason to believe that Homeway Rentals of Montgomery violated 2 U.S.C. § 441b(a).

2304351495 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Folsom Construction Company
RT. 4, BOX 34
Cordele, GA 31015

RE: MUR 2989
Folsom Construction Company

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Folsom Construction Company ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351449559

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.

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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Folsom Construction Company

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Folsom Construction Company made a contribution totaling $1,000 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Folsom Construction Company at the time the contribution was made. Therefore, there is reason to believe that Folsom Construction Company violated 2 U.S.C. § 441b(a).

2304351496

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Fesperman Insurance Co.
424 Memorial Drive
P.O. BOX 77
Waycross, GA 31501

RE: MUR 2989
Fesperman Insurance Co.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Fesperman Insurance Co. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Fesperman Insurance Co.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Fesperman Insurance Co. made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Fesperman Insurance Co. at the time the contribution was made. Therefore, there is reason to believe that Fesperman Insurance Co. violated 2 U.S.C. § 441b(a).

2043514964

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Farmers Tobacco Warehouse
P.O. BOX 432
Vidalia, GA 30474

RE: MUR 2989
Farmers Tobacco Warehouse

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Farmers Tobacco Warehouse ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Farmers Tobacco Warehouse

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Farmers Tobacco Warehouse made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Farmers Tobacco Warehouse at the time the contribution was made. Therefore, there is reason to believe that Farmers Tobacco Warehouse violated 2 U.S.C. § 441b(a).

2043514967

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Family and Marriage Resources
1221 South Lamar, Suite A
Austin, TX 78704

RE: MUR 2989
Family and Marriage Resources

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Family and Marriage Resources ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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.

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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Family and Marriage Resources

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Family and Marriage Resources made a contribution totaling $300 in connection with the the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Texas Secretary of State Office has verified the corporate status of Family and Marriage Resources at the time the contributions were made. Therefore, there is reason to believe that Family and Marriage Resources violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Ellis Building Systems
RT. 1, Highway 100 South
Tallapoosa, GA 30176

RE: MUR 2989
Ellis Building Systems

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Ellis Building Systems ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Ellis Building Systems

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Ellis Building Systems made contributions totaling $150 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Ellis Building Systems at the time the contributions were made. Therefore, there is reason to believe that Ellis Building Systems violated 2 U.S.C. § 441b(a).

2 3 0 4 3 5 1 4 9 7 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Dunwoody Office Supply, Inc.
5481 Chamblee-Dunwoody Rd.
Dunwoody, GA 30362

RE: MUR 2989
Dunwoody Office Supply, Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Dunwoody Office Supply, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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2930435149775

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Dunwoody Office Supply, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Dunwoody Office Supply, Inc. made a contribution totaling $150 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Dunwoody Office Supply, Inc. at the time the contribution was made. Therefore, there is reason to believe that Dunwoody Office Supply, Inc. violated 2 U.S.C. § 441b(a).

2043514976

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Reeves, Avary Associates
5063 Fox Forest Circle
Lilburn, GA 30247

RE: MUR 2989
Reeves, Avary Associates

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Reeves, Avary Associates ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Reeves, Avary Associates

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Reeves, Avary Associates made a contribution totaling $285 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Reeves, Avary Associates at the time the contribution was made. Therefore, there is reason to believe that Reeves, Avary Associates violated 2 U.S.C. § 441b(a).

2043514979

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

The Pinkerton & Laws Co.
875 Douglas Road, NE
Atlanta, GA 30342

RE: MUR 2989
The Pinkerton & Laws Co.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe The Pinkerton & Laws Co. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: The Pinkerton & Laws Co.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that The Pinkerton & Laws Co. made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of The Pinkerton & Laws Co. at the time the contribution was made. Therefore, there is reason to believe that The Pinkerton & Laws Co. violated 2 U.S.C. § 441b(a).

2304351499 82

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Bill Pilgrim Enterprises, Inc.
P.O. BOX 1265
Douglasville, GA 30133

RE: MUR 2989
Bill Pilgrim Enterprises, Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Bill Pilgrim Enterprises, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Bill Pilgrim Enterprises, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Bill Pilgrim Enterprises, Inc. made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Bill Pilgrim Enterprises, Inc. at the time the contribution was made. Therefore, there is reason to believe that Bill Pilgrim Enterprises, Inc. violated 2 U.S.C. § 441b(a).

2304351149885

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Pickett, Pickett & Pickett
Edge Building
225 N. Main Street
Jasper, GA 30143

RE: MUR 2989
Pickett, Pickett & Pickett

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Pickett, Pickett & Pickett ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351499886

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Pickett, Pickett & Pickett

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Pickett, Pickett & Pickett made a contribution totaling $1,000 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Pickett, Pickett & Pickett at the time the contribution was made. Therefore, there is reason to believe that Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a).

2304351499888

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Peoples' Transportation Services, Ltd.
P.O. Box 491261
Atlanta, GA 30349

RE: MUR 2989
Peoples' Transportation
Services, Ltd.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Peoples' Transportation Services, Ltd. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Peoples' Transportation Services, Ltd.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Peoples' Transportation Services, Ltd. made a contribution totaling $200 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Peoples' Transportation Services, Ltd. at the time the contribution was made. Therefore, there is reason to believe that Peoples' Transportation Services, Ltd. violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Pacelli High School
Trinity Drive
Columbus, GA 31906

RE: MUR 2989
Pacelli High School

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Pacelli High School ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351492

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Sincerely,

LeeAnn Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Pacelli High School

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Pacelli High School made a contribution totaling $200 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Pacelli High School at the time the contribution was made. Therefore, there is reason to believe that Pacelli High School violated 2 U.S.C. § 441b(a).

2043514994

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Patrician Properties
P.O. BOX 8879
Savannah, GA 31412

RE: MUR 2989
Patrician Properties

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Patrician Properties ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Patrician Properties

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Patrician Properties made a contribution totaling $150 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Patrician Properties at the time the contribution was made. Therefore, there is reason to believe that Patrician Properties violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Oral & Maxillofacial Surgery
Associates
5243 Snapfinger Woods Drive
Suite 106
Decatur, GA 30035

RE: MUR 2989
Oral & Maxillofacial Surgery
Associates

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Oral & Maxillofacial Surgery Associates ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2930435149298

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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2304351499

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Oral & Maxillofacial Surgery Associates

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Oral & Maxillofacial Surgery Associates made a contribution totaling $500 in connection with the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Oral & Maxillofacial Surgery Associates at the time the contributions were made. Therefore, there is reason to believe that Oral & Maxillofacial Surgery Associates violated 2 U.S.C. § 441b(a).

9304351500

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

OB-GYN Associates, PA
72 Plaza Highway
Marietta, GA 30060

RE: MUR 2989
OB-GYN Associates, PA

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe OB-GYN Associates, PA ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2930435150001

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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9304351502

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: OB-GYN Associates, PA

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that OB-GYN Associates, PA made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of OB-GYN Associates, PA at the time the contribution was made. Therefore, there is reason to believe that OB-GYN Associates, PA violated 2 U.S.C. § 441b(a).

2304351503

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Moultrie Surgical Assoc., PC
3004 2ND Street, SE
Moultrie, GA 31768

RE: MUR 2989
Moultrie Surgical Assoc., PC

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Moultrie Surgical Assoc., PC ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351500 4

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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2930435150005

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Moultrie Surgical Assoc., PC

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Moultrie Surgical Assoc., PC made a contribution totaling $200 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Moultrie Surgical Assoc., PC at the time the contribution was made. Therefore, there is reason to believe that Moultrie Surgical Assoc., PC violated 2 U.S.C. § 441b(a).

2043515006

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Alfred Hammack d/b/a
Morrow Professional Building
221 Upper Riverdale Rd. apt 5-e
Jonesboro, GA 30236

RE: MUR 2989
Alfred Hammack d/b/a

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Alfred Hammack d/b/a ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351507

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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2304351508

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Alfred Hammack d/b/a

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Alfred Hammack d/b/a made a contribution totaling $1,000 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Alfred Hammack d/b/a at the time the contribution was made. Therefore, there is reason to believe that Alfred Hammack d/b/a violated 2 U.S.C. § 441b(a).

2304351509

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Morris Newspaper Corp.
P.O. BOX 8167
Savannah, GA 31401

RE: MUR 2989
Morris Newspaper Corp.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Morris Newspaper Corp. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351510

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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2304351501

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Morris Newspaper Corp.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Morris Newspaper Corp. made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Morris Newspaper Corp. at the time the contribution was made. Therefore, there is reason to believe that Morris Newspaper Corp. violated 2 U.S.C. § 441b(a).

9304351501 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Morris Brown College
643 Martin Luther King, JR DR NW
Atlanta, GA 30314

RE: MUR 2989
Morris Brown College

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Morris Brown College ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351501 3

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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Morris Brown College

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Morris Brown College made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Morris Brown College at the time the contribution was made. Therefore, there is reason to believe that Morris Brown College violated 2 U.S.C. § 441b(a).

2043515015

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1990

Maricom Electronics, Inc
P.O. BOX 14287
Savannah, GA 31416

RE: MUR 2989
Maricom Electronics, Inc

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Maricom Electronics, Inc ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Maricom Electronics, Inc

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Maricom Electronics, Inc made a contribution totaling $150 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Maricom Electronics, Inc at the time the contribution was made. Therefore, there is reason to believe that Maricom Electronics, Inc violated 2 U.S.C. § 441b(a).

9304351501 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Lakeside Farm
RT. 1, BOX 223
Hayesville, NC 28904

RE: MUR 2989
Lakeside Farm

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Lakeside Farm ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Lakeside Farm

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Lakeside Farm made contributions totaling $1,175 in connection with the the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The North Carolina Secretary of State Office has verified the corporate status of Lakeside Farm at the time the contributions were made. Therefore, there is reason to believe that Lakeside Farm violated 2 U.S.C. § 441b(a).

9304351502 1

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 3, 1990

J&W Farms
P.O. BOX 354
Glenville, GA 30427

RE: MUR 2989
J&W Farms

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe J&W Farms ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

9304351502 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.

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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: J&W Farms

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that J&W Farms made a contribution totaling $150 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of J&W Farms at the time the contribution was made. Therefore, there is reason to believe that J&W Farms violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Lex Jolley & Company, Inc.
300 William-Oliver Bldg
Atlanta, GA 30303

RE: MUR 2989
Lex Jolley & Company, Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Lex Jolley & Company, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Lex Jolley & Company, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Lex Jolley & Company, Inc. made a contribution totaling $500 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Lex Jolley & Company, Inc. at the time the contribution was made. Therefore, there is reason to believe that Lex Jolley & Company, Inc. violated 2 U.S.C. § 441b(a).

2043515027

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Willis and Veenstra Invstmnt Co
415 East Monroe
Jacksonville, FL 32202

RE: MUR 2989
Willis and Veenstra Invstmnt Co

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Willis and Veenstra Invstmnt Co ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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.

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Willis and Veenstra Investment Co.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Willis and Veenstra Investment Co. made a contribution totaling $500 in connection with the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Florida Secretary of State Office has verified the corporate status of Willis and Veenstra Investment Co. at the time the contribution was made. Therefore, there is reason to believe that Willis and Veenstra Investment Co. violated 2 U.S.C. § 441b(a).

2304351503O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Wright Farms
2004 Nelms Road
Albant, GA 31705

RE: MUR 2989
Wright Farms

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Wright Farms ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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.

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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Wright Farms

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Wright Farms made a contribution totaling $3,150 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Wright Farms at the time the contribution was made. Therefore, there is reason to believe that Wright Farms violated 2 U.S.C. § 441b(a).

2304351503 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

General Roofing Co. d/b/a
White Roofing Company
P.O. BOX 14423
Atlanta, GA 30324

RE: MUR 2989
General Roofing Co. d/b/a

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe General Roofing Co. d/b/a ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: General Roofing Co. d/b/a

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that General Roofing Co. d/b/a made a contribution totaling $275 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of General Roofing Co. d/b/a at the time the contribution was made. Therefore, there is reason to believe that General Roofing Co. d/b/a violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Weatherly & Associates, Inc.
P.O. BOX 503
Tybee Island, GA 31328

RE: MUR 2989
Weatherly & Associates, Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Weatherly & Associates, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Weatherly & Associates, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Weatherly & Associates, Inc. made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Weatherly & Associates, Inc. at the time the contribution was made. Therefore, there is reason to believe that Weatherly & Associates, Inc. violated 2 U.S.C. § 441b(a).

2304351503 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Bill Walker and Associates
Mc Kinnon Airport
St. Simons, Island, GA 31522

RE: MUR 2989
Bill Walker and Associates

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Bill Walker and Associates ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Bill Walker and Associates

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Bill Walker and Associates made a contribution totaling $300 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Bill Walker and Associates at the time the contribution was made. Therefore, there is reason to believe that Bill Walker and Associates violated 2 U.S.C. § 441b(a).

2304351042

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Ed Voyles Chrysler-Plymouth
789 Cobb Parkway, SE
Marietta, GA 30062

RE: MUR 2989
Ed Voyles Chrysler-Plymouth

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Ed Voyles Chrysler-Plymouth ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Ed Voyles Chrysler-Plymouth

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Ed Voyles Chrysler-Plymouth made a contribution totaling $275 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Ed Voyles Chrysler-Plymouth at the time the contribution was made. Therefore, there is reason to believe that Ed Voyles Chrysler-Plymouth violated 2 U.S.C. § 441b(a).

2043515045

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Vaughn Lumber Company
P.O. BOX 31
Forsyth, GA 31029

RE: MUR 2989
Vaughn Lumber Company

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Vaughn Lumber Company ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Vaughn Lumber Company

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Vaughn Lumber Company made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Vaughn Lumber Company at the time the contribution was made. Therefore, there is reason to believe that Vaughn Lumber Company violated 2 U.S.C. § 441b(a).

2043515048

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Stubbs Shipping Company
P.O. BOX 194
Sea Island, GA 31561

RE: MUR 2989
Stubbs Shipping Company

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Stubbs Shipping Company ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Stubbs Shipping Company

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Stubbs Shipping Company made a contribution totaling $200 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Stubbs Shipping Company at the time the contribution was made. Therefore, there is reason to believe that Stubbs Shipping Company violated 2 U.S.C. § 441b(a).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Stricklands Pharmacy
111 Bonard
Glennville, GA 30427

RE: MUR 2989
Stricklands Pharmacy

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Stricklands Pharmacy ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

9304351505 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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Leelann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Stricklands Pharmacy

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Stricklands Pharmacy made a contribution totaling $150 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Stricklands Pharmacy at the time the contribution was made. Therefore, there is reason to believe that Stricklands Pharmacy violated 2 U.S.C. § 441b(a).

9304351505 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Standard Southeast, Inc.
6456 Warren DR.
Norcross, GA 30093

RE: MUR 2989
Standard Southeast, Inc.

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Standard Southeast, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351505 5

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Standard Southeast, Inc.

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Standard Southeast, Inc. made a contribution totaling $150 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Standard Southeast, Inc. at the time the contribution was made. Therefore, there is reason to believe that Standard Southeast, Inc. violated 2 U.S.C. § 441b(a).

9304351505 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Southern Energy
P.O. BOX 960
Brunswick, GA 31520

RE: MUR 2989
Southern Energy

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Southern Energy ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

2304351558

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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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2304351505 9

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Southern Energy

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Southern Energy made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Southern Energy at the time the contribution was made. Therefore, there is reason to believe that Southern Energy violated 2 U.S.C. § 441b(a).

2043515060

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Robert J. Shircliff and Associates
2529 Gulf Life Tower
Jacksonville, FL 32207

RE: MUR 2989
Robert J. Shircliff and Associates

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Robert J. Shircliff and Associates ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

9304351506 1

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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Robert J. Shircliff and Associates

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Robert J. Shircliff and Associates made contributions totaling $750 in connection with the 1986 Senate Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Florida Secretary of State Office has verified the corporate status of Robert J. Shircliff and Associates at the time the contributions were made. Therefore, there is reason to believe that Robert J. Shircliff and Associates violated 2 U.S.C. § 441b(a).

2043515063

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

Riverside Development
3590 Riverside Drive
P.O. BOX 7006
Macon, GA 31298

RE: MUR 2989
Riverside Development

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe Riverside Development ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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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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 Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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9304351506 5

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: Riverside Development

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that Riverside Development made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of Riverside Development at the time the contribution was made. Therefore, there is reason to believe that Riverside Development violated 2 U.S.C. § 441b(a).

2 3 0 4 3 5 1 5 0 6 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1990

William L. Reno and Associates
P.O. BOX 606
Statesboro, GA 30458

RE: MUR 2989
William L. Reno and Associates

Dear Gentlemen:

On June 19, 1990, the Federal Election Commission found that there is reason to believe William L. Reno and Associates ("the Corporation") violated 2 U.S.C. § 441b(a), 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 the Corporation. 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 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 the Corporation, 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.

9304351506 7

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For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR: 2989

RESPONDENT: William L. Reno and Associates

The Federal Election Campaign Act of 1971, as amended, prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a).

A review of the reports filed by the Friends of Mattingly reveals that William L. Reno and Associates made a contribution totaling $250 in connection with the 1986 General Election in Georgia to Mack Mattingly, a candidate for the U.S. Senate. The Georgia Secretary of State Office has verified the corporate status of William L. Reno and Associates at the time the contribution was made. Therefore, there is reason to believe that William L. Reno and Associates violated 2 U.S.C. § 441b(a).

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06L 7175

DAVIDSON, CALHOUN & MILLER, P.C.
ATTORNEYS AND COUNSELLORS AT LAW
THE JOSEPH HOUSE
828 BROADWAY
COLUMBUS, GEORGIA 31994-1599

J. QUENTIN DAVIDSON, JR.
MARCUS B. CALHOUN, JR.
CHARLES W. MILLER

P. O. BOX 2828
(404) 327-2552
TELECOPIER
(404) 323-5838

August 2, 1990

HAND DELIVERED
90 AUG -3 AM 10:24

FEDERAL EXPRESS

Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Attention: Staff Person

Re: MUR 2989 Lovick P. Corn

Dear Sir:

Enclosed herewith please find Lovick P. Corn's Statement of Designation of Counsel.

If you have any questions, or desire further information, please do not hesitate to call.

Very truly yours,

DAVIDSON, CALHOUN & MILLER, P.C.

By: Charles W. Miller
Charles W. Miller

CWM/cp

90 AUG -3 AM 11:53

2304351507 0

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989
~~Lovick P.~~ Corn

NAME OF COUNSEL: J. Quentin Davidson, Jr.
Marcus B. Calhoun, Jr.
Charles W. Miller

ADDRESS: Davidson, Calhoun & Miller, P.C.
Post Office Box 2828
Columbus, Georgia 31994-1599

TELEPHONE: (404) 327-2552

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

8/2/90
Date

Lovick P. Corn
Signature

RESPONDENT'S NAME: Lovick P. Corn
Post Office Box 140
Columbus, Georgia 31993

HOME PHONE:
(404) 571-6040

2304351507

OGC 7169

OLIVER MANER & GRAY

ATTORNEYS AT LAW

218 STATE STREET, WEST — POST OFFICE BOX 10186
SAVANNAH, GEORGIA 31412
TELEPHONE (912) 236-3311
FAX (912) 236-8725

THOMAS S. GRAY, JR
WILLIAM P. FRANKLIN, JR
JAMES L. PANNELL
JULIAN R. FRIEDMAN (GA & S.C.)
WILLIAM T. MOORE, JR
DAVID H. DICKEY
I. GREGORY HODGES
ROBERT W. SCHIVERA (GA & N.C.)
PATRICK T. O'CONNOR
THOMAS A. WITHERS
JAMES P. GERARD
WENDY W. WILLIAMSON
PATRICIA C. TANZER
JEFFREY A. FELSER
LAURA S. VINCZE
PAUL G. JUSTICE

CHARLES L. SPARKMAN
OF COUNSEL

TWIGGS & OLIVER
1897-1905
OLIVER & OLIVER
1906-1941
OLIVER, OLIVER & DAVIS
1942-1955
OLIVER, DAVIS & MANER
1955-1963
OLIVER & MANER
1963-1967

JOSEPH M. OLIVER
1907-1989
EDWIN MANER, JR.
1918-1984

July 31, 1990

VIA CERTIFIED MAIL

90 AUG -3 AM 11:52

Mr. Jeffrey Long
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 2989 M. C. Anderson

Dear Mr. Long:

Please be advised that we represent M. C. Anderson in reference to the above matter. Accordingly, I am enclosing a Statement of Designation of Counsel signed by Mr. Anderson.

The letter directed to Mr. Anderson by the Federal Election Commission, dated July 20, 1990, was not received by Mr. Anderson until July 26th. The factual analysis shows that the alleged contributions were made more than six years ago and for this reason we respectfully request an extension of time to answer to the Office of the General Council in order for us to investigate and determine the circumstance under which the contributions were made, and to attempt to locate the checks. For this reason, we request that the reply which is due August 10, 1990, be extended for twenty days or on or before August 28, 1990.

In accordance with our telephone conversation of today, this letter is being directed to your attention.

Sincerely,

OLIVER, MANER & GRAY

CHARLES L. SPARKMAN
Of Counsel

CLS/ms

90 AUG -3 AM 10:52

2930435150 72

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Charles L. Sparkman

ADDRESS: Oliver, Maner & Gray
P. O. Box 10186
Savannah, GA 31412

TELEPHONE: (912) 236-3311

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.

July 31, 1990
Date

M. C. Anderson
Signature

RESPONDENT'S NAME: M. C. Anderson

ADDRESS: P. O. Box 7034
Garden City, GA 31408

HOME PHONE:

BUSINESS PHONE: 964-5712

9304351507 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 6, 1990

Charles L. Sparkman, Esquire
Oliver Maner & Gray
P.O. Box 10186
Savannah, GA 31412

RE: MUR 2989
M.C. Anderson

Dear Mr. Sparkman:

This is in response to your letter dated July 31, 1990, which we received on August 3, 1990, requesting an extension of 18 days until August 28, 1990 to respond to the reason to believe finding in this matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on August 28, 1990.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

9304351507 4

OGC 7190

LASSETER TRACTOR CO., INC.
P. O. Box 726
Moultrie, Georgia 31776
Phone 912-985-1027

90 AUG -6 AM 11:35

MUR 2989

August 3, 1990

Federal Election Commission
999 E. St. N. W.
Washington, DC 20463

Attention: Mr. Jeffrey Long

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG -6 PM 12:52

2304351507S

Dear Mr. Long:

Per our telephone conversation this morning I am enclosing copies of all four checks mentioned in your letter. As I told you on the phone the check for $1000.00 dated May 5, 1985, was written to Ga. Tribute to the President. I didnot receive a written invitation to this event, I was called on the phone to make a $1000.00 contribution as President Reagan was to be in Atlanta. However, it is true that this check was deposited in the Citizens National Bank for Friends of Mattingly, thru no fault of mine. The other three checks mentioned in your letter were made out to Friends of Mattingly, the $1000.00 check dated January 14, 1986 was a contribution for the primary and the other two checks were intended for the general election.

It was not my intention to do anything wrong. I would appreciate very much any thing that you can do to help me resolve this matter.

Yours truly,

Willard Lasseter

Willard Lasseter

encl: 4

WILLARD LASSETER, SPECIAL ACCOUNT
P. O. BOX 726
CULTRIE, GA 31776

1790

64-175
612

5-24 19 85

2487 2502 13 08-31-85 130289

PAY TO THE ORDER OF Dr. Tribute to the President $ 1,000.00

093185

ONE THOUSAND DOLLARS 00 CTS DOLLARS

AMERICAN BANKING COMPANY
CULTRIE/DOERUN, GEORGIA

WILLARD LASSETER

FOR

Willard Lasseter

930435150076

PAY ANY BANK
ATLANTA, GA.

PAY ANY BANK

30

64-5

FRIENDS OF MATTINGLY

P.E.G.

C.S. BANKS

ATLANTA GEORGIA

64-5

FOR DEPOSIT ONLY

1906

The Citizens

PAY ANY BANK
ATLANTA, GA.
0487 2502 13 05-31-85 130289

WK130778 WK135886

P. O. BOX 726
MOULTRIE, GA. 31776

1-14 19 86 64-175/612

PAY TO THE ORDER OF Friend of Mattingly $ 1,000 00

ONE THOUSAND AND 00/100 DOLLARS

AMERICAN BANKING COMPANY
MOULTRIE/DOERUN, GEORGIA

WILLARD LASSETER

FOR

Willard Lasseter

049 34 732
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GEORGIA
049 34 732
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY

930435150 77

WILLARD LASSETER 12-75
SPECIAL ACCOUNT
BOX 726,
MOULTRIE, GA 31776

138

64-175
612

Check

Pay to the order of Friends of Mattingly $ 150.00

AMERICAN BANKING COMPANY
MOULTRIE/DOERUN, GEORGIA

For

4/18 086

64-175

Willard Lasseter

64-5

C & S NAT'L BK.
ATLANTA, GA.
PAY ANY BANK

APR 25

PAY ANY BANK, PEG
C & S NAT'L BANK
ATLANTA, GEORGIA

64-5

FOR DEPOSIT ONLY
TO THE ORDER OF
Big Grizzard & Sons Inc.
049 34 782

049 34 782

FRB 061000146 4-25-88 1273133611

9304351507 8

SPECIAL ACCOUNT
BOX 726
MOULTRIE, GA 31776

64-175
612

6-17 1986

Check

Pay to the order of Friend of Mattingly $ 150 00

COUPONS

203h 2077 13 05-24-86 1100

THE SUM OF 150 DOLLARS 00 CTS

Dollars

AMERICAN BANKING COMPANY
MOULTRIE/DOERUN, GEORGIA

For

William Jan Garcia

⑆049 34 782⑆

The Citizens & Southern National Bank
ATLANTA, GEORGIA

⑆049 34 782⑆

FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY

JE 86 24

A S NATL BK
ATLANTA, GA
AT ANY BANK

930435150 79

06C7208

DAVIDSON, CALHOUN & MILLER, P.C.
ATTORNEYS AND COUNSELLORS AT LAW
THE JOSEPH HOUSE
828 BROADWAY
COLUMBUS, GEORGIA 31994-1599

J. QUENTIN DAVIDSON, JR.
MARCUS B. CALHOUN, JR.
CHARLES W. MILLER

P. O. BOX 2828
(404) 327-2552
TELECOPIER
(404) 323-5838

August 3, 1990

FEDERAL EXPRESS

Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Attention: Elizabeth Campbell

Re: MUR 2989 Lovick P. Corn

Dear Ms. Campbell:

In accordance with our telephone conversation of today, I hereby request an extension of time in which to reply to Mr. McGarry's letter, dated July 20, 1990, regarding the above-referenced matter. A copy of such letter is enclosed herewith.

As we discussed, we feel that an extension to August 22, 1990 would be in order so that we can obtain the information which we requested from you in order to resolve this matter. You felt that this extension would not be a problem and further stated that you would send us a letter granting the extension to Mr. Corn.

Thank you very much for your helpful and cooperative attitude. I look forward to a successful resolution of the above-referenced matter.

In the meantime, if you have any questions, or desire further information, please do not hesitate to call.

Very truly yours,

DAVIDSON, CALHOUN & MILLER, P.C.

By: Charles W. Miller

Charles W. Miller

CWM/cp
cc: Mr. Lovick P. Corn
Mr. J. Quentin Davidson, Jr.
Mr. David A. Buehler

90 AUG -6 PM 12:54
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 AUG -6 AM 9:10
MAIL DEPARTMENT

2304351508O

MUR 7203

Emory Winship
13 Peninsula Dr
Stratham, NH
03885

31 July 1990

90 AUG -6 PM 12:53

Federal Election Commission
Washington, D C 20463

Re MUR 2989 Emory Winship

Gentlemen

I have received your notice dated 20 July which was sent to my home at P O Box 1566 in Fernandina Beach, FL, and forwarded on to me at the above address, where we are vacationing this summer. I have spoken with your office this morning.

I can assure you of one thing. If I have violated the act, and, from my conversation with your office this morning, it would seem that I have, it was totally inadvertant. Nonetheless, it would seem, from the facts you have laid out, I did. I have all of my records in my home in Florida, but I believe that I also have them in the computer I am writing this on. The program is, however, copy protected (Multiplan) and I have requested an unlocked copy of the program so that I may check them. I do not expect to get this until Friday or Saturday of this week, but will be out of town on Wednesday, Thursday and Friday anyway.

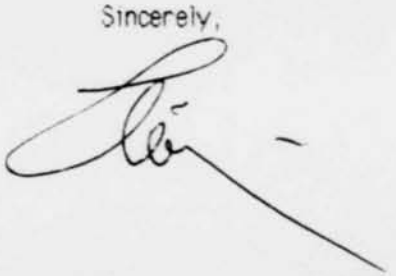
Therefore, although I have little reason to doubt that your records are correct, and, indeed, if my memory serves me correctly, they are, I would still like to check them, and therefore request an extension long enough to allow me to do this. The end of next week should be ample for me to check my records and get back with you.

I am very sure that I made no notations on my checks or other records of the reason for these contributions, thinking they were fairly obvious. My ignorance of the law is no excuse. That, too, is fairly obvious. I made these contributions, however, with no thought as to whether the money would be used for in a primary or general election. Frankly I didn't think that Senator Mattingly was going to have any opposition in the primary, and so felt, when I gave the money, it would be used mostly for his general campaign, if I gave any thought to it at all. I also thought, incorrectly it seems, that contributions were limited by the year rather than by campaigns. It seems that I was still mistaken.

This is the whole story anyway, and, as I say, the only way I would dispute the facts as you have them is if I should find from my records that they are not correct.

Please advise me

Sincerely,



2304351508 1

OGC 7197

SELL & MELTON
ATTORNEYS AT LAW
FOURTEENTH FLOOR CHARTER MEDICAL BUILDING
POST OFFICE BOX 229
MACON, GEORGIA 31297-2899
TELEPHONE (912) 746-8521
TELECOPIER (912) 745-6426

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG -6 AM 10:58

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG -6 PM 12:53

August 2, 1990

Mr. Jeffrey Long
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2989 Albert L. Luce, Jr.

Dear Mr. Long:

Thank you for returning my call and discussing the above captioned matter with me on Friday.

I am enclosing herewith a Power of Attorney from Mr. Luce appointing Buckner F. Melton, one of my partners, and me to represent him in this matter and to receive all communications.

As I told you on the phone, Mr. Luce has a copy of the personal check dated May 22, 1985 payable to "Georgia Tribute to the President" in the amount of $1,000.00, but he has destroyed his cancelled checks and his checkbook for 1984 and prior years.

He respectfully requests that you send him a copy of the check indicating that a $1,000.00 contribution was made on 11/1/83. You also indicated that the figure of $1,300.00 has "totalled excessives in the primary" which probably indicated that there was a contribution prior to 11/1/83, and we respectfully request a copy of any evidence that you have of such prior contributions.

Mr. Luce had no intention whatsoever of violating the Federal Election laws. We understand that we may supply evidence of extenuating circumstances on or before August 15, 1990.

2304351508 2

It will help us greatly if you can supply photocopies of the missing checks which form a basis of the complaint.

Sincerely yours,

John D. Comer

JDC*b
enc.
cc: Mr. Albert L. Luce, Jr.

JOHN D. COMER

9304351500833

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: John D. Comer and Buckner F. Melton

ADDRESS: Sell & Melton

P. O. Box 229

Macon, Ga. 31297-2899

TELEPHONE: (912) 746-8521

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.

July 30, 1990
Date

Albert L. Luce, Jr.
Signature

RESPONDENT'S NAME: Albert L. Luce, Jr.

ADDRESS: 519 Westview Drive

Fort Valley, Ga. 31030

HOME PHONE:

BUSINESS PHONE: (912) 825-2021

9304351508 4

MUR 7218

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 AUG -6 PM 1:04

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 AUG -6 PM 4:15

July 25, 1990

Lee Ann Elliott, Chairman
Federal Elections Commission
Washington, D.C. 20463

Dear Ms. Chairman,

I am in receipt of your recent letter regarding MUR 2989, Committee to Re-Elect Senator Paula Hawkins and myself as treasurer.

Let me assure you that in 1986, sole purpose of the Committee to Re-Elect Senator Paula Hawkins was just that. We were not in the business of making excessive contributions to other campaigns. Our main concern was media buys and the massive dollars they required. We needed every penny our campaign could scrape together.

Although our records from this time frame are not available, I do recall that we had a joint fundraising event with Senator Mattingly in Jacksonville. In fact, I attended that event on behalf of Senator Hawkins. Is is possible that there was a bookkeeping error in that event? I do not know since the problem was evidently discovered in reviewing Senator Mattingly's report. Could you send me the materials that concern you for my review?

Our campaign is inactive. We have a few debts that we are carrying, but we are not active in any way. Other than the materials we are required to keep by law, there are no records available. What can I do to help you resolve this matter under these circumstances?

Sincerely,

Genean McKinnon

GHM:tw

2304351508 5

OGC 7220
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG -7 AM 11:23

Citizens and Southern Trust Company

P. O. Box 4446, Atlanta, Georgia 30302, Telephone 404 897-3067

Jon G. White, *Senior Vice President*

August 1, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG -7 AM 6:55

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2989
A. T. Kennedy

Dear Mr. McGarry:

This acknowledges receipt of your letter dated July 20, 1990, addressed to Mr. A. T. Kennedy.

This is to inform you that Mr. Albert Thornton Kennedy died on September 20, 1985. Our Bank and Mrs. Gayle E. Kennedy are serving as the executors of the Estate of Albert Thornton Kennedy.

Please let me know if any action is required by the executors concerning your inquiry of July 20, 1990.

Cordially yours,

Jon G. White
Senior Vice President

cc: Mr. Philip Thompson

JGW:cw

9304351500836

001 7226
RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG -7 PM 4:04

LAW OFFICES

HICKS, MALOOF & CAMPBELL
A PROFESSIONAL CORPORATION

ROBERT E. HICKS
MAURICE N. MALOOF
CHARLES E. CAMPBELL
ROBERT A. BARTLETT
CHARLES E. WILSON III
ROBERT E. TRITT
BRUCE M. EDENFIELD
PETER J. QUIST
J. MICHAEL LEVENGOOD
J. DAVID DANTZLER, JR.
STEVEN K. BENDER
MICHAEL S. BRADLEY

SUITE 2200, MARQUIS TWO TOWER
285 PEACHTREE CENTER AVENUE, N.E.
ATLANTA, GEORGIA 30303-1234
(404) 588-1100
FACSIMILE (404) 420 7474
WRITER'S DIRECT DIAL NUMBER
420-7403

LISA WEBB WANNAMAKER
HENRY F. SEWELL, JR.
VIRGINIA B. PETERSON
DARREN K. HENSLEY
VICTORIA A. GEORGE
LAWRENCE H. WEXLER
EDWARD D. HIRSCH
JAMES A. HARVEY
THOMAS R. WILLIAMS, JR.
STEPHEN R. CARMODY
KIM L. MARCHNER

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG -7 PM 4:27

August 6, 1990

VIA FEDERAL EXPRESS

23043515087

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

RE: MUR2989 Eugene Kelly.

Dear Mr. McGarry:

We represent Mr. Eugene Kelly in regard to the above matter and enclose herewith the Statement of Designation of Counsel executed by Mr. Kelly.

This letter is to notify the Federal Election Commission that Mr. Kelly is interested in pursuing pre-probable cause conciliation puruant to 11 C.F.R. §111.18(d). We have discussed this matter with Staff Counsel for the Federal Election Comission and understand that in the event the Federal Election Commission elects not to pursue pre-probable cause conciliation or no agreement is reached as a result of pre-probable cause conciliation that Mr. Kelly may thereafter submit such evidence as he desires to demonstrate that no action should be taken against him. Under those circumstances, Mr. Kelly hereby requests pre-probable cause conciliation.

We will transmit to your office by the end of this month such statements in affidavit form and such documents as Mr. Kelly desires to submit in connection with the pre-probable cause conciliation effort.

Thank you for your attention to this matter.

Very truly yours,

HICKS, MALOOF & CAMPBELL, a
Professional Corporation

By: Charles E. Campbell
CHARLES E. CAMPBELL

CEC/jlc
Enclosure
cc: Mr. Eugene W. Kelly

9304351508 8

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: Hicks Maloof & Campbell

ADDRESS: Suite 2200 Marquis Two Tower
285 Peachtree Ctr Ave NE
Atlanta, GA 30303-1234

TELEPHONE: 404-588-1100

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.

7-23-90
Date

Signature Eugene W Kelly

RESPONDENT'S NAME: Eugene W Kelly

ADDRESS: Rt. Box 117
Monticello, GA 31064

2304351500 89

OGC 7236

LAW OFFICES

GLASS, McCULLOUGH, SHERRILL & HARROLD

1409 PEACHTREE STREET, N. E.

ATLANTA, GEORGIA 30309

TELEPHONE (404) 885-1500
TELEX: 543231
TELECOPIER: (404) 892-1801

WRITER'S DIRECT NUMBER

(404)-885-6774

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG -8 PM 12 14

July 30, 1990

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

90 AUG -8 AM 9:33

Office of General Counsel
Federal Elections Commission
Washington, D.C. 20463

Attention: Jeffrey Long

Re: MUR 2989
John M. Stuckey, Jr.
Request for Extension
of Time to Answer

Gentlemen:

In accordance with my telephone conversation of today's date with Mr. Jeffrey Long in your office, please accept this letter as written request for a thirty (30) day extension of time in which to respond to the above referenced MUR. My request for an extension is based upon the fact (i) that I have changed office addresses from 1005 Virginia Avenue, Suite 200, Atlanta, Georgia 30354 to 1409 Peachtree Street, N.E., Atlanta, Georgia 30309 and received the Commission's letter dated July 20, 1990 and mailed to my former office address this date, and, (ii) that it will be necessary for me to retrieve my check records and other financial data relating to calendar years 1984 and 1985 contributions from dead file storage.

Thank you very much for your attention to this matter.

Sincerely,

John M. Stuckey, Jr.

(00016/36)

2304351509 0

OGC 7238

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 AUG -8 AM 9:32

GARY W. ROLLINS
P.O. BOX 647
ATLANTA, GEORGIA 30301

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG -8 PM 12:14

July 31, 1990

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

Attention Jeffrey Long

Re: MUR 2989
Gary W. Rollins

Dear Mr. Long:

This letter is in response to Mr. McGarry's letter to me dated July 20, 1990. Enclosed is the form designating S. Jarvin Levison as my counsel. His direct dial number is (404) 527-4602.

There is not much that I am able to explain. Until I received Mr. McGarry's letter, I was unaware that I had made any contribution to the Mattingly Senatorial Campaign that exceeded authorized limits. I have searched my files and the best that I can recall is that on several different occasions over a two-year period I was contacted by different friends to make contributions to the Mattingly campaign. I did not give any thought to the matter other than Mr. Mattingly was a good Senator.

I probably assumed that the campaign committee would be aware if my contribution exceeded the proper limit and advise me (or remove my name for possible additional contributions).

I do note that one of my checks was made payable to "Georgia Tribute to The President" on behalf of my wife and me (our two social security numbers are on the check). I probably was unaware that the money was going to the Mattingly campaign. I believe I was called and told the President was coming to Atlanta for a Republican function.

I considered all of the contributions to be on behalf of my wife and me, and that they would be used for both the primary and the general election.

2304351509 1

I would like to pursue the pre-probable cause conciliation referred to in Mr. McGarry's letter. I assume Mr. Levison will be contacted.

Sincerely,

Gary W. Rollins

GWR/ch

Enclosure

2304351509 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jarvin Levison

ADDRESS: Arnall Golden & Gregory
55 Park Place
Atlanta, GA 30335

TELEPHONE: (404) 527-4602

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.

July 31, 1990
Date

Signature

RESPONDENT'S NAME: Gary W. Rollins

ADDRESS: c/o R.F.I. Company
P. O. Box 647
Atlanta, GA 30301

HOME PHONE:

BUSINESS PHONE: (404) 888-2300

9304351509 93

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 8, 1990

Charles W. Miller, Esquire
Davidson, Calhoun & Miller, P.C.
Attorneys and Counsellors at Law
The Joseph House
828 Broadway
Columbus, Georgia 31994-1599

RE: MUR 2989
Lovick P. Corn

Dear Mr. Miller:

This is in response to your letter dated August 3, 1990, which we received on August 6, 1990, requesting an extension until August 22, 1990 to respond to MUR 2989. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on August 22, 1990.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

9304351509 4

OGC 7362

BILL TAYLOR & ASSOCIATES, INC.
4161 CARMICHAEL AVENUE, SUITE 135 / JACKSONVILLE, FLORIDA 32207 (904) 398-0000

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG -9 PM 3:50

6 August 1990

Federal Elections Commission
Washington, D.C. 20463

Re: MUR 2989
Bill Taylor & Associates

To Whom it May Concern:

We are responding to your letter of August 3 , 1990 addressed to Bill Taylor & Associates.

There appears to be some confusion about the account on which Bill Taylor, an individual, made a contribution to the Friends of Mattingly in connection with the 1986 Senate Election.

I am enclosing a photocopy of this check, it is clearly a personal account and has always been. When I incorporated in 1983 the Corporate account was changed only to the extent of adding a (,)and (INC) It is still shown that way. Enclosed is a corporate check specimen for your reference.

Please be assured my records are available to you and I am pleased to assist in this matter of clarification.

Yours truly,

William M. Taylor

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG -9 PM 4:35

9304351509 5

Personal acct

BILL TAYLOR & ASSOC. 02-74
P. O. BOX 16402
JACKSONVILLE, FL 32245-6402

P1D T5601 35802510 2

4156

63-544/630

2-19- 1985

PAY TO THE ORDER OF Friends of Mattingly

$ 500 00/XX

Five Hundred and 00/XX DOLLARS

PAID
MAR 7 85

American National Bank
OF JACKSONVILLE
BEACH BOULEVARD OFFICE
5622 BEACH BOULEVARD
JACKSONVILLE, FLORIDA 32207

BILL TAYLOR & ASSOC.

FOR Contribution

930435150 96

60178

PAY ANY BANK OR TRUST CO.
AMERICAN
NATIONAL BANK
OF JACKSONVILLE

63-544 63-544

MAR 21 '85

0 6 9 0 0 U

AMERICAN NATIONAL BANK OF JACKSONVILLE
INSTALLMENT LOAN DEPARTMENT

930435-150097

UGC 7361

August 8, 1990

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2989
William A. Fickling, Jr.
P. O. Box 209
Macon, Georgia 31298

90 AUG -9 PM 4:29

Dear Mr. McGarry:

I have received your July 20, 1990 letter relating to my contributions to Senator Mack Mattingly during his primary campaign in 1985. Although it is difficult to reconstruct the circumstances of my 1985 contributions at this time, I have pulled the two cancelled checks that you identified in your Factual and Legal Analysis as resulting in the excessive contributions, and I believe the explanation is straight-forward.

Copies of the two cancelled checks are attached. Both checks are payable to "Georgia Tribute to the President", but the endorsement reflects that they were deposited to "Friends of Mattingly". I have no explanation for that discrepancy. My recollection is that I was asked to contribute to a dinner honoring President Reagan. Apparently the proceeds of that dinner went directly to the Mattingly campaign. I do not recall knowing that the event was a Mattingly fundraiser, and I am surprised today to discover that the checks were deposited to the Mattingly campaign.

In any event, one of the $1,000 contributions was intended to be from my wife, Neva L. Fickling, and I expect that each of the checks was submitted with some direction reflecting that the contributions were to be allocated $1,000 to me and $1,000 to my wife. I have not found copies of anything in my own records that reflect those directions, but I would not have contributed $2,000 to a single event, and I don't believe that anyone in my family or anyone in my company who might have recommended that I make a contribution would have allowed me to make such a contribution. I believe that whoever was responsible for the bookkeeping for the dinner failed to follow our directions that those two checks be allocated $1,000 to me and $1,000 to my wife.

Perhaps a reason that our directions were not followed is that both checks were written on preprinted blank checks that listed only my name and address. In fact, those checks are drawn against a joint account, account number in the name of "Mr. Wm. A. Fickling, Jr. or Mrs. Neva L. Fickling". Attached is a recent account statement that identifies that account accurately as being

9304351509 8

a joint account. Adding further to the confusion, both of the checks in question were signed by my son, William A. Fickling, III, who is an authorized signatory, although not an owner, of the joint account. While it would have been less confusing if I had signed a check from the joint account bearing my printed name and my wife had signed a separate check against the joint account bearing her name, in point of fact, I believe that we made an effort to give separate directions when we delivered the checks to assure that they were attributed separately to each of us.

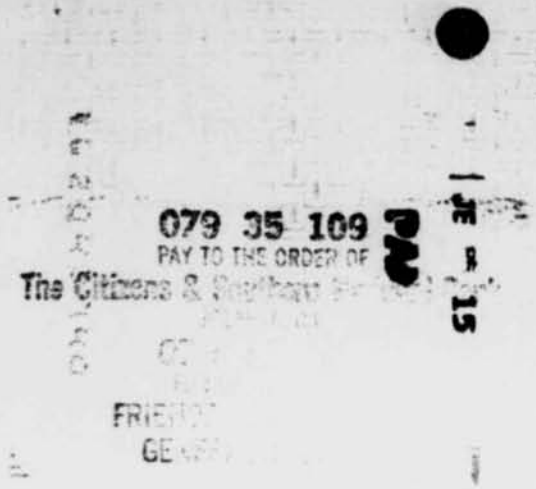
While this is a complicated explanation five years after the event, I believe it to be accurate. I hope this satisfactorily demonstrates to you that no further action should be taken. I am not sure what further information I can provide you, but if you need anything further, please contact me so that we can resolve this matter promptly.

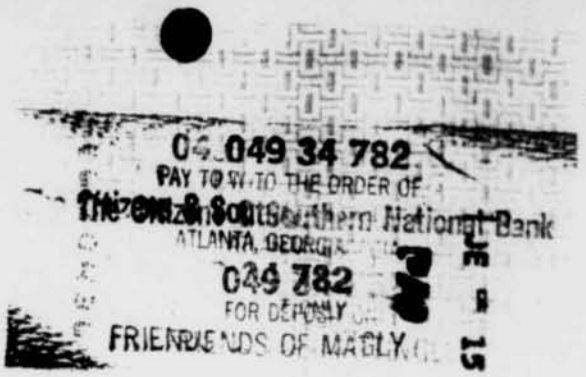
Thank you for your assistance.

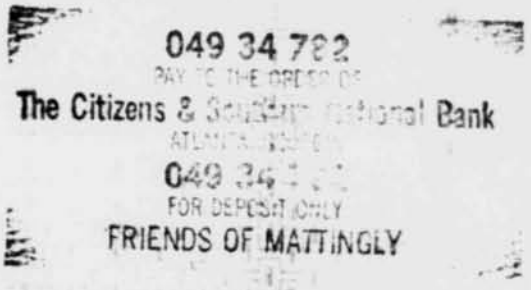
Sincerely,

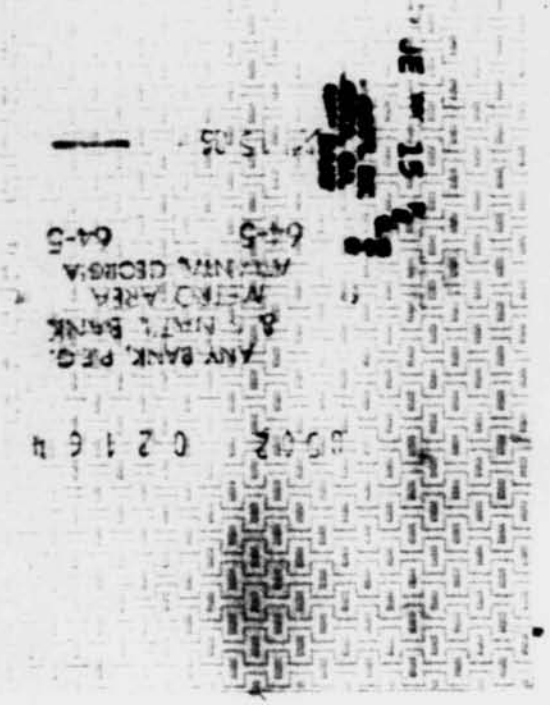
William A. Fickling, Jr.

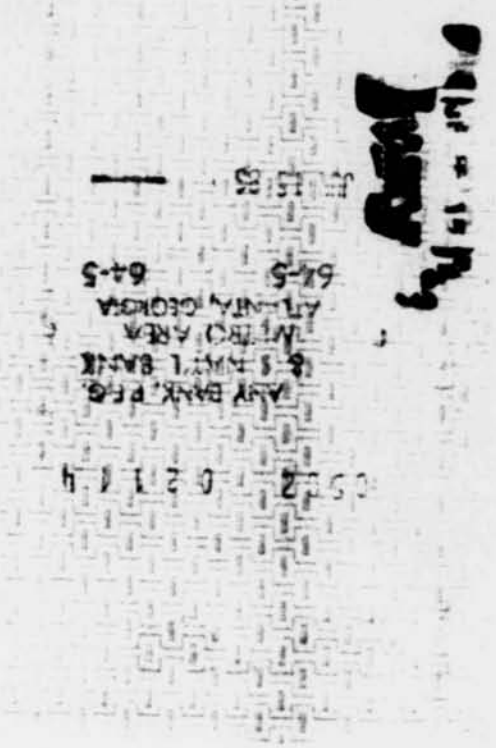
9304351509 9











9304351510 0

9304351510 1

Account Statement

THE CITIZENS AND SOUTHERN NATIONAL BANK H
PO BOX 4007, MACON, GA 31208

MR WM A FICKLING JR OR
MRS NEVA L FICKLING
PO BOX 209
MACON GA 31298

Statement Date	Customer Service	Items		
07/09/90		126DR	4CR	130

Beginning Balance + Deposits/Interest — Withdrawals/Charges = New Balance

9 3 0 4 3 5 | 5 | 0 2

C&S The Citizens and Southern National Bank Macon, Georgia

WM. A. FICKLING JR.
577 MULBERRY ST. P O BOX 209
MACON, GA 31298

15093

64-45
611

June 5, 19 85

PAY One thousand and no/100---------- DOLLARS | $ 1,000.00

TO THE ORDER OF Georgia Tribute to the President

contribution

Wm. A. Fickling Jr.

C&S The Citizens and Southern National Bank Macon, Georgia

WM. A. FICKLING JR.
577 MULBERRY ST. P O BOX 209
MACON, GA 31298

15094

64-45
611

June 5, 19 35

PAY One thousand and no/100---------- DOLLARS | $ 1,000.00

TO THE ORDER OF Georgia Tribute to the President

contribution

Wm. A. Fickling Jr.

OGC 7350

TROUTMAN, SANDERS, LOCKERMAN & ASHMORE
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
ATTORNEYS AT LAW
CANDLER BUILDING, SUITE 1400
127 PEACHTREE STREET, N.E.
ATLANTA, GEORGIA 30303-1810
404/658-8000
CABLE: MAESTRO
TELECOPIER: 404-221-0469

STANLEY H. HACKETT, P. C.

WRITER'S DIRECT DIAL NUMBER
404-658-8364

90 AUG -9 AM 10:34

August 7, 1990

90 AUG -9 PM 12:19
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Federal Election Commission
Office of General Counsel
Washington, D. C. 20463

Attention: Mr. Jeffrey Long

Re: Mr. J. Eliott Barrow
MUR 2989

Dear Mr. Long:

We are counsel to Mr. J. Eliott Barrow, the Respondent in the captioned Matter Under Review. A duly signed Statement of Designation of Counsel is attached to this letter.

Mr. Barrow received your letter dated July 20, 1990 on August 1, 1990. We understand that he has spoken with you by telephone and that you confirmed that the response date to your letter would be 15 days from his actual receipt of the letter.

The FACTUAL AND LEGAL ANALYSIS attached to your letter reflects that two contributions are in question - one on 10/21/86 in the amount of $2,000, and a second on 12/15/86 in the amount of $1,500. Mr. Barrow advises that the $2,000 contribution was not made by him. We understand that during a telephone conversation with Mr. Barrow, you double-checked the records and confirmed that this contribution was not made by him and is no longer in question. If we are incorrect in our understanding, please let us know.

On its face, the $1,500 contribution appears to exceed the limits of 2 U.S.C. §441 a(a)(1)(A). The contribution was made in response to a request from former Senator Mattingly's Campaign to assist in paying off debts incurred during the Campaign. At the time the contribution was made, Mr. Barrow believed it was proper and that it would be handled properly by the Campaign. Mr.

2304351503

Barrow is a semi-retired businessman, age 69. He is not an attorney, nor is he well-versed in the intricacies of Federal Election Laws. The mistake made was truly innocent, and he would like to rectify the matter as soon as possible.

We request an opportunity for pre-probable cause conciliation. I would appreciate your contacting me at 404-658-8364 to discuss this matter further.

Respectfully submitted,

TROUTMAN, SANDERS, LOCKERMAN & ASHMORE

Stanley H. Hackett

SHH:bjs

Attachment

cc: Robert H. Forry, Esquire
Mr. J. Eliott Barrow

Enclosure

9304351504

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Stanley H. Hackett and Robert H. Forry

ADDRESS: Troutman, Sanders, Lockerman & Ashmore
Candler Building, Suite 1400
127 Peachtree St., N.E.
Atlanta, Georgia 30303-1810

TELEPHONE: 404-658-8364

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.

8/7/90
Date

J. Eliott Barrow
Signature

RESPONDENT'S NAME: J. Eliott Barrow

ADDRESS: 280 Burch Lake Road
Fayetteville, GA 30214

HOME PHONE:

BUSINESS PHONE:

9304351510 5

LGE 357

Emory Winship
13 Peninsula Dr
Stratham, NH
03885

7 August 1990

90 AUG -9 PM 12:21

Federal Election Commission
Washington, D C 20463

Re: MUR 2989 Emory Winship

Attn: Elizabeth Campbell

Dear Sirs

In furtherance to my conversation with Ms Campbell of this date, I am writing to request pre-probable cause conciliation in this matter.

As stated in my previous correspondence, I have received my unlocked program and have been able to check my records for the years 1985 and 1986. I do not have the records for 1983 with me here, but I believe that your records, according to my memory, are correct. Those for which I do have records are exactly as you have shown. I do not have the cancelled checks here, but I am certain that no notations were made on them.

This violation was entirely inadvertant, and was a result of not understanding the law. Now, however, that I do, I will see to it that you won't be contacting me in the future - at least not about anything like this.

Sincerely yours,



9304351506

RECEIVED
FEC MAIL CENTER

90 JUL 31 A 11:17

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the matter of)
) MUR 2989
Friends of Mattingly et al.)

GENERAL COUNSEL'S REPORT

On June 19, 1990, the Commission found reason to believe that Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), 441b(a), and 11 C.F.R. § 110.6(c)(3); 17 political committees violated 2 U.S.C. § 441a(a); and 55 corporate entities violated 2 U.S.C. § 441b(a). On that same day the Commission also found reason to believe that 72 individuals who contributed more than twice the legal limit violated 2 U.S.C. § 441a(a)(1)(A). After looking over the report in this matter, the Audit Division pointed out to staff from this Office that two additional individuals not named as respondents contributed more than the legal limit to Friends of Mattingly. Mr. Winburn E. Stewart made excessive contributions totaling $1,125.00 in the primary election[1] and Mr. Charles B. West made excessive contributions totaling $2,000 in the general election[2]. In order to maintain consistency in the Commission's handling of this matter, this Office recommends that the Commission find reason to believe that these two individuals violated 2 U.S.C. § 441a(a)(1)(A).

9304351507

1. See final audit report, attachment 1, page 31.

2. See final audit report, attachment 1, page 34.

RECOMMENDATIONS

1. Find reason to believe that Winburn E. Stewart violated 2 U.S.C. § 441a(a)(1)(A).

2. Find reason to believe that Charles B. West violated 2 U.S.C. § 441a(a)(1)(A).

3. Approve the attached Factual & Legal Analyses.

4. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 7/30/90

BY: Lois G. Lerner
Associate General Counsel

Attachments:
1. Factual & Legal Analyses (2)

Staff assigned: Elizabeth Campbell

2304351508

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2989
Friends of Mattingly et al.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 3, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2989:

1. Find reason to believe that Winburn E. Stewart violated 2 U.S.C. § 441a(a)(1)(A).

2. Find reason to believe that Charles B. West violated 2 U.S.C. § 441a(a)(1)(A).

3. Approve the Factual & Legal Analyses, as recommended in the General Counsel's Report dated July 30, 1990.

4. Approve the letter, as recommended in the General Counsel's Report dated July 30, 1990.

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

Attest:

8-6-90
Date

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

Received in the Secretariat: Tuesday, July 31, 1990 11:17 a.m.
Circulated to the Commission: Thursday, Aug. 1, 1990 11:00 a.m.
Deadline for vote: Friday, Aug. 3, 1990 11:00 a.m.

dh

9304351509

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 9, 1990

Mr. Charles B. West
3340 Peachtree Rd., N.E.
Atlanta, GA 30026

RE: MUR 2989
Charles B. West

Dear Mr. West:

On August 3, 1990, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), 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 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.

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.

9304351510

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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

2304351111

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Charles B. West MUR 2989

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Charles B. West made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $2,000 for the 1986 Republican U.S. Senate General election in Georgia. Information on these contributions is presented below:

General Date	Total Contributed for the General	Total Excessives in the General
11/4/86	$1,000 - 8/19/86 $2,000 - 9/01/86	$2,000

Because these contributions were for the general election, they exceed the contribution limitations of the Act by $2,000. Therefore, there is reason to believe that Charles B. West violated 2 U.S.C. § 441a(a)(1)(A).

2304351512

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 9, 1990

Winburn E. Stewart, Jr.
P.O. Box 929
Macon, GA 31202

RE: MUR 2989
Winburn E. Stewart, Jr.

Dear Mr. Stewart:

On August 3, 1990, the Federal Election Commission found that there is reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), 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 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.

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.

2304351513

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 Jeffrey Long or Elizabeth Campbell, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lee Ann Elliott

Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form

2304351114

2304351515

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Winburn E. Stewart, Jr. MUR 2989

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that Winburn E. Stewart, Jr., made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,125 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$1,000 - 2/24/86 $ 25 - 5/29/86 $ 100 - 7/07/86 $1,000 - 7/10/86	$1,125

Because these contributions were for the primary election, they exceed the contribution limitations of the Act by $1,125. Therefore, there is reason to believe that Winburn E. Stewart, Jr., violated 2 U.S.C. § 441a(a)(1)(A).

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 10, 1990

John M. Stuckey, Jr.
Glass, McCullough, Sherrill & Harrold
1409 Peachtree Street, N.E.
Atlanta, Georgia 30309

RE: MUR 2989
John M. Stuckey, Jr.

Dear Mr. Stuckey:

This is in response to your letter dated July 30, 1990, which we received on August 8, 1990, requesting an extension of 30 days until September 7, 1990 to respond. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 7, 1990.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

9304351116

OGC 7375

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG 10 AM 11:07

LAW OFFICES
TROTTER SMITH & JACOBS
A Professional Corporation

400 Colony Square
1201 Peachtree Street
Atlanta, Georgia 30361
(404) 881-0500

Telecopier 872-1110

Michael V. Coleman
Direct Dial (404) 881-3918

20 Technology Parkway
Norcross, Georgia 30092
(404) 441-7900

Telecopier 448-6548

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 10 PM 3:41

August 7, 1990

Ms. Elizabeth Campbell
Federal Elections Commission
Office of the General Counsel
9999 E Street
Washington, D.C. 20463

Re: MUR 2989
R. M. Channell

Dear Ms. Campbell:

Pursuant to our telephone conversation, I am writing to confirm that the time period for responding to the July 20, 1990, letter from your office with respect to the above-referenced matter has been extended until August 17, 1990. We appreciate your cooperation, and look forward to working with you to resolve this matter.

Best regards.

Sincerely,

Michael V. Coleman

MVC/fb

cc: R. M. Channell

2042MVC.wrd

2304351117

MUR 2989

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 AUG 10 AM 11:19

CHILDRESS KLEIN PROPERTIES

August 8, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 AUG 10 PM 3:37

Ms. Elizabeth Campbell
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

RE: MUR 2989

Dear Ms. Campbell:

I have received your July 20 letter citing an apparent violation of the Federal Election Campaign Act of 1971 wherein I contributed $2,250.00 on May 15, 1985 to the campaign of Mack Mattingly.

At the time I made the contribution I was not aware of a restriction of $1,000.00 for each election in a federal election. Being a resident of the state of Georgia, I was under the impression that the federal election law was the same as that in Georgia in that an individual could give an unlimited amount of campaign contribution to a candidate for office. My assumption was obviously wrong, and I have indeed apparently violated the Federal Election Campaign Act. My check was made payable to "Georgia's Tribute to the President". As I have stated previously, I knew that the money would be going to the campaign for Mack Mattingly, but I did not knowingly violate the federal law. Given my ignorance of the law, I make no excuses but do ask for leniency in that I simply made a mistake.

I would appreciate any consideration that you would give me.

Very truly yours,

J. Donald Childress

J. Donald Childress
Managing Partner

JDC/ljp

999 PEACHTREE STREET, N.E.
SUITE 2000
ATLANTA, GA 30309
(404) 870-2400
FAX (404) 870-2399

9304351518

06C7392

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 AUG 13 PM 12:44

August 8, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 AUG 13 PM 2:43

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RE: MUR 2989
J & W FARMS

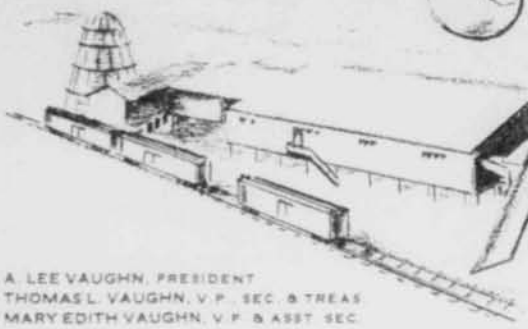
TO WHOM IT MAY CONCERN:

In response to your letter of August 3, 1990, I am informing you that J & W FARMS is not now and has never been registered as a corporate entity.

Sincerely,

Wayne Durrence

9304351519



Vaughn Lumber Company

A. LEE VAUGHN, PRESIDENT
THOMAS L. VAUGHN, V.P., SEC. & TREAS.
MARY EDITH VAUGHN, V.P. & ASST. SEC.

P.O. BOX 31 FORSYTH, GEORGIA 31029

912-994-2316 912-994-6738

90 AUG 13 PM 12:43

August 8, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 13 PM 2:43

23043515120

Ms. Elizabeth Campbell
Federal Election Commission
Washington,
D.C. 20463

Re: MUR 2989
Vaughn Lumber Company

Dear Ms. Campbell:

In regard to our telephone conversation today, and your letter of August 3, 1990, I am attaching a copy of our check which was made out to Georgia Tribute to the President.

After receiving your letter, and locating this old check, I note that it was endorsed by Friends of Mattingly.

As I told you on the phone, it is hard to remember that far back, but to the best of my knowledge, at the time I wrote the check, I thought it was going toward some programs of the President, not to Mack Mattingly.

If you need any further information, please let me know.

Sincerely,

A. Lee Vaughn

A. Lee Vaughn
President

ALV/law

Attach

VAUGHN LUMBER COMPANY
MANUFACTURERS OF
SOUTHERN PINE AND HARDWOOD LUMBER
P. O. BOX 31
FORSYTH, GA 31029

31128

May 24 85

64-261
611

PAY TO THE ORDER OF GEORGIA TRIBUTE TO THE PRESIDENT $ 250.00

VAUGHN LUMBER CO. 250 DOLS 00 CTS DOLLARS

MONROE COUNTY BANK
FORSYTH, GEORGIA 31029

FOR Donation By: P. Lee Vaughn

⑈031501⑈ ⑆061000146⑆ 15932283⑈

⑈031501⑈ ⑆061000146⑆ 15932283⑈

PAY ANY BANK
ATLANTA FRB 061000146
GUAR $1000 16 06-04-85

049 34 782
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GEORGIA

049 34 782
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY

JE 01
ATLANTA GA.

JUN 1 85

PAY ANY BANK REG.
C & S NATIONAL BANK
ATLANTA AREA
ATLANTA, GEORGIA
64-5

64-5

0262 485 20

9 3 0 4 3 7 5 1 2 1

OGC 7399

Century 21
COOK REALTY, INC.
108 South Thornton Avenue
Post Office Box 926
Dalton, Georgia 30722-0926
(404) 278-2115

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON
90 AUG 13 PM 12:18

MUR 2989

August 8, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 13 PM 2:44

Ms. Elizabeth Campbell
Federal Election Commission
999 "E" Street, N.W.
Washington, D.C. 20463

Dear Ms. Campbell:

Thank you so much for returning my telephone call today and for providing me with information that the check in question was written on May 24, 1985.

However, I have been through all my cancelled checks for the month of May 1985 and find there were no checks written to any political candidate or organization.

I then checked through my personal records and found that I had written a $125.00 check on May 31, 1985 and am attaching a copy of this for you records.

Should you be able to provide me with a copy of the check I was supposed to have written on my corporate account, or even the check number, I will be most happy to go back and look again.

Please advise as to what I should do now or the disposition of this matter. Thank you.

Very truly yours,

Yvonne Otts

Yvonne Otts
BROKER/OWNER

Attachment

2304351512 2

The Citizens and Southern National Bank
Dalton, Georgia

435

YVONNE OTTS
P O BOX 926
DALTON, GA 30720

64-152
611

May 31 19 85

Pay to the Order of Georgia Tribute to the Presidents 125.00

One Hundred Twenty Five and No/100 — **Dollars**

For

Yvonne Otts

930435151123

PAID

049 34 782

The Citizens and Southern National Bank

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 14, 1990

Michael V. Coleman, Esquire
Trotter Smith & Jacobs
400 Colony Square
1201 Peachtree Square
Atlanta, GA 30361

RE: MUR 2989
R.M. Channell

Dear Mr. Coleman:

This is in response to your letter dated August 7, 1990, which we received on August 10, 1990, requesting an extension until August 17, 1990 to respond. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on August 17, 1990.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

2304351512 4

OGC 7418

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 AUG 14 AM 10: 13

LJ&C

LEX JOLLEY & CO., INC.
MUNICIPAL AND CORPORATE SECURITIES
Member S.I.P.C

TELEPHONE
(404) 525-1859
FAX (404) 525-3048

LEX JOLLEY
GORDON MORTIN
ED WALL

August 7, 1990

Ms. Elizabeth Campbell
Office of General Counsel
999 E Street, N.W.
Washington, DC 20463

Re: MUR 2989
Lex Jolley & Company, Inc.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 14 PM 12: 45

9304351512 5

Dear Ms. Campbell:

In relation to the above, enclosed are copies of the unused/returned check and Senator Mattingly's letter that was enclosed with the returned check.

Lex Jolley & Co., Inc. is a small, family-owned company. Each of the stockholders have personal accounts on our company books. It is not unusual for us to pay personal bills of the stockholders with company checks and debit the amount of the check to the personal account of the respective party.

On November 12, 1985, I sent a corporate check for what was a personal contribution. Unfortunately, I did not think about the connection that would be made between a corporate check and the Federal Campaign Finance Law, but Senator Mattingly's campaign staff realized that the check was a corporate check and returned it on November 26, 1985. Since all of this happened in the month of November, 1985 before I closed my books for the month, this check was never credited to a personal account on our books, but the check was simply voided as shown on the attached copy.

I submit this statement to you under oath.

Sincerely yours,

Malinda J. Mortin

Malinda J. Mortin
Secretary/Treasurer

MJM/km

MACK MATTINGLY
FRIENDS OF MACK MATTINGLY CLUB

November 26, 1985

Mr. Gordon K. Mortin
Lex Jolley & Company, Inc.
300 William-Oliver Building
Atlanta, Georgia 30303

Dear Mr. Mortin:

Thank you for your contribution of $500 to Senator Mattingly's re-election campaign. The Senator appreciated your support very much.

Unfortunately, a provision in the Federal Election Commission (FEC) law prohibits contributions drawn on corporate funds. Therefore, we are enclosing your check in order that it might be replaced with a check drawn on your personal bank account.

I apologize for any inconvenience that this has caused you.

Sincerely,

Charlotte Miller
FRIENDS OF MATTINGLY

9304351126

PAID FOR BY FRIENDS OF MATTINGLY

LEX JOLLEY & CO. INC.
300 WILLIAM-OLIVER BLDG.
ATLANTA, GA 30309

28890

64-5
610

November 12 19 85

PAY TO THE ORDER OF FRIENDS OF MATTINGLY $ 500.00

L J Co. Fib 500 AND 00 CTS DOLLARS

C&S The Citizens and Southern National Bank
Atlanta, Georgia

FOR

Mrs. Mal[illegible] T. Morton

⑈0028890⑈ ⑆061000653⑆ 930435151 27

OGC 7424

LAW OFFICES
TROTTER SMITH & JACOBS
A Professional Corporation

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG 14 AM 10:27

400 Colony Square
1201 Peachtree Street
Atlanta, Georgia 30361
(404) 881-0500

Telecopier 872-1110

Michael V. Coleman
Direct Dial (404) 881-3918

HAND DELIVERED

20 Technology Parkway
Norcross, Georgia 30092
(404) 441-7900

Telecopier 448-6548

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 14 PM 12:46

August 13, 1990

VIA FEDERAL EXPRESS

Ms. Elizabeth Campbell
Federal Elections Commission
Office of General Counsel
999 East Street
Washington, D.C. 20463

Re: MUR 2989
R. M. Channell

Dear Ms. Campbell:

Pursuant to our telephone conversation, I enclose an original and one copy of a Statement of Designation of Counsel which has been executed by R. M. Channell in connection with the above-referenced matter. We look forward to working with you to resolve this matter.

Sincerely,

Michael V. Coleman

MVC: mjm

Enclosures

2048mvc.wrd

2304351528

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Michael V. Coleman

ADDRESS: Trotter Smith & Jacobs
1201 Peachtree Street, Suite 2200
Atlanta, Georgia 30361

TELEPHONE: (404) 881-0500

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.

7-26-90
Date

R.M. Chennell
Signature

RESPONDENT'S NAME: R.M. Chennell

ADDRESS: 104 North St
Greensboro, GA 30642

HOME PHONE:

BUSINESS PHONE: 404-453-2203

9304351129

OGC 7420

Independent Freight Forwarders and Customs Brokers Association

of Savannah, Inc.

POST OFFICE BOX 1465

SAVANNAH, GEORGIA 31402

Federal Election Commission
Washington, D.C. 20463

RE: MUR 2989

Dear Sirs,

We write in reference to your letter of August 3, 1990 concerning a possible violation of the Federal Election Campaign Act of 1971 by the Independent Freight Forwarders & Customs Brokers Assoc. of Savannah, Inc. We intend to cooperate fully with your investigation and wish to pursue a pre-probable cause conciliation to expedite handling of this matter.

Our organization is a professional association of member firms of the local custom house brokerage and freight forwarding industry. The objectives of our association are to further the interests of our industry, encourage professionalism and integrity, and maintain goodwill among our members. We hold monthly meetings to conduct our business and elect our officers annually. As none of the officers of 1984 are currently involved with our association we have consulted bank records and minutes of our meetings to determine circumstances of the alleged contribution. We have found that our association sent two representatives to a reception in honor of Mack Mattingly at the Hyatt Regency Hotel in Savannah, Ga. on March 16, 1984. The cost of the function was $500.00.

As our organization has become more politically active we have become more famaliar with laws governing contributions on the state and federal level. Our association is much more attuned to its responsibilities in this regard and follows them accordingly. We hope the information provided above will assist you in your investigation and allow for a quick resolution to this matter. If we can be of further help please contact the undersigned.

Sincerely yours,

Gerald J. Bresnihan
Treasurer
912-233-8402

CC: Gloria Faircloth
President

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 14 PM 12:46

90 AUG 16 AM 9:57

9304351530

REGULAR MAIL
AUG 09 1990

RECEIVED
OFFICE OF RECORDS & REGISTRATION
1990 AUG 14 AM 7:50
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

MUR 2989

August 9, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 14 PM 2:17

Ms. Elizabeth Campbell
Federal Electionn Commission
1036 Longworth House Office Building
Washington, DC 20515-6612

RE: MUR2989, Alfred Hammack d/b/a

Dear Ms. Campbell,

In 1978 I built a 9000 square foot office building at Hammack's Southlake Junior Shopping Center. This building was financed through a new lender and as a result I had to have a separate bank account. For a two (2) month period I had a partner on this project which was terminated after a three (3) month period. A letter was sent to the Secretary of State dissolving that partnership. From that period I operated as an individual using the bank account Alfred Hammack dba Morrow Professional Building as a title only. I never petitioned the Secretary of State for an extension for a corporation and paid no fees or assessments after the initial fee.

I at no time made a contribution or a donation to any candidate State or Federal, that I wasn't assured that I was in compliance with regulations.

Yours truly,

Alfred Hammack

Alfred Hammack
221 Upper Riverdale Road, Apt. 5-E
Jonesboro, GA 30236

9304351513 1

06C7411

MARICOM ELECTRONICS, INC.

ELECTRONIC SALES AND SERVICE

P.O. BOX 14287 SAVANNAH, GA. 31416

(912) 354-4542

Federal Election Commission
Washington, D.C. 20463

August 9, 1990

RE: MUR 2989, Maricom Electronics, Inc.

Dear Lee Ann Elliott,

You are correct in stating that a Maricom Electronics, Inc. check was used to make a contribution of $150.00 to Matt Mattinglys Senatorial Campaign. I am president of this corporation and this amount of money was to have been charged to my personal account. I have instructed our accountant to check and be sure that this was done.

For your further information this corporation is controlled by five equal parteners and we have never supported or made a contribution to any political party or candidate.

Sincerely,

Bill Willingham

Bill Willingham
President

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 14 AM 10: 39

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG 13 PM 5: 09

9304351513 2

OGC 7437

LEPAC

August 14, 1990

Ms. Lee Ann Elliott
Chairman
Federal Election Commission
Washington, DC 20463

RE: MUR 2989
Lockheed Employees' PAC and
Stephen E. Chaudet, as treasurer

Dear Ms. Elliott:

This letter sets forth the facts and circumstances surrounding contributions to Friends of Mattingly by the Lockheed Employees' PAC from March, 1982 through February, 1986. According to our records we did not violate 2 U.S.C. Sec. 441a(a)(2)(A) in either the primary or general election cycle.

Attached please find copies of checks and associated letters sent to Friends of Mattingly. Please recognize that we have gone to great lengths to re-create our contribution history and have included information that dates back further than the FEC record-keeping requirements. A summary of the attachments is provided below:

Check Date	Amount	Designation
3-3-82	$ 500	None (Letter unavailable)
10-6-83	$ 500	None
11-18-83	$1,000	None
2-8-85	$1,000	None
2-13-85	$1,000	None
5-15-85	$ 500	None
* 6-7-85	$1,000	$500 Primary $500 General
2-26-86	$4,500	General

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 15 PM 12:03

9304351513 3

Lockheed Employees Political Action Committee
4500 Park Granada Boulevard • Calabasas, CA 91399-0610 • (818) 712-2461

From 3-3-82 to 5-15-85 our operating assumption under 11 C.F.R. Sec. 110.2 was that these contributions were for the primary election; clearly we did not intend for the candidate to have to hold the checks for several years until the general election cycle began. Note in particular our contributions on 6-7-85: here we reached the $5,000 limit for the primary cycle and clearly indicated the split between primary and general on both the check and the letter. In sum, our records show no excess contribution in either the primary or general cycle.

Note also that I recall a great deal of confusion in the early 1980's over the issue of designating funds. Indeed, I believe that the FEC held a nationwide series of meetings to discuss this issue.

Given these facts, and after discussions with Elizabeth Campbell, I respectfully request that the Commission close the file on this MUR. If the Commisssion is not inclined to do this, I ask that we pursue pre-probable cause conciliation. Please contact me on (818) 712-2450 or Bob Cannon (818) 712-2461 if you require additional information.

Sincerely,

Stephen E. Chaudet

Stephen E. Chaudet
Treasurer, Lockheed
Employees' PAC

SEC:rp

cc: Ms. Elizabeth Campbell
Office of the General Counsel

9304351513 4

ACTION COMMITTEE

№ 0290

16-4
1220

10-6 19 83

Friends of Mattingly Committee $ 500.00

Five Hundred and no/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Burbank Office #0122
142 E. Olive Ave., Burbank, CA 91502

S. E. Chaudet

"000290" ⑆122000043⑆ 122-117185"

Senator Mack Mattingly
Friends of Mattingly Committee
P. O. Box 2997
Main Post Office
Washington, D. C. 20013

Dear Senator Mattingly:

The 3000 members of the Lockheed Political Action Committee wish to express appreciation for your outstanding record of public service.

Along with the enclosed check for $500, we send our best wishes.

Sincerely,

Stephen E. Chaudet

Stephen E. Chaudet
Treasurer

me

Enclosure

930435-51-35

#323

Nov. 19 83

164
1220

PAY TO THE ORDER OF Friends of Mattingly $ 1,000.00

One thousand and no/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Burbank Office #0122
142 E. Olive Ave., Burbank, CA 91502

FOR S. E. Chaudet

⑈000323⑈ ⑆122000043⑆ 122⑈117185⑈

Senator Mack Mattingly
Friends of Mattingly
P. O. Box 2997
Main Post Office
Washington, D. C. 20013

Dear Senator Mattingly:

The 3000 members of the Lockheed Political Action Committee wish to express appreciation for your outstanding record of public service.

Along with the enclosed check for $1,000 we send our best wishes.

Sincerely,

Stephen E. Chaudet
Treasurer

me

Enclosure

9304351513 6

Do Lee

OCKHEED POLITICAL ACTION COMMITTEE

No 0727

727

16-4
1220

Feb. 8 19 85

PAY TO THE ORDER OF FRIENDS OF MATTINGLY COMMITTEE $ 1,000.00

****ONE THOUSAND AND NO/100**** DOLLARS

SECURITY PACIFIC NATIONAL BANK
Burbank Office #0122
142 E. Olive Ave., Burbank, CA 91502

FOR Fundraiser 2/21/85

Jean V. Horwatt

"000727" 1:122000043:122 117185"

January 31, 1985

The Honorable Mack Mattingly
Friends of Mattingly Committee
Post Office Box 2997
Main Post Office
Washington, D. C. 20013

Dear ~~Congressman~~ Senator Mattingly:

The 3000 members of the Lockheed Political Action Committee wish to express appreciaton for your outstanding record of public service.

Along with the enclosed check for $1000 we send our best wishes.

Sincerely,

Jean V. Horwatt

Jean V. Horwatt
Assistant Treasurer

JVH:me

attachment

930435151137

LOCKHEED POLITICAL ACTION COMMITTEE

№ 0733

16-4
1220

February 13 19 85

PAY TO THE ORDER OF Friends of Mattingly $ 1000.00

One Thousand and no/100 DOLLARS

SECURITY PACIFIC NATIONAL BANK
Burbank Office #0122
142 E. Olive Ave., Burbank, CA 91502

FOR 02/18/85 GA

Jean V. Horwatt

"000733" ⑆122000043⑆ 22" 17185"

The Honorable Mack Mattingly
Friends of Mattingly
P. O. Box 2997
Main Post Office
Washington, D. C. 20013

Dear Senator Mattingly:

The 3000 members of the Lockheed Political Action Committee wish to express appreciation for your outstanding record of public service.

Along with the enclosed check for $1000, we send our best wishes.

Sincerely,

Jean V. Horwatt

Jean V. Horwatt
Assistant Treasurer

JVH:me

attachment

930435151538

LOCKHEED POLITICAL ACTION COMMITTEE

№ 0801

16-4
1220

May 15 19 85

PAY TO THE ORDER OF FRIENDS OF MATTINGLY COMMITTEE $ 500.00

****FIVE HUNDRED AND NO/100**** DOLLARS

SECURITY PACIFIC NATIONAL BANK
Burbank Office #0122
142 E. Olive Ave., Burbank, CA 91502

FOR 5/18/85

Jean V. Horwatt

⑈000801⑈ ⑆122000043⑆122⑈ 17185⑈

May 17, 1985

The Honorable Mack Mattingly
Friends of Mattingly Committee
Post Office Box 2997
Main Post Office
Washington, D. C. 20013

Dear Senator Mattingly:

The 3000 members of the Lockheed Political Action Committee wish to express appreciation for your outstanding record of public service.

Along with the enclosed check for $500, we send our best wishes.

Sincerely,

Jean V. Horwatt

Jean V. Horwatt
Assistant Treasurer

JVH:me

attachment

2304351539

LOCKHEED POLITICAL ACTION COMMITTEE

№ 0837

6-7 19 85

10-4
1220

PAY
TO THE
ORDER OF The Georgia Tribute to the President | $ 1000.00

****One Thousand and no/100****

DOLLARS

SECURITY PACIFIC NATIONAL BANK
Burbank Office #0122
142 E. Olive Ave., Burbank, CA 91502

FOR $500 primary election, $500 general election

Jean V. Horwatt

⑈000837⑈ ⑆122000043⑆122⑈117185⑈

June 7, 1985

The Honorable Mack Mattingly
The Georgia Tribute to the President
c/o Friends of Mattingly Committee
PO Box 1986
Atlanta, GA 30301-990

Dear Senator Mattingly:

The 3000 members of the Lockheed Employees' Political Action Committee wish to express appreciation for your outstanding record of public service.

Along with the enclosed check for $1,000, we send our best wishes. Our contribution is designated as follows: $500 for the primary election and $500 for the general election.

Sincerely,

Jean V. Horwatt

Jean V. Horwatt
Assistant Treasurer

JVH:me

Attachment

cc: S. E. Chaudet
Barbara Rogan

2304351514O

LOCKHEED GOOD GOVERNMENT PROGRAM
BOX 551 • BURBANK, CALIFORNIA • 91520

February 26, 1986

The Honorable Mack Mattingly
Friends of Mattingly Committee
P.O. Box 2997
Main Post Office
Washington, D.C. 20013

Dear Senator Mattingly:

The 3000 members of the Lockheed Employees' Political Action Committee wish to express appreciation for your outstanding record of public service. Our contribution is designated for the general election.

Along with the enclosed check for $4,500, we send our best wishes.

Sincerely,

Jean V. Horwatt

Jean V. Horwatt

930435151 41

LOCKHEED POLITICAL ACTION COMMITTEE

No 1033

16-4
1220

Feb. 25 19 86

PAY TO THE ORDER OF FRIENDS OF MATTINGLY COMMITTEE $ 4,500.00

****FOUR THOUSAND FIVE HUNDRED AND NO/100**** DOLLARS

SECURITY PACIFIC NATIONAL BANK
Burbank Office #0122
142 E. Olive Ave., Burbank, CA 91502

FOR Contribution for general election

Jean V. Horwatt

⑈001033⑈ ⑆122000043⑆122⑈ 117185

OGC 7449

SIMMONS & McANDREWS
ATTORNEYS AND COUNSELORS AT LAW
1441 FOURTH STREET
SANTA MONICA, CALIFORNIA 90401

(213) 458-1405
FAX (213) 394-4028

COLLEEN CONWAY MCANDREWS
JERRY MARGARET SIMMONS

90 AUG 15 AM 10:08

August 9, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 15 PM 12:05

Jeffrey Long, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 2989

Dear Mr. Long:

Enclosed for your records please find a Statement of Designation of Counsel completed by the Northrop Employees PAC representative authorizing me to act as their counsel in connection with MUR 2989.

I have received your letter dated July 31, 1990 in which you have granted an extension of time to respond. We appreciate your courtesy in this matter.

Sincerely yours,

Jerry Margaret Simmons

JMS/dm

Enclosure

2304351512

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jerry Simmons

ADDRESS: Simmons & McAndrews
1441 Fourth Street
Santa Monica, CA 90401

TELEPHONE: (213) 458-1405

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.

August 8, 1990
Date

Lily Ring Balian
Signature
Lily Ring Balian on behalf of Northrop Employees PAC

RESPONDENT'S NAME: Northrop Employees Political Action Committee

ADDRESS: 1441 Fourth Street
Santa Monica, CA 90401

HOME PHONE: not applicable

BUSINESS PHONE: (213) 201-3421 (Ms. Balian)
(213) 458-1405 Nepac

2304351-51143

OGC 7465

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN W. BARAN
(202) 429-7330

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

August 15, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 15 PM 12:55

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

ATTN: Jeffrey Long

Re: MUR 2989

Dear Mr. Noble:

This office represents John Treacy Beyer, Marion R. Buisson, Frank F. Dineen, Carol Falcone, Jacob Jerigan, Claire A. King, Jane A. Miller, William A. Orender, John Roig, Dennis Schechter, and Harlen Zeitler in Matter Under Review 2989. Executed original Statements of Designation of Counsel are enclosed for John Treacy Beyer, Frank F. Dineen, Carol Falcone, Jacob Jerigan, Claire A. King, Jane A. Miller, William A. Orender, Dennis Schechter, and Harlen Zeitler. The two remaining executed originals will be forwarded to you as we receive them.

Sincerely,

Jan Witold Baran

Enclosures

cc: John Treacy Beyer
Marion R. Buisson
Frank F. Dineen
Carol Falcone
Jacob Jernigan
Claire A. King
Jane A. Miller
William A. Orender
John Roig
Dennis Schechter
Harlen Zeitler

2304351514

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Wiley, Rein & Fielding

ADDRESS: 1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

7-31-90
Date

Claire A. King
Signature

RESPONDENT'S NAME: Claire A. King

ADDRESS: 5505 Errol Place
Atlanta, GA. 30327

HOME PHONE:

BUSINESS PHONE:

9304351145

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

8/10/90
Date

Jacob S. Jernigan
Signature

RESPONDENT'S NAME: Jacob S. Jernigan

ADDRESS: 6459 Rico
Wichita, Kansas 67204

HOME PHONE:

BUSINESS PHONE: (316) 721-0207

2304351514 6

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

8/31/90
Date

Carol Falcone
Signature

RESPONDENT'S NAME: CAROL FALCONE

ADDRESS: P.O. Box 71 322 No. Rd.
Hope, RI 02831

HOME PHONE:

BUSINESS PHONE: (401) 944-1870

93043515147

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan Witold Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

7/25/90
Date

Signature

RESPONDENT'S NAME: John Treacy Beyer

ADDRESS: 353 Argonne Dr., NE
Atlanta, GA 30305

HOME PHONE:

BUSINESS PHONE: (404)564-5160

2304351148

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

7/27/90
Date

Jane A. Miller
Signature

RESPONDENT'S NAME: JANE A. MILLER

ADDRESS: 1350 DOGWOOD RD
SNELLVILLE, GA 30278

HOME PHONE:

BUSINESS PHONE:

9304351149

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

AUGUST 9, 1990
Date

Signature

RESPONDENT'S NAME: W. A. ORENDER

ADDRESS: 4887 ALPHA RD STE 290
DALLAS, TX 75244

HOME PHONE:

BUSINESS PHONE:

9304351550

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan Witold Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

7/30/90
Date

Signature

RESPONDENT'S NAME: Dennis Schechter

ADDRESS: Roconan Dr.
Mendham twp. N.J. 07945

HOME PHONE: N/A

BUSINESS PHONE: N/A

2304351551

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran, Esq.

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

8/10/90
Date

Harlen Zeutler
Signature

RESPONDENT'S NAME:

ADDRESS: Rt 3 Box 321 A
Pound Wis 54161

HOME PHONE:

BUSINESS PHONE:

2304351551552

OGC 7447

SELL & MELTON
ATTORNEYS AT LAW
FOURTEENTH FLOOR CHARTER MEDICAL BUILDING
POST OFFICE BOX 229
MACON, GEORGIA 31297-2899
TELEPHONE (912) 746-8521
TELECOPIER (912) 745-6426

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG 15 AM 10:33

August 14, 1990

Mr. Jeffrey Long
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 15 PM 12:05

RE: MUR 2989 Albert L. Luce, Jr.

Dear Mr. Long:

Mr. Luce has attempted to locate written evidence of the check dated November 1, 1983 which is referred to in a factual and legal analysis which was furnished to him by your office. As I told you, he has discarded his check stubs and his cancelled checks prior to 1985, so he has been unsuccessful in his quest. He has no present recollection of a 1983 donation.

However, he has located a check of his brother, George E. Luce, dated November 1, 1983 payable to "Friends of Mattingly", a copy of which is enclosed.

As I mentioned to you over the phone, George E. Luce died on July 5, 1990, so we are unable to assemble any additional information about his check. The two were brothers.

I am wondering if the audit may possibly have shown the contribution of George E. Luce on November 1, 1983 as a contribution from Albert L. Luce, Jr.

If you have a copy of a check from Albert L. Luce, Jr. dated November 1, 1983, please be good enough to furnish me with a copy.

9304351553

Even if this possible mix-up explains the contribution of $1,000.00 which the analysis states was made by Albert L. Luce, Jr. on 11/1/83, there still remains the question of an additional $300.00 contribution. Albert L. Luce, Jr., has no record of this. Bill Stewart of Gammon and Stewart, certified public accountants, 500 F Street, Brunswick, Georgia 31520, who apparently kept the books for the Mattingly campaign, tells us his available records show contributions of $200.00 on 11/1/83 and of $100.00 on 5/29/85 from George E. Luce. We are wondering if the audit is perhaps in error and that the $300.00 contributions made by George E. Luce were erroneously charged to Albert L. Luce, Jr.

I suppose that the bottom line of all of this confusion is that, if you have evidence that Albert L. Luce, Jr. made contributions totalling $2,300.00 to the August 12, 1986 primary, that we be provided with copies of this evidence.

As previously stated, Mr. Luce has a copy of his check dated May 22, 1985 which was deposited to the Mattingly campaign account in the amount of $1,000.00, so there is no question about this contribution. The question is about the contribution allegedly on November 1, 1983 and the $300.00 contribution to which no date has been ascribed.

Your assistance will be appreciated. I tried unsuccessfully to reach you by phone on Monday, but this letter will explain the purpose of my call.

Sincerely yours,

John D. Comer

JOHN D. COMER

JDC*b
enc.
cc: Mr. Albert L. Luce, Jr.

2304351564

LIST SOURCE OF DEPOSITS AND INFORMATION ABOUT
ENDORSEMENTS ON BACK OF PRECEDING ST UBS

GEORGE E. LUCE
512 WESTVIEW DRIVE
FORT VALLEY, GEORGIA 31030

9161

Nov. 7 19 83

PAY TO THE ORDER OF Friends of Mattingly $ 4,000.00

One thousand & no/100 DOLLARS

C&S The Citizens and Southern National Bank
Macon, Georgia

FOR

George E. Luce

⑆051550⑆ ⑆930435⑈

PAY TO THE ORDER OF
FIRST AMERICAN BANK
WASHINGTON, DC
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY
325754

PAID

** TOTAL PAGE.003 **

OGC 7440

DABBS, HICKMAN, HILL & CANNON
Certified Public Accountants
P.O. Box 727 • 319 South Main Street • Statesboro, Georgia 30458 • 912-764-6951 • FAX 912-764-8795

Members
American Institute of Certified
Public Accountants
Private Companies Practice Section
Georgia Society of Certified
Public Accountants

August 10, 1990

90 AUG 15 PM 12:04

Federal Election Commission
Washington, D.C. 20463

Dear Sirs:

Re: John C. Adams, Jr., P.C.

MUR 2989

The political contribution in question for the year ended December 31, 1986, was not in any way taken as a credit or as a deduction on the tax return for the corporation. This check was written on the corporate account because no personal account existed for Dr. John C. Adams, Jr. This check upon being written was then treated as a personal expense and added to the corporate shareholder's receivable account. This receivable account is periodically reimbursed by Dr. John C. Adams, Jr. It was solely a personal expenditure.

Please review the enclosed information and if this does not clarify this matter, please let us hear from you.

Very truly yours,

DABBS, HICKMAN, HILL & CANNON

Edwin G. Hill

EGH/bh

Enclosures

2304351156

JOHN C. ADAMS, JR.

STATEMENT REGARDING POLITICAL CONTRIBUTION

DR. JOHN C. ADAMS, JR., deposes and says that he is the president and sole shareholder of John C. Adams, Jr., P.C.

DR. JOHN C. ADAMS, JR., says that in October 1986, he did not have a personal checking account.

DR. JOHN C. ADAMS, JR., says that in October 1986, the corporation submitted a check as a political contribution on his behalf.

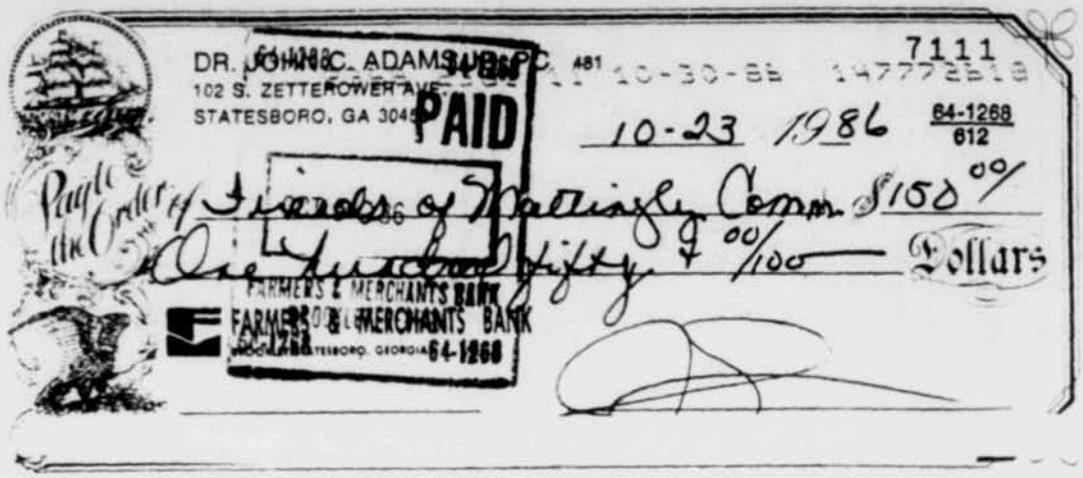
DR. JOHN C. ADAMS, JR., says that he was personally charged for this political contribution.

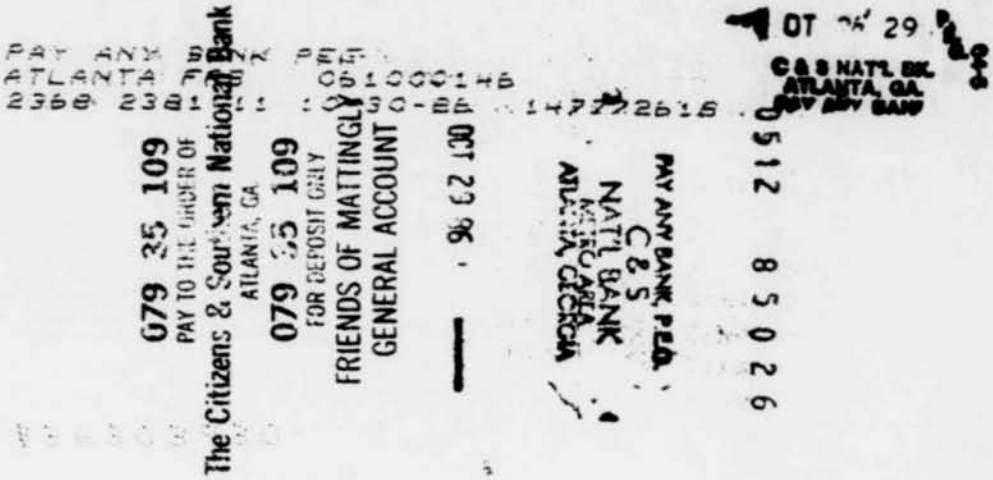
DR. JOHN C. ADAMS, JR., deposes and says that his political contribution was not taken as a credit or as a deduction on the corporate return for the year ended December 31, 1986.

DR. JOHN C. ADAMS, JR.

8/13/90
DATE

9304351157





930435151158

OGC 7460

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

August 15, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 16 AM 11:10

Elizabeth Campbell, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2989

Dear Ms. Campbell:

Thank you for taking the time to meet with us this morning to discuss the details of MUR 2989 as they affect our clients.

As we promised, please find enclosed the Designation of Counsel form for John Roig. I believe we still need to provide you with a Designation of Counsel form for Marion Buission. I will forward that to you as soon as we receive it.

Additionally, per our request today, I would appreciate it if you would send me copies of the following materials from your records:

1. Copies of checks #113 ($2,000) and #114 ($500) by John Treacy Beyer.

2. Copies of check #339 ($300) by Frank Dineen and the corresponding letter of allocation.

3. Copies of a check for $300 by Carol Falcone and the corresponding letter of allocation.

4. Copy of a check for $750 for Claire A. King.

5. Copies of checks #198 ($2,000) and #199 ($500) by Jane A. Miller.

9304351559

6. Copies of a check for $150 by John Roig and the corresponding letter of allocation.

Thank you for your cooperation in this matter.

Sincerely yours,

Jan W. Baran/kpb

Jan Witold Baran

9304351160

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

8/9/90
Date

John M. Roig
Signature

RESPONDENT'S NAME: John Roig

ADDRESS: 7200 Darby Lane
Parkland, FL 33067

HOME PHONE:

BUSINESS PHONE: 305-974-3372

9304351516

OGC 7458

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

August 16, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 16 AM 11:09

Elizabeth Campbell, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2989

Dear Ms. Campbell:

Enclosed please find the original, executed Designation of Counsel form for Marion R. Buisson which arrived just this morning via Federal Express.

Sincerely,

Robin Barbee

Mrs. Robin Barbee
Secretary to Jan W. Baran

Encl.

2304351562

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

8-14-90
Date

Marion R Brisson
Signature

RESPONDENT'S NAME: Marion R Brisson

ADDRESS: 2622 Old Dr
Snellville GA 30278

HOME PHONE:

BUSINESS PHONE:

2304351511663

OGC 1459

WILEY, REIN & FIELDING

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

TREVOR POTTER
(202) 429-7366

TELECOPIER
(202) 429-7049
TELEX 248349 WYRN UR

August 16, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 16 AM 11:10

Elizabeth Campbell, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2989

Dear Ms. Campbell:

Enclosed please find the original, fully executed, copy of the Designation of Counsel for Frank T. Dineen.

Thank you for your assistance with this matter.

Sincerely,

Trevor Potter

Encl.

2304351516 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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 7/21/90

Signature

RESPONDENT'S NAME: FRANK T. DINEEN

ADDRESS: 3206 Trowbridge
ALBANY GA 31707

HOME PHONE:

BUSINESS PHONE: 912 883 7822

9304351551165

MUR 2989

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 AUG 16 AM 11:12

Cathedral of Faith
C.O.G.I.C.

50th Anniversary Steering Committee

Church Office — (404) 752-8960

Dr. Jonathan Greer II, Pastor
Sis. Shirley Greer, First Lady
Sis. Louise Williams, Chairperson

Bro. Michael Allred
Bro. Michael Axen
Sis. Mary Barnwell
Bro. Curtis Baxter
Sis. Alice Bell
Bro. Mac Billings
Sis. Pat Billings
Bro. Robert Belton
Sis. Louise Bradfield
Sis. Dolores Briley
Bro. Von Brown
Sis. Sula Burr
Bro. Walter Cabassa
Bro. Maurice Culpepper
Sis. Consuela Cutright
Bro. Jimmy Davis
Sis. Sharon Fields
Bro. Robert Fisher
Sis. Clara Foster
Sis. Betty Freeman
Sis. Virginia Gilham
Sis. Faith Hairston
Sis. Barbara Hill
Bro. Bernard Houston
Sis. Arian Johnston
Sis. Barbara Kearse
Bro. Logan Kearse
Sis. Gloria Locke
Sis. Gayle McWhorter
Bro. James McWhorter Jr.
Sis. Stacey Neal
Sis. Mary Paden
Bro. Gerald Sanders
Sis. Lizzie Smith
Sis. Gemella Sullivan
Sis. Tina Trice
Sis. Jessie Wilcoxson
Sis. Elizabeth Williams
Sis. Edith Woodie

AUGUST 10, 1990

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

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 16 PM 12:41

Re: MUR 2989
Cathedral of Faith Church
of God In Christ

Dear Mr. Long,

Regarding a letter we received dated August 3, 1990 from Ms. Lee Ann Elliott, Chairman, Federal Election Commission, stating a reason to believe Cathedral of Faith Church of God In Christ violated 2 U.S.C. 441b(a), a provision of the Federal Election Campaign Act of 1971. We understand that ignorance of the law is no excuse. Cathedral of Faith Church of God In Christ acknowledges making this donation to the campaign re-election of then Senator Matt Mattingly. Although we did not know then as we do now that our actions are a violation, please know that our intentions were honorable and sincere and not meant to violate any law.

As best as we can remember, we were approached by the Mattingly Campaign Office to solicit volunteers to help in his campaign in Southwest Atlanta. The volunteers' task were to distribute campaign literature and receive donations from persons who wish to contribute. These contributions totaled $150.00 and were freely given by the general public. As a result, one check was given as the donations were cash in various denominations of money.

1940 - 1990
Our 50th Anniversary

1137 Avon Avenue, S.W. Atlanta, Georgia 30310

As a church, we regret what our actions has caused. Although our motives and purpose was trying to assist in the civil affairs of our immediate community, we can now see how we erred. We respectively request that the Federal Elections Commission will forgive us for this oversight.

Thank you for every consideration.

Sincerely,

Dr. Jonathan Greer II, Pastor
Administrative Assistant
CATHEDRAL OF FAITH C.O.G.I.C.

/gas

9304351567

OGC 7472

BILL WALKER & ASSOCIATES

August 8, 1990

Mr. Jeffrey Long
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 16 AM 10:55 90 AUG 16 PM 12:41

RE: MUR2989, Bill Walker & Associates. Alleged Violations of the Federal Election Campaign Act of 1971

Dear Mr. Long,

Thanks very much for your returned telephone call regarding this case. Attached is an explanation of my situation. I hope you will find this explanation in order.

1. Bill Walker & Associates is a 100% wholly owned corporation owned by myself.

2. This business was a proprietorship using my only personal checking account for business purposes but was later turned into a corporation. The checking account was then placed into the corporate use before I opened a personal account. I did not think I needed an account as my wife's account was generally used for household purposes. I tried to handle the few financial matters of my own by issuing corporate checks and charging my personal reimbursement account within corporate books. I later saw that my personal check writing was more than I had predicted, recognized the impracticality of this system and opened a personal account; not before this incident, however.

3. For a period of time after the transition to a corporation certain personal bills were paid with corporate checks from my old checking account then being used for corporate purposes. Our internal accounting staff was instructed to reimburse the corporation from my personal account for any corporate checks written for personal expenses. This was done internally and later reviewed and confirmed by the Certified Public Accounting firm which reviews corporate and personal records and prepares our tax returns.

4. All the contributions in question were charged directly to my personal account and were paid for by myself in after tax dollars. Evidence of this fact is shown on the face of at least one of the two checks in question and in personal and company accounting records. Please review the check copies you have.

Page One of Two

Bill Walker & Associates, Inc., McKinnon Airport, St. Simons Island, Georgia 31522 Telephone 912/638-3191 Fax # 912-638-1354

9304351518

5. Being a small and infrequent political contributor and having only made these contributions to the Mattingly campaign because Senator Mattingly and his family are neighbors and personal friends, I was unaware of the details about how contributions must be made. If some detail of this small contribution was in violation to the Election laws, my violation was inadvertent and unintentional, was a paper error and the tax consequence remained proper due to the internal charge backs issued at the time.

Mr. Long, I ask that you favorably consider this letter along with the copies of the checks you have in you file, at least one of which shows the personal charge back directions on the face of the check. Any consideration you can give to me for this small and absolutely innocent infraction, if an infraction actually existed, would be very gratefully received by me and my family. We work hard to comply with the laws, have no other charges, violations or even traffic tickets and do sincerely wish and strive to be the very best law abiding citizens possible.

Thank you for your consideration.

William Q. Walker, Jr.
PRESIDENT

Sworn to and Described before me this 14 day of August 1990.

Notary Public, Glynn County, Georgia
My Commission Expires Dec. 14, 1994

Notary Public

9304351569

OGC 7473

The Willis Group, Inc. 415 East Monroe Street • Jacksonville, FL 32202 • 904/358-3898

AUGUST 7,1990

90 AUG 16 AM 10:53

FEDERAL ELECTION COMMISSION
WASHINGTON,D.C.,20463

RE:MUR 2989
WILLIS AND VEENSTRA INVESTMENT COMPANY,not a corporation

ATTN:MS ELIZABETH CAMPBELL OR MR. jEFFREY LONG

Dear Lady or Gentleman:

Please be advised of the following:

1.Willis and Veenstra Investment Company is not a Florida Corporation.It is a General Partnership that was formed on August 3,1973 and is still in existence.Attached for your use is a copy of the original partnership agreement.Also attached is a copy of check No.2750 drawn on that partnership account that was made payable to the Friends of Mattingly.

2.Willis and Veenstra Investment Co.,INC.is a Florida Corporation,however,it has never been utilized nor has it ever had a bank account.

I trust tnat this will conclude this matter,however,if I can be of any further service please do not hesitate to call on me. I can be reached at (904)358-3898.

Sincerely,

Lynwood G. Willis,A.I.A.

fedelec.let

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 16 PM 12:41

9304351570

2750

February 15, 1985

WILLIS AND VEENSTRA INVESTMENT CO.
415 EAST MONROE
JACKSONVILLE, FLORIDA 32202

CYCLE-30

063100008 26

63-696/630

NCNB National Bank of Florida Jacksonville, FL 32202

PAY EXACTLY FIVE HUNDRED AND 00 CTS. $ 500.00

TO THE ORDER OF

FRIENDS OF MATTINGLY

WILLIS AND VEENSTRA INVESTMENT CO.

⑈2750⑈ ⑆063100008⑆ 930435151711

930435151 7 2

049 24 782

The Citizens National Bank

PROCESSED VCN6 03/07/93

26 TAMPA, FLORIDA 63-20

MUR 2989
93043515173

OGC 7477
RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG 16 PM 12:49

Minis, Russell, Mayhew, Inc.
Financial Consultants
P.O. BOX 23559
Savannah, Georgia 31403

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 16 PM 3:57

July 24, 1990

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

RE: MUR2989 A. MINIS, JR.

Dear Mr. McGarry:

I have received your letter of July 20 and naturally regret that I have violated any law. Enclosed is a copy of the "factual and legal analysis" of my contribution.

It shows $100 in February 1984 and $1000 in May 1985. Is it possible that these contributions, more than a year apart, could have been for the same election? I doubt it.

My records, however, do not let me question your figures. I would like to pursue pre-probable cause conciliation, as suggested in your letter.

Sincerely yours,

A. Minis, Jr.

AMJr:jmv
Enclosures
P.S. This letter was dictated on July 24 and through an office error not mailed.

DATE	Ck#	AMOUNT		FOR
6/1/83	312	$ 100	Tr. Co.	Friends of Mattingly
9/23/83	626	$ 500	F. Union	" "
2/24/84	481	$ 500.	Tr. Co.	" "
5/15/85	775	$1,000	Tr. Co	Georgia Tribute to the President
6/21/85	1070	$ 500. (A. Poulson party)	F. Union	Friends of Mattingly

202 376-8200
Ely Communications
Jeffrey Jones

93043515174

HAND DELIVERED

DOC 7484

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 AUG 17 AM 10:22

LAW OFFICES
TROTTER SMITH & JACOBS
A Professional Corporation

400 Colony Square
1201 Peachtree Street
Atlanta, Georgia 30361
(404) 881-0500

Telecopier 872-1110

20 Technology Parkway
Norcross, Georgia 30092
(404) 441-7900

Telecopier 448-6548

Michael V. Coleman
Direct Dial (404) 881-3918

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 AUG 17 PM 12:55

CONFIDENTIAL

August 16, 1990

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
999 E Street
Washington, D.C. 20463

Re: MUR 2989
R. M. Channell

Dear Mr. McGarry:

We have been designated as counsel for R.M. Channell, and are writing in response to your letter dated July 20, 1990, regarding the above-referenced matter. In your letter, you set forth the factual and legal basis for the finding by the Federal Election Commission (the "Commission") that there is reason to believe that Mr. Channell violated the contribution limits of the Federal Election Campaign Act of 1971, as amended (the "Act"). For the reasons set forth below, we believe that no action should be taken against Mr. Channell in connection with this matter.

The basis for the Commission's finding were two checks drawn on Mr. Channell's account totalling $2,800.00, which were applied to Mack Mattingly's 1986 campaign for election to the United States Senate. The first check, in the amount of $300.00, was dated September 29 and made payable to "Friends of Mattingly." The second check, in the amount of $2,500.00, was dated October 3 and made payable to "Georgia Victory '86". A notation on that second check indicated that it represented payment for a photograph opportunity with the President of the United States.

While the first check was clearly a contribution to the Mattingly campaign, Mr. Channell delivered the second check in response to a solicitation for a photograph opportunity with the

2304351175

LAW OFFICES
TROTTER SMITH & JACOBS
A Professional Corporation

President of the United States. The purpose of the second check was to purchase the photograph opportunity, and not to make a contribution to the Mattingly campaign. While Mr. Channell was probably aware that some of the funds would flow through to the Mattingly campaign, and maybe other Republican campaigns, his primary motivation was to pay for an opportunity to have his photograph taken with the President. The fact that the check was made payable to "Georgia Victory '86", rather than to "Friends of Mattingly" as was the earlier check, supports the view that it was not Mr. Channell's primary intent to make a contribution to the Mattingly campaign.

Mr. Channell relied on the persons making the solicitation to apply contributed funds in accordance with the applicable federal election laws. He had no reason to believe that his payment to hav his picture taken with the President would constitute a violation of such laws.

For the foregoing reasons, we respectfully request that the Commission take no further action against Mr. Channell with respect to this matter. Alternatively, Mr. Channell would like to enter into pre-probable cause conciliation negotiations with the Commission.

Thank you for your consideration.

Sincerely,

Michael V. Coleman

MVC/fb

Enclosures

cc: Elizabeth Campbell
R. M. Channell

2053mvc.wrd

2304351517 6

OGC 7481

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 AUG 16 PM 12:20

THE PINKERTON AND LAWS
COMPANY
875 DOUGLAS ROAD, N.E.
ATLANTA, GEORGIA 30342

J. PAUL CRANMER
SENIOR VICE PRESIDENT

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 17 PM 12:55

August 14, 1990

Mr. Jeffrey Long
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2989
The Pinkerton and Laws Company

Dear Mr. Long:

In response to the letter of August 3, 1990 alleging that a contribution had been made by our company in connection with the 1986 General Election in Georgia to Mack Mattingly, we have reviewed our records. We found that a check was processed through our accounting system, but subsequently was voided. Enclosed is a microfilm copy of the voided check for your inspection.

After a diligent search of our accounting records, we can find no instance of any contribution in connection with the election campaign of Mack Mattingly or any other candidate for public office. Based on this information, we respectfully request that this matter be closed with no action against our corporation.

Yours Truly,

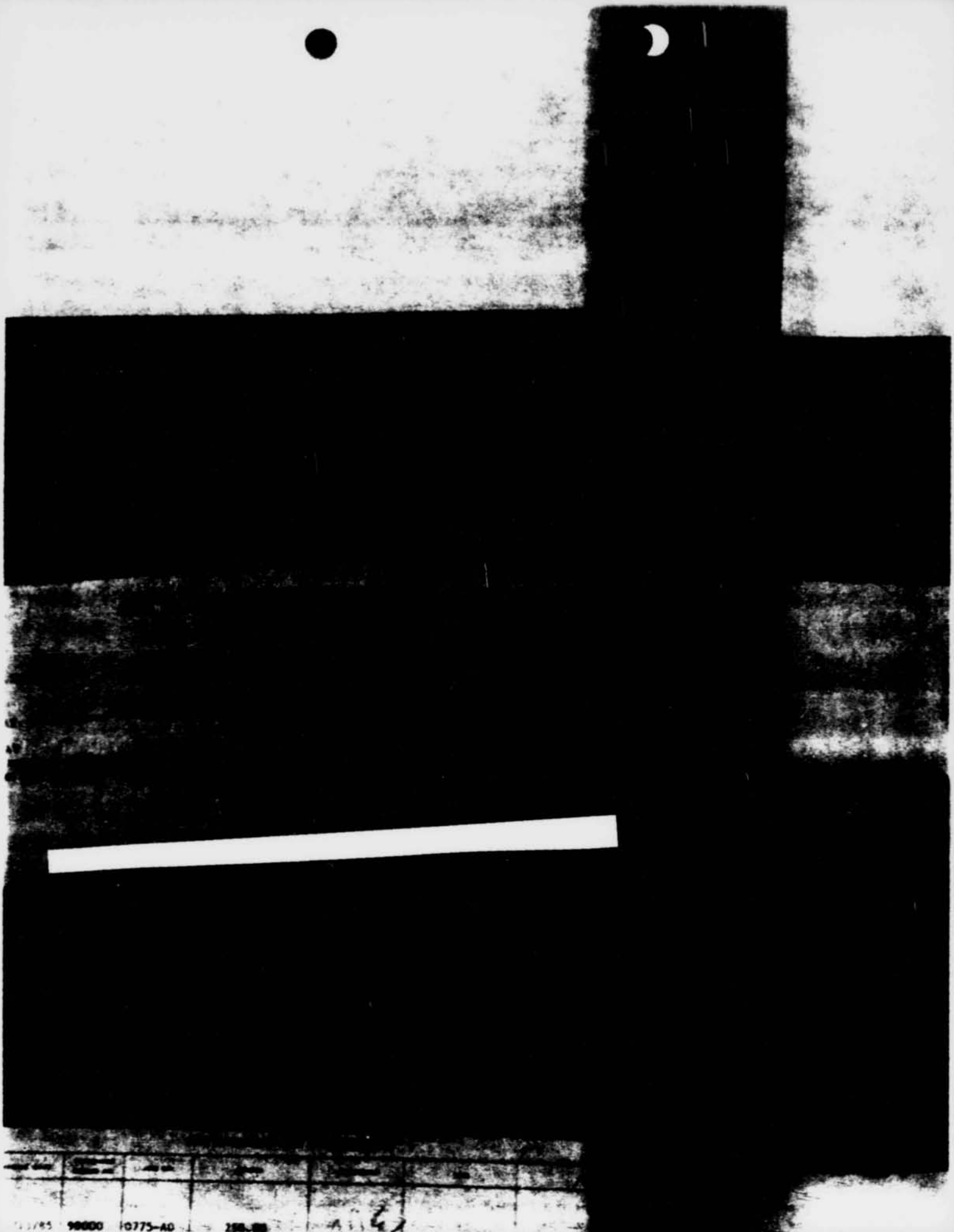
THE PINKERTON AND LAWS COMPANY

J. P. Cranmer
Sr. Vice President

TELEPHONE 404 256-1000

TELEX: 804449 P AND L

9304351517



MUR 2989

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG 17 PM 2:27

PERRY, WALTERS & LIPPITT
ATTORNEYS AT LAW
409 NORTH JACKSON STREET
POST OFFICE BOX 469
ALBANY, GEORGIA 31703-8401

H. HOLCOMBE PERRY, JR.
JESSE W. WALTERS
S. B. LIPPITT, JR.
JAMES E. REYNOLDS, JR.
MARVIN W. MIXON
C. RICHARD LANGLEY
DONALD W. LEE
L. CLAYTON SMITH, JR.
NANCY GREY R. GRIGG

TELEPHONE
(912) 432-7438
432-7481
TELECOPIER
(912) 436-[illegible]

August 14, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 20 AM 11:42

Federal Elections Commission
Washington, D. C. 20463

Attention: Lee Ann Elliott, Chairman

Re: MUR 2989 - WRIGHT FARMS

Dear Ms. Elliott:

Your letter of August 3, 1990 (received August 9, 1990), acknowledged.

Pursuant to the second paragraph of your letter, there is herewith submitted Affidavit of Henry T. Wright, President of Wright Farms, Inc., and Affidavit of Reid Mills, Assistant Vice President of Trust Company Bank of South Georgia.

Mr. Wright's affidavit advises that Wright Farms, Inc. has been a dormant corporation for many years, made no political contributions during the year 1986, filed no tax returns for that year, owns no real estate and does no farming or other business activity. Mr. Wright's affidavit further is to the effect that he individually made contributions to "Friends of Mattingly" during the year 1986.

Mr. Reid Mills' affidavit is to the effect that the account upon which the enclosed copies of checks were drawn, was on the account of Henry T. Wright and the account was not a corporate account, but was the individual account of Henry T. Wright.

It appears to the writer that this should clarify this situation and reveals that Wright Farms, Inc. did not make any political contributions to any one during the year 1986. However, if you desire further information, please advise and the same will be promptly furnished.

Very truly yours,

Jesse W. Walters

JWW:rd
enclosures

9304351517 9

GEORGIA,

DOUGHERTY COUNTY:

Personally appeared before the undersigned, an officer authorized by law to administer oaths, **HENRY T. WRIGHT**, who upon oath, deposes and says, that he is President of **WRIGHT FARMS, INC.**, a Georgia corporation that has been dormant for a number of years, including the years 1985, 1986, 1987, 1988, 1989 and 1990 to date, that **WRIGHT FARMS, INC.** has filed no tax returns for the aforementioned years, that **WRIGHT FARMS, INC.** owns no real estate, does no farming or other business activity, and made no political contributions during the year 1986;

Affiant further deposes and says that during the year 1986 he individually made contributions to "Friends of Mattingly" in the amount of $550.00 by checks drawn on Trust Company Bank of South Georgia, N.A., a copy of such checks being attached hereto; that the account on which such checks were drawn was the individual account of Affiant and Affiant was doing business as **"Wright Farms"**. Affiant further deposes and says that he individually made a contribution to "Friends of Mattingly" during the year 1986 by check drawn on First National Bank of Albany in the amount of $200.00, a copy of said check being attached hereto.

Henry T. Wright

HENRY T. WRIGHT

Sworn to and subscribed before me, this 14th day of August, 1990.

Keith T Devenney

Notary Public
My Commission expires: 5/28/93

2043518O

GEORGIA,

DOUGHERTY COUNTY:

Personally appeared before the undersigned officer authorized by law to administer oaths, **REID MILLS**, who upon oath, deposes and says that he is Assistant Vice President of Trust Company Bank of South Georgia, N.A., and that as such, he has checked the records of Trust Company Bank of South Georgia, N. A., and that the account in Trust Company Bank of South Georgia, N.A., on April 7, 1986 and October 3, 1986, Account #6006062019 in the name of Wright Farms was the individual account of Henry T. Wright and was not a corporate account.

This the 13th day of August, 1990.

REID MILLS

Sworn to and subscribed before me, this 13th day of August, 1990.

Betty B. Suggs
Notary Public
My Commission expires: My Commission Expires June 13, 1994

930435151 81

PERRY, WALTERS
& LIPPITT
ATTORNEYS AT LAW
409 NORTH JACKSON STREET
POST OFFICE BOX 469
ALBANY, GEORGIA 31703
TELEPHONE
(912) 432-7438

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989 WRIGHT FARMS

NAME OF COUNSEL: Jesse W. Walters - PERRY, WALTERS & LIPPITT

ADDRESS: 409 North Jackson Street
Post Office Box 469
Albany, Georgia 31703

TELEPHONE: (912) 432-7438

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.

August 14, 1990
Date

Henry T. Wright
Signature

RESPONDENT'S NAME: HENRY T. WRIGHT - WRIGHT FARMS, INC.

ADDRESS: 2004 Nelms Road
Albany, Georgia 31705

HOME PHONE:

BUSINESS PHONE: (912) 883-2024

9304351582

2004 NELMS ROAD

ALBANY, GEORGIA 31705

930435151833

64-1335/612

April 7 19 86

PAY TO THE ORDER OF Friends of Mattingly $ 50.00

Fifty and no/100 DOLLARS

Trust Company Bank of South Georgia, N.A.
P.O. Box 1247
Albany, Georgia 31703

APR 7 486

FOR

HENRY T. WRIGHT, OWNER

Henry T. Wright

WRIGHT FARMS

2004 NELMS ROAD

ALBANY, GEORGIA 31705

7732

64-1335/612

10-3 19 86

PAY TO THE ORDER OF Friends of Mattingly $ 200.00

Two Hundred and no/100 DOLLARS

Trust Company Bank of South Georgia, N.A.
P.O. Box 1247
Albany, Georgia 31703

FOR

HENRY T. WRIGHT, OWNER

Henry T. Wright

WRIGHT FARMS

2004 NELMS ROAD

ALBANY, GEORGIA 31705

8379

64-1335/612

April 7 19 86

PAY TO THE ORDER OF Friends of Mattingly $ 300.00

Three Hundred and no/100 DOLLARS

APR 4 86

Trust Company Bank of South Georgia, N.A.
P.O. Box 1247
Albany, Georgia 31703

TRUST COMPANY BANK OF SOUTH GEORGIA, N.A.

FOR

HENRY T. WRIGHT, OWNER

Henry T. Wright

HENRY T. WRIGHT
RT. 4 BOX 417
ALBANY, GA 31705

59

PAY TO THE ORDER OF Friends of Mattingly $ 300.00

Three Hundred and no/100 DOLLARS

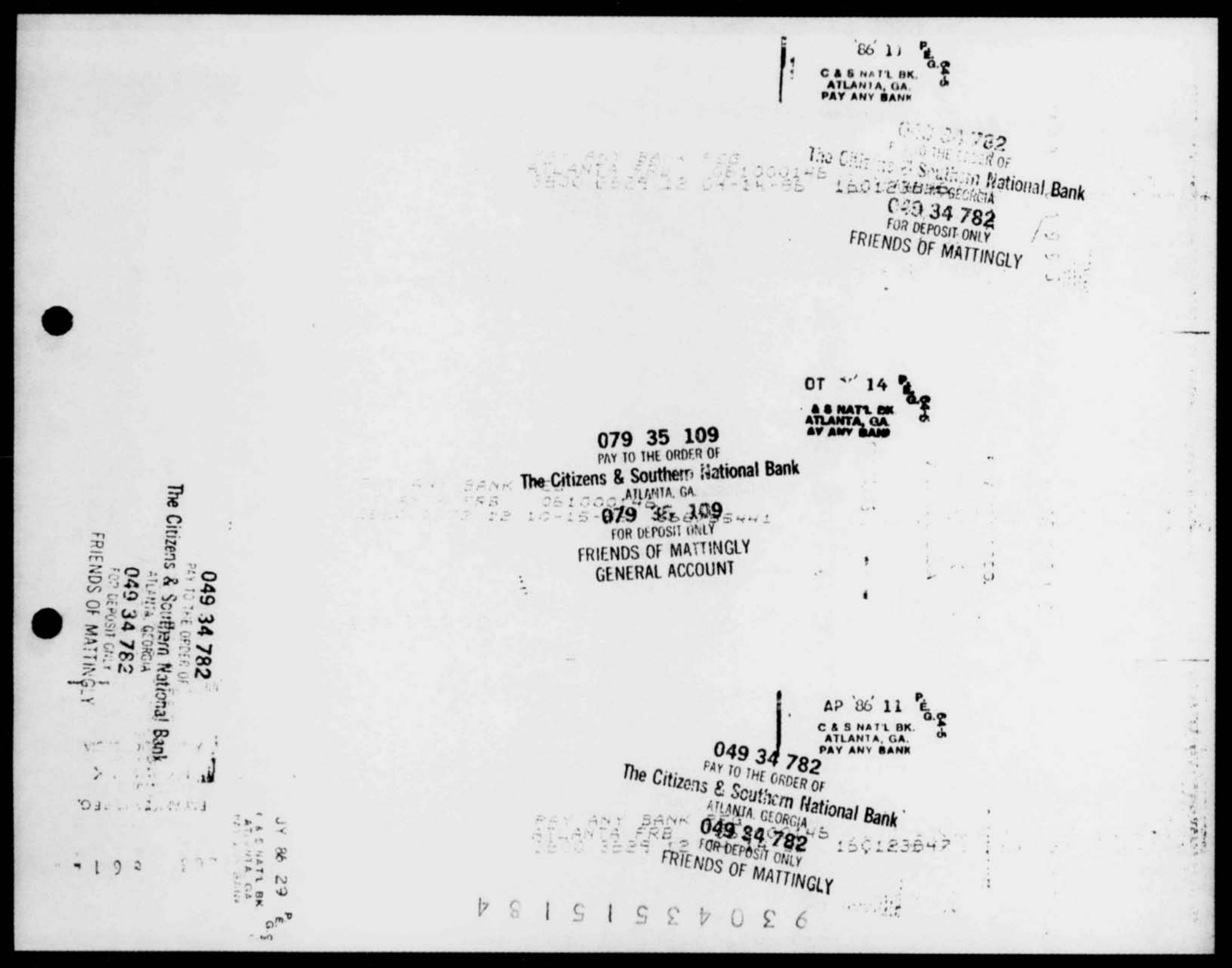
7-21 19 86

64-1335/612

First National Bank of Albany
Albany, Georgia 31702

FOR

Henry T. Wright


C & S NAT'L BK.
ATLANTA, GA.
PAY ANY BANK
049 34 782
The Citizens & Southern National Bank
049 34 782
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY
079 35 109
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GA.
079 35 109
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY
GENERAL ACCOUNT
049 34 782
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GEORGIA
049 34 782
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY

[redacted] [redacted] C 7487

August 14, 1990

Ms. Lee Ann Elliott, Chairman
Federal Election Commission
Washington, D. C. 20463

Dear Ms. Elliott:

I received your letter (your reference MUR 2989) about a donation in the amount of $285 I made to the campaign of Mack Mattingly, a Georgia candidate for the U. S. Senate. Reeves, Avary Associates, Inc. had been a corporation made up of myself and a partner to provide management consulting services to companies wishing to improve their productivity. However, our business effort was not successful, and the corparation was dissolved in 1985 and the Georgia Secretary of State's office was notified. In 1985, I became a full time person with the insurance marketing firm of A. L. Williams. As an independent business contractor associated with A. L. Williams, my business became Robert F. Reeves, **dba** Reeves, Avary Associates. But Reeves, Avary Associates was no longer a corporation but a dba name only.

In 1986, The A. L. Williams organization supported a fund raising rally for Mack Mattingly at the Omni complex in Atlanta. As an RVP (contract level in A.L. Williams) I had to purchase the tickets for all the people in my down line organization. Since this was a personal business expense for me, I paid for the tickets with a check from my personal business account **dba Reeves, Avary Associates**. Reeves, Avary Associates was not a corporation at that time. The misunderstanding has occured because the records at the Georgia Secretary of State's office are not accurate. I have contacted them before about this error.

In no way have I tried or intentioned to circumvent the election laws of the United States. Reeves, Avary Associates was not a corporation at that time, and did not violate 2 U. S. C. Sect. 441b(a).

Sincerely,

Robert F. Reeves

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG 17 AM 10:45

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 20 AM 11:42

9304351851185

06C7519

Moseley Linoleum & Tile Co.

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 AUG 20 AM 11:35

1609 WHITEWAY • EAST POINT, GEORGIA 30344 • 767-8202

August 17, 1990

Jeffrey Long
Federal Election Commission
Washington, D. C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:04

RE: MUR 2989
Patrician Properties

Dear Mr. Long:

After three attempts to reach you by telephone, I am answering the Commission letter of August 3, 1990.

The Patrician Properties, Incorporated, registered in Fayette County, Ga. with 1609 Whiteway, East Point, Ga. 30214 as office address, has never contributed to anyones campaign. As you will note, your address for a Patrician Properties is in Savannah, Ga.

I am enclosing a copy of the ledger sheet for this Corporation indicating how small an operation it was. The Corporation was dissolved in 1988. The bank account was at the Farmers and Merchants Bank in Fayetteville, Ga., now known as Barnett Bank.

I trust this will explain that there was no violation.

Sincerely,

Marjorie D. Moseley

Marjorie D. Moseley
(former Sec./Treas.
Patrician Properties, Inc.)

Enc.
copy ledger sheet

9304351518 6

BUTLER, WILLIAMS & WYCHE
CERTIFIED PUBLIC ACCOUNTANTS

D. MELSON BUTLER, CPA
HARRIS D. WILLIAMS, CPA
ROY W. WYCHE, JR., CPA
JAMES H. WANSLEY, CPA
WILLIAM S. LAMB, CPA
MARVIN W. ROBERTS, CPA
GLENN C. WYCHE, CPA
ANITA L. McCORD, CPA

JAMES F. BRASWELL, CPA
AMY S. REID, CPA
WENDY W. BARNHART, CPA
CHARLES B. HALL, CPA

915 HILL PARK
SUITE 101
MACON, GEORGIA 31201
(912) 742-3676

1719 RUSSELL PARKWAY
BUILDING 200, SUITE 202
WARNER ROBINS, GEORGIA 31088
(912) 953-9214

MEMBERS
AMERICAN INSTITUTE OF
CERTIFIED PUBLIC ACCOUNTANTS

August 16, 1990

Mr. Charles H. Jones
D/B/A Riverside Developments
P.O. Box 7006
Macon, Georgia 31298

Re: Federal Elections Commission
Letter of August 3, 1990

Dear Charles:

Being your accountant and tax advisor for over 33 years, you have asked us to comment on the communication from the Federal Election Commission concerning your $250 contribution to Mack Mattingly's political campaign in 1986 through Riverside Development's bank account. Our comments are as follows:

(1) Riverside Developments is not now a corporation and never has been since you adopted the name as a "trade name" over 25 years ago.

(2) The name is used for a bank account to account for all of your personal business income and expenses; that is, rents, interest, dividends, and related business expenses. In addition, you pay charitable contributions, property taxes, life insurance premiums and some personal non-business expenditures through this account.

(3) For income tax purposes, all items of income and related deductible expenses have always been reported on your personal tax return, form 1040. It is in the same category as a sole proprietorship, but the business transactions are all related to investment type income. The income and expenses never have been reported or deemed to be associated with a corporation.

Internal Revenue Service has reviewed this account, Riverside Developments, on several occasions during a routine audit and the account was accepted as being a personal operating account with no implications whatsoever as being a corporation.

(4) If by chance the Georgia Secretary of State's office has on record a corporate name "Riverside Developments", it must belong to another party and not to Charles H. Jones.

2304351-37

06C7535

OCMULGEE FIELDS, INC.
P. O. BOX 7006
MACON, GEORGIA 31298
1-912-741-1230

90 AUG 21 AM 10:40

August 17, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:07

Mr. Jeffrey Long
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2989
Riverside Developments

Dear Mr. Long:

Pursuant to our telephone conversation of August 14, 1990, I asked that our accountant, Mr. Roy W. Wyche, review your letter and respond accordingly. Upon his review, Mr. Wyche summarized Riverside Developments' status in his letter of August 16, 1990 to Mr. Charles H. Jones, which I have enclosed herewith.

I would appreciate your review of our accountant's response and advising me by letter the status of same at your earliest convenience.

Sincerely,

Charles J. Jones
President

CJJ/tle

Enclosure

9304351518 8

CHARLES J. JONES, PRESIDENT
DWIGHT C. JONES, V.P. OPERATIONS
CHARLES H. JONES, CHAIRMAN
PAUL P. WARD, V.P. MOTEL OPERATIONS
ANTHONY J. CLARK, CONTROLLER

86L-7501

Pacelli High School

Trinity Drive · Columbus, GA 31907-3299

DUANE F. KOCKX

PRINCIPAL

404 561-8243

90 AUG 20 PM 2:30

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:00

Federal Election Commission
Washington
DC 20463

ATTN: Ms. Elizabeth Campbell

15 August 1990

Dear Ms. Campbell,

In response to your letter of 3 August, reference MUR 2989, I have located the transaction in question.

The $200 check #796, dated 23 October 1986 and payable to Friends of Mattingly was not considered a donation. The voucher (supporting documentation for check #796) indicates that this was for two tickets to the presidential breakfast for Robert Deslauriers and Rick Iden and was expensed to Student Services (our acct #8525). Robert Deslauriers at that time was president of our student council. Rick Iden was a member of our social studies department.

It was indeed an honor for the city of Columbus when the President of the United States came to visit and our students naturally wished to take advantage of this opportunity to see him in person. Our social studies department took a large group of students to see him, but only one representative of the student body, their president, could attend the breakfast, together with his social studies teacher, at school expense.

Pacelli's participation in this event was not in support of any candidate or either party. If we are ever again honored with a visit by the President of the United States, regardless

2304351518 9

of party affiliation or the purpose of his or her visit, our student turn out will be the same.

Secondly, Pacelli High School is not a corporation. We operate under the auspices of the Catholic Diocese of Savannah and all property is owned by the Diocese.

I can only speculate that, when the Georgia Secretary of State was contacted, we were confused with the Pacelli Educational Foundation, Inc. (now inactive). It was also possibly around that time that the Pacelli Home and School Association submitted an application for incorporation. In that this is contrary to Diocesan policy, this parent group continues to operate as an auxiliary organization of the school.

I am confident that a second call to the office of the Georgia Secretary of State will clarify the situation and confirm that Pacelli High School is not, and never has been, incorporated.

If you have any questions or require any supporting documentation, please feel free to call me at (404) 561-8243. I would appreciate confirmation once you have closed the investigation.

I appreciate your courtesy and your assistance in identifying this transaction.

Sincerely,

Sylvia A. Meares
Office Manager

930435151990

DISBURSEMENT VOUCHER

DATE: 10/23/86

PAID TO: Friends of Hoffman Sq $ 200.00

FOR: _____

_____

_____

_____

POSTING DATA:

BUDGET AREA:

- ✓ ADMINISTRATIVE
- __ STAFF & CURRICULUM
- __ BUILDING AND GROUNDS
- __ ATHLETIC
- __ INCOME
- __ ACTIVITY FUNDS
- __ OTHER

NAME OF ACCOUNT Student Govt ACCT # ____ AMT $ ____

NAME OF ACCOUNT _____ ACCT # ____ AMT $ ____

NAME OF ACCOUNT _____ ACCT # ____ AMT $ ____

NAME OF ACCOUNT _____ ACCT # ____ AMT $ ____

NAME OF ACCOUNT _____ ACCT # ____ AMT $ ____

DV NR 472

CHECK NR 796

9304351519

PACELLI HIGH SCHOOL

CHECK REQUEST

Payable to: Friends of McHigh 200.00

For: 2 tickets for possible breakfast for Robert Dole Rick Isley

Requested by: [signature] P 10/23/86
(Signature) (Title) (Date)

Approved by: DW Campbell 10-28-86
(Signature) (Title) (Date)

Area of Budget from which this expense is to be deducted?

__Admin __S & C __B & G __ATH __ACTIVITY __INCOME __N/A

Name of Account _____ ACCT NR _____
_____ ACCT NR _____
_____ ACCT NR _____

When President Reagan was in town

__INCOME
__ACTIVITY FUNDS
__OTHER

NAME OF ACCOUNT [illegible] ACCT # ____ AMT $ ____

NAME OF ACCOUNT _____ ACCT # ____ AMT $ ____

NAME OF ACCOUNT _____ ACCT # ____ AMT $ ____

NAME OF ACCOUNT _____ ACCT # ____ AMT $ ____

NAME OF ACCOUNT _____ ACCT # ____ AMT $ ____

DV NR 472

CHECK NR 796

2304351592

MUR 2989 7529

LAW OFFICES

HURT, RICHARDSON, GARNER, TODD & CADENHEAD

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SUITE 1400

999 PEACHTREE STREET, N.E.

ATLANTA, GEORGIA 30309-3999

(404) 870-6000

TELEX 54-3668
TELECOPIER (404) 870-6020
870-6047

WRITER'S DIRECT DIAL NUMBER

870-6127

ONE LAKESIDE COMMONS
990 HAMMOND DRIVE, SUITE 1050
ATLANTA, GEORGIA 30328
(404) 399-9070

90 AUG 20 AM 11:23

August 15, 1990

Federal Elections Commission
Washington, D.C.

ATTN: Mr. Jeffrey Long

RE: MUR 2989
Teresa Crossland

Dear Mr. Long:

Pursuant to our conversation today regarding the above-referenced matter, it is our understanding that you have given us a reasonable extension of time in which to respond to the investigation by the Federal Elections Commission of the alleged payment made to "Friends of Mattingly." We appreciate your professional courtesies and look forward to resolving this matter. We also look forward to hearing from Elizabeth Campbell regarding her investigation of the Mattingly Campaign and the name of the counsel for that Senate Campaign.

If we can return any courtesies to you or answer any additional questions, please contact the undersigned at his direct dial number.

Sincerely,

Stephen T. La Briola

Stephen T. La Briola
FOR THE FIRM

STL/bl

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:06

9304351519 3

OGC 7498

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 AUG 20 PM 2:31

MUR 2989

August 14, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:00

Elizabeth Campbell
Federal Election Commission
Washington, D. C. 20463

Dear Ms. Campbell,

In reference to our conversation of Wednesday, August 8, 1990, please find enclosed copies of said checks to Friends of Mattingly campaign.

Collins Brothers is a general partnership and not a corporation. There is a Collins Bros. Inc. located in or around Atlanta, Ga. however, there is no connection with Collins Bros. Partnership of Vienna, Dooly Co., Georgia.

If additional information is necessary to clear up this matter, please advise. Unless I hear further from you, I will assume this is sufficient.

Thanking you for your prompt attention to this matter, I am

Sincerely,

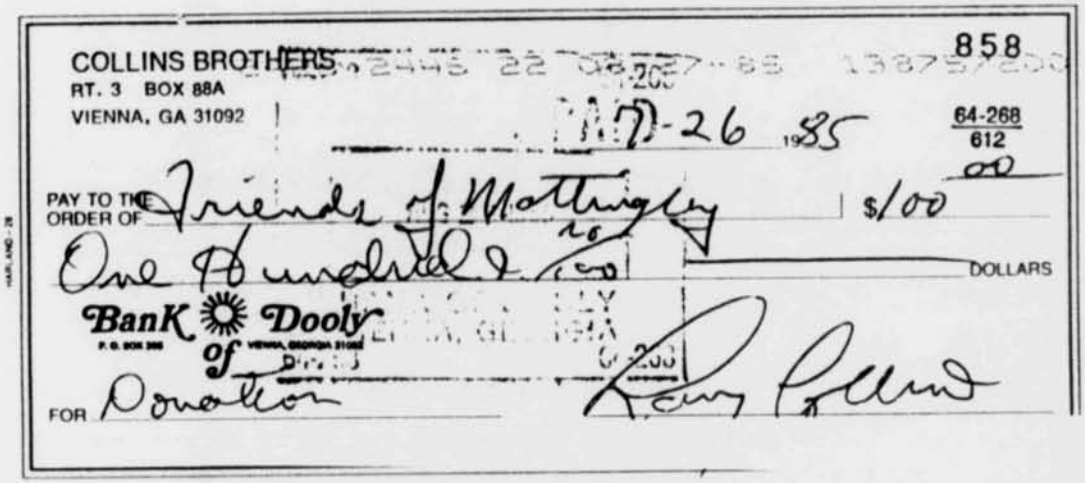
Larry Collins

Larry Collins, Partner
Collins Bros. Farms

enclosure

9304351524

9304351595



COLLINS BROTHERS
RT. 3 BOX 88A
VIENNA, GA 31092

858

64-268
612

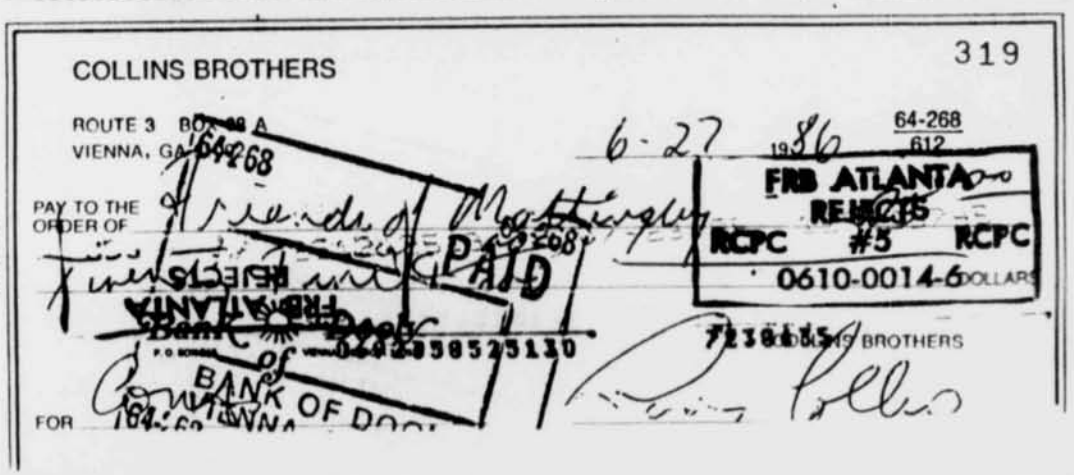
6-26 1985

PAY TO THE ORDER OF Friends of Mattingly $100

One Hundred and 00 DOLLARS

Bank of Dooly

FOR Donation



COLLINS BROTHERS

319

ROUTE 3 BOX 88 A
VIENNA, GA

64-268
612

6-27 1986

PAY TO THE ORDER OF Friends of Mattingly

FRB ATLANTA
RCPC #5 RCPC
0610-0014-6

DOLLARS

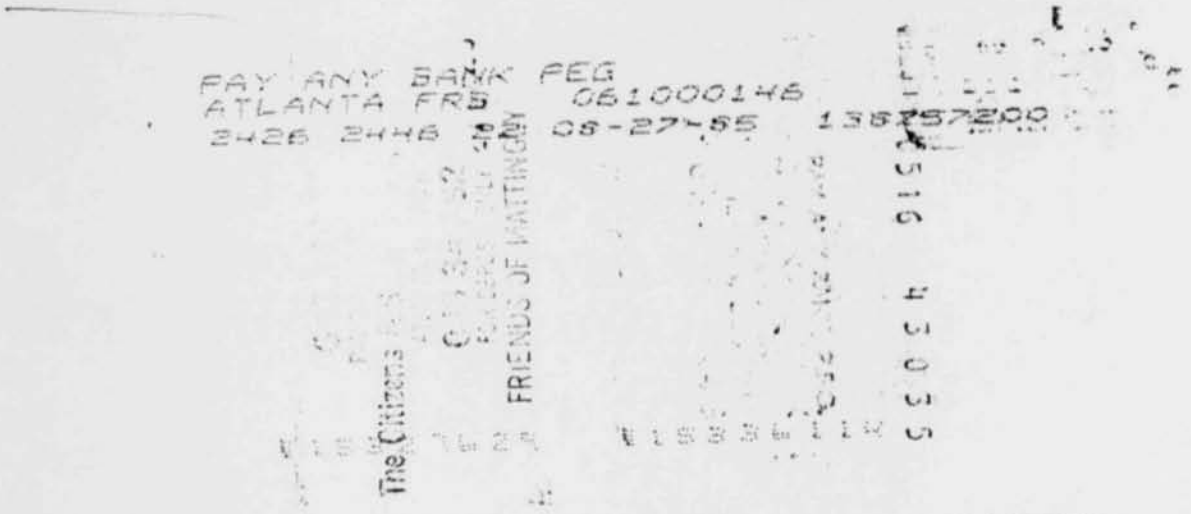
COLLINS BROTHERS

PAID

Bank of Dooly

BANK OF DOOLY

FOR


PAY ANY BANK FEG
ATLANTA FRS
061000146
2426 2446
08-27-55
FRIENDS OF MATTINGLY


JY '86 22
049 34 782
PAY TO THE ORDER OF
National Bank
049 34 782
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY

9304351597

1350

CENTURY 21 COOK REALTY, INC.
P O BOX 926 404 278-2115
DALTON, GA 30720

64-152
611

May 24 19 85

PAY TO THE ORDER OF Georgia Tribute to the President | $ 125.00

CENTURY 21 COOK REALTY 125 DOLLARS

C&S The Citizens and Southern National Bank
Dalton, Georgia

CENTURY 21 COOK REALTY, INC.

Maxine Wells

FOR

90 AUG 21 PM 12:00

RECEIVED
FEDERAL ELECTION COMMISSION

[redacted]

August 14, 1990

Ms. Campbell,

Per our telephone conversation this afternoon, enclosed is voided check number 1350, dated May 24, 1985.

I could not imagine anyone letting me make a contribution that was against the law, so I guess this solves that mystery.

Will look forward to hearing that this matter has been cleared on your end. Thank you for your help.

Yvonne Otts

[redacted]

[redacted]

[redacted]

9304351519 8

OGC7497

KING & PRINCE SEAFOOD CORPORATION

100 LANIER BOULEVARD
POST OFFICE BOX 899
BRUNSWICK, GEORGIA 31521 USA

August 14, 1990

90 AUG 20 PM 3:56
RECEIVED
FEDERAL ELECTION COMMISSION

Mr. John W. McGarry
Vice-Chairman
Federal Election Commission
Washington, DC 20463

RE: MUR 2989
J. Roy Duggan

Dear Mr. McGarry:

I am both surprised and puzzled by your letter of July 20 (which, incidentally, was not postmarked in Washington until August 9), and the attachments.

In reply, first of all I would like to say that I write the checks for all political contributions and most all of our charitable contributions for both my wife and me. Each of the checks for $1,000.00 which you show in your analysis were considered by me and my wife to be joint contributions. To the best of my recollection, the Mattingly Campaign Committee asked me if I could confirm this purpose and sent me a form which both my wife and I signed confirming that our contributions were joint contributions. This was in the form of a letter dated December 7, 1988, which I sent to the "Friends of Mattingly Campaign Committee". I believed that I had supplied all the information regarding these contributions that was necessary.

I do not believe at this time, almost seven years later on the older contribution and more than five years later on the 1985 contribution, that I could even find my records on this contribution. The Internal Revenue Service requires you to keep records supporting tax returns for three years, and I consistently do this, but I had no idea that I should keep records of campaign contributions for the period of time involved in your inquiry. I hope that my confirmation now of the manner in which these contributions were made will satisfactorily answer your inquiry. Apparently your regulations permit a contribution of $1,000.00 per person in an election and for my wife and I this does represent $1,000.00 each per election. Looking at your figures I am at a loss to understand where the figure $1,100.00 entered this picture.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 AM 11:29

9304351519 9

TELEPHONE: (912) 265-5155 • EASY LINK: 6282-8013 • TWX: 810-782-5074 • FAX: (912) 264-4812

In considering the promptness of my reply, please consider the fact that although your letter was dated July 20, I did not receive it until August 12, which is reasonable, considering it was not mailed until August 9. I believe that my reply at this time should be considered prompt reply. This letter has arrived on the eve of my departure with my wife on a trip to Ireland and London from which I will not return until August 25. If you should require any further information which I could possibly supply, pleae advise me.

Yours very truly,

J. Roy Duggan

J. Roy Duggan

JRD:sw

Enclosure: 1

9304351520 0

Attach to file

FRIENDS OF MATTINGLY

December 7, 1988

RECEIVED
DEC 19 1988
GAMMON AND STEWART

Mr. J. Roy Duggan
P. O. Box 913
Sea Island, Georgia 31561

Dear Mr. Duggan:

During the 1986 Senate Campaign we contacted you concerning your exceeding the contribution limitation. At that time you indicated how you wanted the excess contribution listed. Unfortunately, those records were misplaced and cannot be located in our storage warehouse. We would like to ask for your help again. Friends of Mattingly Committee is undergoing an audit by the Federal Election Commission. We ask that you re-affirm how you wanted your excess contribution of $ 1,100.00 listed. Would you please help us by indicating below to whom you would like the contribution listed, and have the person affirm this by signature.

We realize that this is an imposition on your time and memory; however, it would help us reconstructing these records for the audit.

Thanks very much,

Bill Stewart

Bill Stewart
For The Friends of Mattingly Committee

✓ Please list the contribution in my spouse's name:

SPOUSE'S NAME: Mabel R. Duggan

SPOUSE'S SIGNATURE: Mabel R. Duggan

____ Please list the contribution in the following name:

NAME: _____

ADDRESS: _____

_____

SIGNATURE: _____

EMPLOYER: _____

OCCUPATION: _____

PAID FOR BY FRIENDS OF MATTINGLY

93043515201

06C7513

ORAL AND MAXILLOFACIAL SURGERY ASSOCIATES

A Professional Association

J. David Allen, D.D.S.
Richard S. Singer, D.D.S.

Members of the American Association of Oral and Maxillofacial Surgeons
Members of the Georgia Dental Association

Gordon L. Brady, D.M.D.
Robert E. Going, Jr., D.D.S.

August 14, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12: 03

TO: Federal Elections Commission

RE: MUR 2989
Oral and Maxillofacial Surgery
Associates

Gentlemen:

I believe that the enclosed information will demonstrate that no further action will be necessary from the Commission against Oral and Maxillofacial Surgery Associates in the issue addressed in your correspondence (of which copies are attached).

As you will see from the photocopy of the check in question, the check was never processed, but, rather, was returned to us unused. We, therefore, voided the check in our records to correspond with the check being returned. YOu will see that no endorsement was made, and no effort to use the check in any way. Apparently the financial advisor to the campaign caught our (unintended) error, since we were not fully informed as to the differences in the Georgia laws versus the federal laws at that time.

If this information is insufficient in some way, please advise us as to any additional data that may be needed. We will assume, though, that this information will settle the matter.

Thank you for the grant of time in which to research our records and offer a correct reply to the inquiry.

Sincerely,

Beverly Allen

Beverly Allen
Business Manager

90 AUG 20 PM 12: 29

9304352502

ORAL AND MA[redacted] FACIAL SURGERY ASSOCIATES

A PROFESSIONAL ASSOCIATION

PHONE 981-9400

5243 SNAPFINGER WOODS DR. SUITE 106

DECATUR, GA 30035

9658

Dec. 2 19 85 64-151/611

PAY TO THE ORDER OF Mack Mattingly Campaign Fund $ 500.00

THE SUM 5 00 DOLS 00 CTS DOLLARS

CITIZENS DEKALB BANK CLARKSTON, GEORGIA 30021

02

FOR

⑆043515203⑆

MUR 2989

GARLAND, CRAFT & ARNOLD

CERTIFIED PUBLIC ACCOUNTANTS

MEMBER
AMERICAN INSTITUTE OF
CERTIFIED PUBLIC ACCOUNTANTS

DAWSON, GEORGIA
PHONE 912/995-5841

ROY E. GARLAND, C.P.A.
C. WESLEY CRAFT, C.P.A.
GREG R. GARLAND, C.P.A.

315 COURT STREET
P.O. BOX 343
CUTHBERT, GEORGIA 31740

CUTHBERT, GEORGIA
PHONE 912/732-3694

EDDIE EARL ARNOLD, JR., C.P.A.

August 14, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG 21 PM 12:01
OFFICE OF GENERAL COUNSEL

Attention: Elizabeth Campbell
Federal Election Commission
Washington, D.C. 20463

RE: Mur 2989
Curry Farm Supply

Dear Ms. Campbell:

I am a CPA and I do the accounting and income tax work for J. R. Curry, Jr., d/b/a Curry Farm Supply. The political contribution mentioned in your letter was a personal contribution made by J. R. Curry, Jr. using a Curry Farm Supply check. Curry Farm Supply is sole proprietorship operated by Mr. Curry and reported for income tax purposes on Schedule "C" of his individual form 1040. Curry Farm Supply is not a corporation. You should be able to verify this fact from his federal I.D. number

We do not understand how the Georgia Secretary of State office could have verified the corporate status of Curry Farm Supply unless they got the name confused with a different business, Curry Farms, Inc.

If you need any additional information, please do not hesitate to call me at (912) 732-3694 or Mr. J. R. Curry, Jr. at (912) 679-5558. Your help in getting this matter resolved will be greatly appreciated.

Very truly yours,

GARLAND, CRAFT & ARNOLD, CPA's

Eddie E. Arnold, Jr.

EEA:jam

Enclsoures

cc: Mr. J. R. Curry, Jr.
P.O. Box 291
Shellman, Georgia 31786

9304351520 4

OGC 7507

T&L CONSOLIDATED TAPE & LABEL, INC.
P. O. BOX 2355 30081
641 SMYRNA HILL DRIVE • SMYRNA (ATLANTA), GEORGIA 30080-4005
PHONE: 404-434-3158; FAXS: 404-434-5381

August 14, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:01

Federal Election Commission
Ms. LeeAnn Elliott, Chairman
Wasnington, DC 20463

RE: MUR 2989

Dear Ms. Elliott:

We have conducted a manual and computer check register audit of expenditures through our numeric voucher system of the 1986 Calander year. Consolidated Tape and Label, Inc. did not give a donation of in kind or check/cash to the Mattingly Senate Campaign. He has never been listed on our vendor list for contributions or otherwise. I am enclosing a check copy of the membership dues paid to the Georgia Republican Foundation for Consolidated Tape and Label, Inc. in the same amount as indicated in your letter dated August 3, 1990.

We are a very small company whose profits have been reduced by the economic cut back and inturn, we have canceled our membership in the Georgia Republican Foundation and like associations.

Please let me know if I can be of further help.

Sincerely,

W B Hendry

W. B. Hendry
President

90 AUG 20 PM 1:54

2304351520 5

CONSOLIDATED TAPE & LABEL, INC.

641 SMYRNA HILL DRIVE • SMYRNA (ATLANTA) GEORGIA 30080 • (404) 434-3158

PAY	$1,000.00	DATE 4/07/86	CHECK NUMBER 12832

TO THE ORDER OF . 1 THOUSAND 000 DOLLARS AND 00 CENTS

GEORGIA REPUBLICAN FOUNDATION
1776 PEACHTREE ROAD, NW
ATLANTA, GEORGIA 30309

64-124
611

Trust Company Bank of Cobb County
National Association / Smyrna, Georgia

W B Hudson

930435152006

PAY TO THE ORDER OF
FOR DEPOSIT ONLY
GEORGIA REPUBLICAN PARTY
DISBURSEMENTS ACCOUNT
0800 [illegible]

MUR 2989

DIXIE
TRUCKING COMPANY

(912) 265-6144 • P.O. BOX 960 • BRUNSWICK, GEORGIA 31521

90 AUG 20 AM 11:26

August 14, 1990

Federal Election Commission
Washington, D. C. 20463

RE: MUR 2989
Dixie Trucking Company

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:06

Dear Gentlemen:

In refernece to the contribution to the 1986 General Election in Georgia to Mack Mattingly as reported by Friends of Mattingly, pleased be advised that the first check for this contribution was returned by the Mattingly campaign because of being a corporate contribution. This was replaced by a check which was in turn charged to three of the corporate officers. These officers were F. M. Fairman, John A. Stubbs, and Carl G. Prendergast. We advised the Friends of Mattingly of this change at the time the second check was issued to them.

On September 30, 1986, a portion of the assets of Dixie Trucking Company (a Corporation) was sold to Michael G. Hazel, an individual. He is operating Dixie Trucking Company as an individual since he did not buy the Corporation.

I was employed by Dixie Trucking Company (a Corporation) at the time this contribution was made and therefore I have tried to answer this inquiry as I remember it.

If you have any further question concerning this matter, please contact F. M. Fairman, President; Dixie Trucking Company (a Corporation); P. O. Box 960; Brunswick, Georgia 31521.

We hope this will help clear the matter to your satisfaction.

Sincerely,

Dixie Trucking Company

Marie L Massey

Marie L. Massey
Manager

9304351520 7

090 7547

BROWN BROTHERS HARRIMAN & CO.
BUSINESS ESTABLISHED 1818
PRIVATE BANKERS

59 WALL STREET, NEW YORK, N.Y. 10005
CABLE ADDRESS "BROWNSBANK NEW YORK"
(212) 483-1818

August 13, 1990

90 AUG 21 PM 12:53
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG 21 PM 4:02
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Ms. Lee Ann Elliott
Federal Election Commission
Washington D.C. 20463

Re: MUR 2989
Brown Brothers Harriman & Co.

Dear Ms. Elliott,

We are responding to your letter of August 3, 1990 in which you indicate there is reason to believe we violated the Federal Election Commission Act of 1971. We are enclosing evidence to show that the contribution of $1,000 was not made by Brown Brothers Harriman & Co.

Brown Brothers Harriman & Co. is a licensed Private Bank and in the ordinary course of business it issues Cashier's Checks for its clients at their request. The contribution of $1,000 made to "Matt Mattingly for Senate" was in the form of a Cashier's Check that we issued, as a bank, to our client, J. M. Ireland, who in turn made the contribution. The Cashier's Check was issued persuant to her instructions on 6/5/86 and the $1,000 was debited to her principal account as indicated on the Cashier's Check

In summary, Brown Brothers Harriman & Co.'s only role in this transaction was as a bank issuing a Cashier's Check to its client. I enclose a copy of the Cashier's Check, the instructions to debit the client's account and a copy of our latest Statement of Condition as Private Bankers.

If you have any questions please contact me at 212-493-8351.

Very truly yours,

Edward W. Hoenig

Edward W. Hoenig
Deputy Manager

/bh

enclosures

2304351552008

9304351 5209

MONEY TRANSFER DEPARTMENT

CC 278167

ACCOUNT NUMBER 4910881 TYPE 2

BROWN BROTHERS HARRIMAN & CO.
PRIVATE BANKERS
59 WALL STREET, NEW YORK, N.Y. 10005

1-480/250

JUNE 5, 1985

AMOUNT $1,000.00**

PAY**ONE THOUSAND DOLLARS**
TO THE ORDER OF

MATT MATTINGLY FOR SENATE

PAYMENT ORDERED BY INST 6/5/86.
JMIRELAND
PRINCIPAL AC
PERSONAL FUNDS

CASHIER'S CHECK

AUTHORIZED SIGNATURE

930435152 10

The Citizens & Southern National Bank
ATLANTA, GA.
FOR DEPOSIT ONLY
TO THE CREDIT OF
GENERAL ACCOUNT

PAY TO THE ORDER OF

PAY ANY BANK, P.E.O.
CHASE MANHATTAN BANK
N.A. NEW YORK, N.Y.

070 35 1CB

601 JE 86 30

070

JE 86 30

AUG 08 '90 17:08 LEAHY ARCHIVES EB

Complete Domestic and Foreign Banking Facilities

DEPOSIT ACCOUNTS

COMMERCIAL LOANS AND DISCOUNTS

COMMERCIAL LETTERS OF CREDIT AND ACCEPTANCES

FOREIGN EXCHANGE

GLOBAL CUSTODY OF SECURITIES

•

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PRIVATE BANKERS



NEW YORK · BOSTON · PHILADELPHIA · CHICAGO
LOS ANGELES · DALLAS · HOUSTON · NAPLES
LONDON · LUXEMBOURG · PARIS · ZURICH
TOKYO · HONG KONG
GRAND CAYMAN · GUERNSEY

Correspondents throughout the World

Statement of Condition, June 30, 1990

ASSETS

CASH AND DUE FROM BANKS	$ 260,035,921
U.S. GOVERNMENT SECURITIES DIRECT AND GUARANTEED	154,161,497
STATE AND MUNICIPAL SECURITIES	50,870,161
FEDERAL FUNDS SOLD	95,250,000
LOANS AND DISCOUNTS	489,840,814
CUSTOMERS' LIABILITY ON ACCEPTANCES	23,119,733
INTEREST AND OTHER RECEIVABLES	31,383,189
PREMISES AND EQUIPMENT, NET	31,430,041
OTHER ASSETS	12,296,161
	$1,148,387,517

LIABILITIES

DEPOSITS		$ 952,733,926
FEDERAL FUNDS PURCHASED AND SECURITIES SOLD UNDER AGREEMENT TO REPURCHASE		42,905,000
ACCEPTANCES: LESS AMOUNT IN PORTFOLIO		23,119,733
ACCRUED EXPENSES		16,798,508
OTHER LIABILITIES		9,780,350
CAPITAL	$ 36,000,000	
SURPLUS	67,050,000	103,050,000
		$1,148,387,517

Licensed as Private Bankers and subject to examination and regulation by the Superintendent of Banks of the State of New York and by the Department of Banking of the Commonwealth of Pennsylvania. Subject to supervision and examination by the Commissioner of Banks of the Commonwealth of Massachusetts. The facilities of the Chicago, Los Angeles, Dallas, Houston, and Naples offices are limited to investment management, brokerage, and financial advisory services. The facilities of the Tokyo office and the Hong Kong, London, Paris, and Zurich subsidiaries are limited to arranging brokerage and financial advisory services. The facilities of the Guernsey subsidiary are limited to investment management services and arranging brokerage. Brown Brothers Harriman Limited, London, is a member of The Securities Association Limited (TSA). BBH Advisory Services Limited is a member of the Investment Management Regulatory Organisation Limited (IMRO). Brown Brothers Harriman (Luxembourg) S.A., bankers, is supervised by the Institut Monetaire Luxembourgeois.

OGC 7496

LAW OFFICES OF
FRIEDMAN AND SISSMAN, P.C.
ATTORNEYS AT LAW
SUITE 3010, 100 NORTH MAIN BUILDING
MEMPHIS, TENNESSEE 38103-5015

PHONE (901) 526-5975
FACSIMILE (901) 527-3633

ROBERT MICHAEL FRIEDMAN
BEN G. SISSMAN
WILLIAM W. HEATON
LAWRENCE W. WHITE
BETH COCKE

OFFICE MANAGER
MS. LYNN M. CORLEY

PARALEGAL
MS. NANCY M. MORROW

August 13, 1990

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 AM 11:29

Re: MUR 2989
Kenneth W. Anderton

Dear Mr. McGarry:

This letter is to advise that my partner, Robert M. Friedman, has been sent you letter of July 20, 1990, by Mr. Kenneth W. Anderton, regarding the above-referenced matter.

This communication was received in the office on August 4, 1990, the day after Mr. Friedman left for his vacation. We expect him to be back in the office on September 5, 1990.

I enclose with this letter the Designation of Counsel Form which we have sent to our client for his signature. As soon as I have received same, I will forward it to you.

I would appreciate an extension of time to respond to this matter until such time as my partner has had an opportunity to return and review this himself. As he is the personal counsel for Mr. Anderton and Mr. Anderton has specifically requested that he handle this matter.

I would appreciate it if you would let me know if there is any problem with this and look forward to hearing from you soon.

Many thanks for your kind cooperation and I remain,

Yours very truly,

FRIEDMAN AND SISSMAN, P.C.

Ben G. Sissman

BGS/ac

Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 20 PM 3:56

9304351521 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Robert M. Friedman

ADDRESS: Suite 3010
100 N. Main Bldg.
Memphis, Tennessee 38103

TELEPHONE: 901/526-5975

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: Kenneth W. Anderton

ADDRESS: Route 1 Box 340B
Collierville, Tennessee 38107

HOME PHONE:

BUSINESS PHONE: 901/756-1913

2304351521 3

OCL7547

FRANCIS C. LONG
CERTIFIED PUBLIC ACCOUNTANT
13A SOUTH MULBERRY - P. O. BOX 272
STATESBORO, GEORGIA 30458
(912) 764-9001

Member
Georgia Society of
Certified Public Accountants

Member
American Institute of
Certified Public Accountants

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 4:02

August 9, 1990

Lee Ann Elliott, Chairman
Federal Election Commission
Washington, D. C. 20463

Dear Chairman:

RE: William L. Reno
d/b/a William L. Reno and Associates
P. O. Box 606
Statesboro, Georgia 30458
MUR 2989

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG 21 PM 12:54

This is in response to your letter dated August 3, 1990. I am sending your " STATEMENT OF DESIGNATION OF COUNSEL " completed and signed by William L. Reno.

The contribution made to Friends of Mattingly was made by Mr. Reno personally. I am sending you a copy of the front and back of the check that was written on November 15, 1985. You will see from the check that the money did not come from a corporation. The check was drawn on a personal account of Mr. Reno's.

Mr. Reno is the sole shareholder of the corporation " William L. Reno and Associates, INC ". The contribution did not come from a corporate bank account.

Mr. Reno operates a real estate agency as follows:

Mr. William L. Reno
d/b/a William L. Reno and Associates

If I can provide any additional information please let me know.

Sincerely yours,

F. C. Long

Francis C. Long, MBA, CPA

xc:William L. Reno

9304351521 4

WILLIAM L. RENC[illegible] ASSOCIATES
P. O. b[illegible]6
STATESBORO, GEORGIA 30458

5004

11-15 19 85

383
612

PAY TO THE ORDER OF Friends of Mattingly $ 250.00

Two Hundred Fifty & 00/100 DOLLARS

Trust Company Bank of Savannah
National Association
Savannah, Ga.

FOR _____

Rick Parker

930435 | 52215

049 34 782

PAY TO THE

The Citizens & S[illegible]

FRIE[illegible]

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Francis C. Long, MBA, CPA

ADDRESS: 13 A South Mulberry Street
P.O. Box 272
Statesboro, GA 30458

TELEPHONE: 912-764-9001

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.

8-10-90
Date

William L. Reno
Signature

RESPONDENT'S NAME: William L. Reno

ADDRESS: P.O. Box 606
Statesboro, GA 30458

HOME PHONE:

BUSINESS PHONE: 912-681-6790

2304351521 6

OGC 7524

WALKER & SWEAT
ATTORNEYS AT LAW
809 ELIZABETH STREET
P.O. BOX 1100
WAYCROSS, GEORGIA 31502

90 AUG 20 AM 11:27

BRUCE M. WALKER
FORREST W. SWEAT, JR.

August 9, 1990

TELEPHONE 287-1100
AREA CODE 912

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:05

Ms. Elizabeth Campbell
Office of General Counsel
999 East Street, N. W.
Washington, D. C. 20463

Re: Fesperman Insurance Company
MUR: 2989

Dear Ms. Campbell:

Pursuant to our telephone conference earlier this week, I have enclosed an affidavit from Tommy Fesperman which states that Fesperman Insurance Company did make a contribution in the amount of $250.00 to the Friends of Mattingly election campaign. Prior to Lee Ann Elliott's letter of August 3, 1990, Mr. Fesperman was not aware that such action was in violation of any federal statute. Therefore, he did not have any criminal intent to violate such statute. As you can see from the affidavit, he has never made a contribution to a political organization in the past, and I seriously doubt that he ever will again.

Since my client is interested in pursuing a pre-probable cause conciliation, please contact me and advise me of your office's recommendation to the Federal Election Commission. In your recommendation to the Commission, please stress the fact that Mr. Fesperman did not have any criminal intent to violate the federal statute and that he has never made a political contribution in the past.

Thank you for your assistance in this matter, and if you have any questions concerning Mr. Fesperman, please do not hesitate to contact me.

With best regards, I am

Very truly yours,

Forrest W. Sweat, Jr.

FWSjr:ebf

Enclosure

cc:

Mr. Tommy Fesperman
Post Office Box 77
Waycross, Georgia 31502

2004351517

GEORGIA, WARE COUNTY.

PERSONALLY appeared before me, the undersigned officer duly authorized to administer oaths, GEORGE T. FESPERMAN, JR., who after being duly sworn deposes and says that he is the President of Fesperman Insurance Company. Deponent states that Fesperman Insurance Company did make a contribution of $250.00 on April 25, 1985 to the Friends of Mattingly election campaign. Up until recently, deponent nor any officer of Fesperman Insurance Company knew that such an action was in violation of a provision of the Federal Election Campaign Act of 1971. Deponent also states that Fesperman Insurance Company nor the deponent himself has ever made a political contribution in the past. The said contribution to the Friends of Mattingly campaign was in the amount of $250.00.

The deponent makes this affidavit in order to pursue a pre-probable cause conciliation with the Federal Election Commission.

George T. Fesperman, Jr.

Sworn to and subscribed before me

this 28 day of August, 1990.

Notary Public, State of Georgia

Notary Public, Ware County, Georgia
My Commission Expires May 23, 1994

9304351521 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 22, 1990

Robert M. Friedman, Esquire
Suite 3010
100 N. Main Bldg.
Memphis, TN 38103

RE: MUR 2989
Kenneth W. Anderton

Dear Mr. Friedman:

This is in response to your letter dated August 13, 1990, which we received on August 21, 1990, requesting an extension to respond. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 12, 1990.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

9304351521 9

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 22, 1990

Stephen T. LaBriola, Esq.
Hunt, Richardson, Garner, Todd
& Cadenhead
Suite 1400
999 Peachtree Street, N.E.
Atlanta, Georgia 30309-3999

RE: MUR 2989
Teresa Crossland

Dear Mr. LaBriola:

This is in response to your letter dated August 15, 1990, which we received on August 21, 1990, requesting an extension to respond to MUR 2989. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 4, 1990.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

9304351552 20

OGC 7561

90 AUG 22 AM 9:52

(STATIONARY OF CLAUDE WILLIAMS)

Federal Election Commission
Attention: Jeffrey Long or
Elizabeth Campbell
Washington, D.C. 20463

90 AUG 22 PM 12:55

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Re: MUR 2989
Claude Williams, Jr.

Dear Mr. Long and Ms. Campbell:

This letter is in response to a letter dated July 20 from Mr. John W. McGarry to me at my former residence. The actual postmark on the envelope is August 9, 1990. I actually received the letter August 12. I presume, therefore, that this letter is within the 15 days of my receipt of Mr. McGarry's letter.

Frankly, Mr. McGarry's letter and the enclosures are confusing to me. Even though I have no recollection of the circumstances or the contributions, the "Factual and Legal Analysis" enclosed with Mr. McGarry's letter says that I made excessive contributions of $1,100 to Senator Mattingly's Primary Election in Georgia and then discloses that I made two contributions of $1,000.00, one in October, 1983 and a second in May of 1985. I considered the contributions were made on behalf of my wife and me. We were supporters of Senator Mattingly and I do recall the early contribution to his Primary campaign. I thought the second contribution was for the general election, even though I made it prior to the Primary. I do not recall that Senator Mattingly expected any opposition in the Primary and I do not believe he had any. My making those contributions as early as I did in each of those instances, I thought, was so we could for each campaign and would not be involved in any subsequent fund raising activities.

I think you have made the assumption that my second contribution was also to the Primary campaign. Even so, I do not understand how you came up with an excessive contribution of $1,100.

2304351522 1

I am not familiar with the procedures you outlined in your letter, but it does appear to me that pre-probable cause conciliation will be the most appropriate way to dispose of this matter in the event the information set out above is not sufficient for you to make the decision that I did not make an excessive contribution. Consequently, I do request pre-probable cause conciliation. I am enclosing "Statement of Designation of Counsel" identifying S. Jarvin Levison of the law firm of Arnall Golden & Gregory as my counsel.

Yours truly,

Claude Williams, Jr.

2304351522222

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: S. Jarvin Levison

ADDRESS: Arnall Golden & Gregory
55 Park Place, Suite 400
Atlanta, Georgia 30335

TELEPHONE: (404) 547-4602

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.

8/14/90
Date

Claude Williams Jr.
Signature

RESPONDENT'S NAME: Claude Williams Jr.

ADDRESS: P.O. Box 5875
Athens, Ga. 30604

HOME PHONE: _____

BUSINESS PHONE: (404) 546-0100

2304335152223

OGC 7535

MORRIS
NEWSPAPER CORPORATION

POST OFFICE BOX 8167, SAVANNAH, GEORGIA 31412 • PHONE (912) 233-1281

90 AUG 22 AM 10:43

August 17, 1990

90 AUG 22 PM 12:54
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Elizabeth Campbell
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2989
Morris Newspaper Corporation

Dear Mrs. Campbell:

We have received a notice stating that our company (Morris Newspaper Corporation) made a contribution to the" Friends of Mattingly" totaling $250.00, and thus being a violation of 2 U. S. C. section 441b (a). We have researched our files and are unable to either confirm or refute this allegation.

In the absence of any information, we must assume that the contribution was made and made out of ignorance to the facts of the law. As such, we would like to persue pre-probable cause conciliation with the commission. Please let us know of your intentions regarding this matter. Should you have any questions please contact me at (912) 233-1281.

Sincerely,

Christopher H. Beecher

CHB/mw

2304351522 4

00C 7557

Folsom Construction Co.

2281 US Hwy. 41 South
Cordele, Georgia 31015
Ph. (912) 273-6626
Fax (912) 273-7579

August 20, 1990

Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

Re: MUR 2989 - Folsom Construction Co.

Dear Sirs:

As per your correspondence regarding the above this check was written inadvertently on the company account. Please contact us if you should need additional information.

Sincerely,

Brenda Clements

Brenda Clements
Folsom Construction Co.

RD:bc

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 22 PM 12:54

90 AUG 22 AM 10:39

93043515225

OGC 7572

GARY COOPER CONSTRUCTION CO.
2507 WEST DOUBLEGATE DR.
ALBANY, GA. 31707

90 AUG 23 AM 10:47

AUGUST 17, 1990

JEFFREY LONG
FEDERAL ELECTION COMMISSION
WASHINGTON, D. C. 20463

RE: MUR 2989
GARY COOPER CONSTRUCTION CO.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 23 PM 1:02

DEAR SIR:

PER OUR PHONE CONVERSATION ON THIS DATE I WAS UNAWARE THAT THIS CONTRIBUTION VIOLATED THE ACT. I WAS SOLICITED BY THE MATTINGLY CAMPAIGN MANAGER FOR ALBANY, GEORGIA A MRS. LIL KLEMANN. I HAVE NO DEFENSE OTHER THAN IGNORANCE OF THE ACT. SEVERAL HOURS AFTER OUR PHONE CONVERSATION I HAPPENED TO EAT LUNCH WITH OUR LOCAL CONGRESSMANN CHARLES HATCHER AND HE ADVISED ME THAT THE CANDIDATE SHOULD HAVE RETURNED MY CHECK AND THAT THE RESPONSIBILITY LIES WITH THE CANDIDATE.

SINCERELY
Gary D. Cooper
GARY D. COOPER

9304351522 6

OGC 7643

OLIVER MANER & GRAY

ATTORNEYS AT LAW

218 STATE STREET, WEST – POST OFFICE BOX 10186
SAVANNAH, GEORGIA 31412
TELEPHONE (912) 236-3311
FAX (912) 236-8725

THOMAS S. GRAY, JR
WILLIAM P. FRANKLIN, JR
JAMES L. PANNELL
JULIAN R. FRIEDMAN (GA. & S.C.)
WILLIAM T. MOORE, JR
DAVID H. DICKEY
I. GREGORY HODGES
ROBERT W. SCHIVERA (GA. & N.C.)
PATRICK T. O'CONNOR
THOMAS A. WITHERS
JAMES P. GERARD
WENDY W. WILLIAMSON
PATRICIA C. TANZER
JEFFREY A. FELSER
LAURA S. VINCZE
PAUL G. JUSTICE

CHARLES L. SPARKMAN
OF COUNSEL

TWIGGS & OLIVER
1897-1905
OLIVER & OLIVER
1906-1941
OLIVER, OLIVER & DAVIS
1942-1955
OLIVER, DAVIS & MANER
1955-1963
OLIVER & MANER
1963-1967

JOSEPH M. OLIVER
1907-1989
EDWIN MANER, JR.
1918-1984

August 27, 1990

90 AUG 28 PM 4:23
RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

John W. McGarry, Vice Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR2989
M. C. Anderson

Dear Mr. McGarry:

This letter is in response to the letter from the Federal Election Commission directed to M. C. Anderson, dated July 20, 1990, advising that there is reason to believe that he may have violated the Federal Election Campaign Act and requesting that we submit any factual or legal materials which may be relevant to the Commission's consideration of this matter. Accordingly, in answer to the same, we respectfully submit the following information:

90 AUG 28 PM 4:45
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

1. The factual and legal analysis attached to the letter is incorrect which states that Mr. Anderson made contributions to Mack Mattingly in the amount of $3,000.00 on May 13, 1985, and $250.00 on June 14, 1985. On the contrary, Mr. Anderson made only one contribution to Mack Mattingly of $500.00 on June 14, 1985, which is clearly within the limitations imposed by 2 U.S.C. §441a(a)(1)(A). A copy of his check made payable to the "Mack Mattingly Campaign" in the amount of $500.00 is attached for your information and consideration.

2. The factual analysis showing a contribution to Mack Mattingly of $3,000.00 on May 31, 1985, is incorrect. Mr. Anderson, in researching and locating his checks over five years ago, finds that the only contribution made on that date was $3,000.00 made payable to the "Georgia Tribute to the President", which is clearly within the limitations imposed by 2 U.S.C. §441a(a)(2)(C). A copy of this check is attached for your information and consideration.

2304351522 7

3. The check for $3,000.00 made payable to the "Georgia Tribute to the President" was solicited from Mr. Anderson on the basis that this contribution would entitle him to sit at the head table with the President at a dinner honoring the President of the United States. Due to a conflict in his schedule, Mr. Anderson, unfortunately, was not privileged to attend this dinner and sit with the President. While this event occurred over five years ago, to the best of his knowledge, the contributions were solicited on behalf of a Political Committee of the Georgia State Republican Party for the express purpose of honoring the President and was not intended as a contribution to Mack Mattingly or any other particular candidate. This is clearly obvious and supported by the check being payable to "Georgia Tribute to the President". It is further supported by the fact that when it was intended by Mr. Anderson to make a contribution to Mr. Mattingly only two weeks later, he made a check for $500.00 payable to the "Mack Mattingly Campaign". Only plain logic would conclude that Mr. Anderson, in making this $500.00 payable to the "Mack Mattingly Campaign" within two weeks of his contribution of $3,000.00 to the "Georgia Tribute to the President", had no knowledge at that time that this earlier contribution was intended for or otherwise directed to Mattingly.

4. In this case it is clear that the only contribution made to Mack Mattingly Campaign was $500.00. It is equally clear that the $3,000.00 was clearly made to a Political Committee honoring the President and was not intended for any particular candidate. At no time was it solicited on behalf of Mattingly, nor was Mr. Anderson advised that it would be used for the benefit of any particular candidate. The only representation made to Mr. Anderson in soliciting the contribution was that it would entitle him to sit at the head table with the President of the United States at a dinner honoring him.

Under the above facts, there has been no violation of the Federal Election Campaign Act. To hold otherwise, would make every citizen of this nation accountable for any appropriation or misappropriation of funds to a state political committee.

Accordingly, no action should be taken against Mr. Anderson and we respectfully request that this matter be dismissed or withdrawn. If you need any additional information, please do not hesitate to call me as you can be assured of our cooperation in furnishing you with any information necessary for the Commission to make a decision in this matter. I do intend to be on vacation following

2304351522 8

Labor Day until September 18th. If any further information is required, I will be glad to furnish the same upon my return.

Sincerely,

OLIVER, MANER & GRAY

CHARLES L. SPARKMAN
Of Counsel

CLS/ms

cc: Mr. Jeffrey Long

9304351552229

230435152 30

M. C. ANDERSON
P O BOX 7034
GARDEN CITY, GA 31408

May 31, 1985 1234

38-2
612

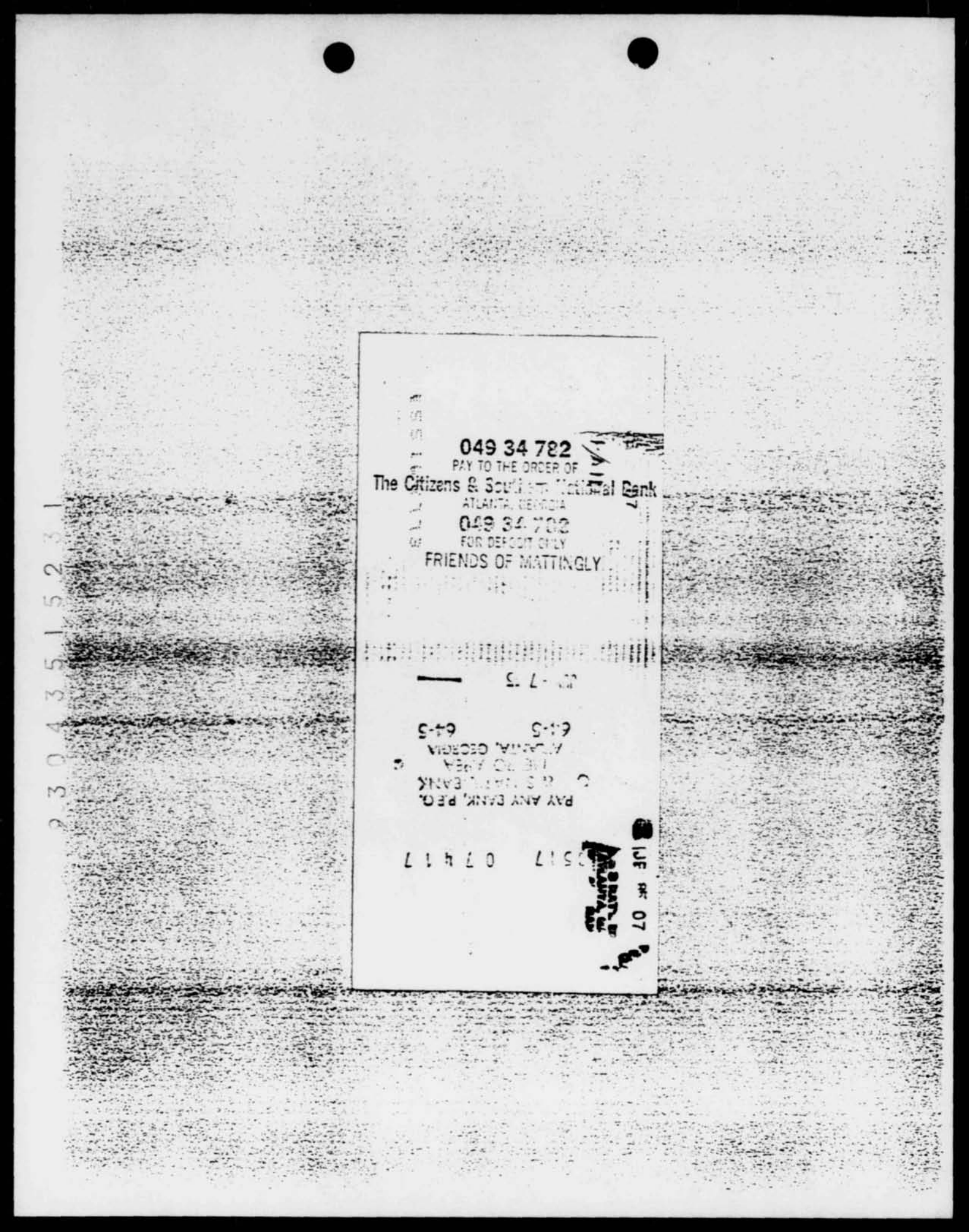
Pay to the order of "GEORGIA TRIBUTE TO THE PRESIDENT" $ 3,000.00

Three thousand and 00/100---------- Dollars

C&S The Citizens and Southern National Bank SAVANNAH, GEORGIA

Memo

M C Anderson


049 34 782
PAY TO THE ORDER OF
The Citizens & South
ATLANTA, GEORGIA
049 34 782
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY

9 3 0 4 3 5 1 5 2 3 2

M. C. ANDERSON
P O BOX 7034
GARDEN CITY, GA 31408

June 14, 19 85 1237

38-2
612

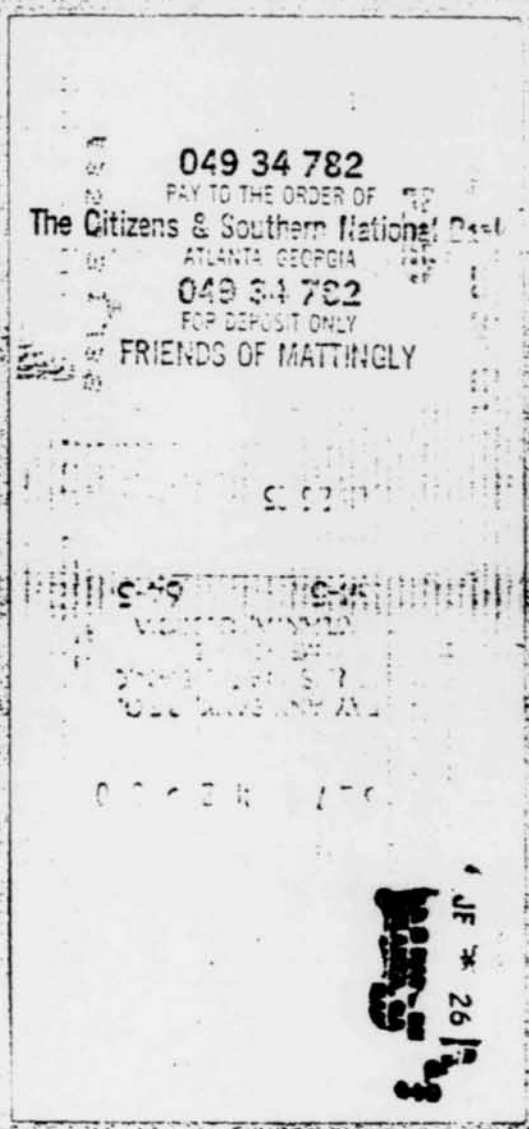
Pay to the order of Mack Mattingly Campaign | $ 500.00

Five Hundred and 00/100----------Dollars

C&S The Citizens and Southern National Bank SAVANNAH, GEORGIA

Memo

M. C. Anderson


049 34 782
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA GEORGIA
049 34 782
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY

06C7637

DAVIDSON, CALHOUN & MILLER, P.C.
ATTORNEYS AND COUNSELLORS AT LAW
THE JOSEPH HOUSE
828 BROADWAY
COLUMBUS, GEORGIA 31994-1599

J. QUENTIN DAVIDSON, JR.
MARCUS B. CALHOUN, JR.
CHARLES W. MILLER

P. O. BOX 2828
(404) 327-2552
TELECOPIER
(404) 323-5838

90 AUG 28 PM 12:38

August 22, 1990

90 AUG 28 PM 2:40
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

CERTIFIED RETURN
RECEIPT REQUESTED NO.: P 151 647 362

Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Attention: Elizabeth Campbell

Re: MUR 2989 Lovick P. Corn

Dear Ms. Campbell:

On July 24, 1990 our client, Mr. Lovick P. Corn, was notified by the Federal Election Commission ("FEC"), that the FEC had reason to believe that he had made political contributions in 1986 which violated 2 U.S.C. §441a(a)(1).

It is our understanding after telephone conversations with you that the FEC believes that Mr. Corn's October 27, 1986 check in the amount of $2,000.00 made payable to "Georgia Victory in '86", amounted to an excessive contribution to the campaign of then U.S. Senator Mack Mattingly. It is also our understanding that an FEC audit of the "Friends of Mattingly Committee" revealed the allegedly excessive contribution.

Our investigation of this allegation reveals Mr. Corn's total contributions to the Mattingly campaign amounted to $1,000.00. This contribution was made on September 6, 1986 by a check made payable to the Friends of Mattingly Committee. The October 27th contribution which you are investigating was not a contribution to Mattingly's campaign. The Georgia Republican Party, has advised us that Georgia Victory in '86 was a program which it established and maintained and that it was not one of Mr. Mattingly's authorized political committees. Please see the attached letter from the Georgia Republican Party acknowledging its establishment and maintenance of Georgia Victory in '86.

The statute which you cite, 2 U.S.C. §441a(a)(1), limits an individuals contributions to an authorized political committee of a candidate, such as the Friends of Mattingly Committee, to $1,000.00. 2 U.S.C. §441a(a)(1)(A). The statute also impliedly limits a person's contributions to political committees

9304351523 4

maintained by state political parties to $5,000.00. 2 U.S.C. §441a(a)(1)(C).

In light of the above, we are convinced that Mr. Corn's 1986 contributions, $1,000.00 to Mattingly's authorized political committee, and $2,000.00 to a state political party program, did not violate 2 U.S.C. §441a(a)(1), but fell instead within the contribution limitations established by the statute which the FEC alleges he violated.

We are confident that once the FEC has had an opportunity to fully review the facts concerning this matter, it will conclude that Mr. Corn's contributions were permissible. Following this conclusion we anticipate a quick resolution.

In the meantime, if you have any questions, or desire further information, please do not hesitate to call.

Very truly yours,

DAVIDSON, CALHOUN & MILLER, P.C.

By: Charles W. Miller

Charles W. Miller

CWM/cp
cc: Mr. Lovick P. Corn.
David A. Buehler
Marcus B. Calhoun, Jr.

2304351525

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG 21 PM 4:55

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
Friends of Mattingly and	)	
Donald P. Gammon, as treasurer	)	MUR 2989
72 Individuals	)	
17 Political Committees	)	
55 Corporations	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 19, 1990, the Commission found reason to believe Friends of Mattingly ("the Mattingly Committee") and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), and 441b(a), and 11 C.F.R. § 110.6(c)(3). The Commission granted the Mattingly Committee an extension of time to respond until August 31, 1990.

On the same date the Commission also found reason to believe 72 individuals had violated 2 U.S.C. § 441a(a)(1)(A), 17 political committees had violated 2 U.S.C. § 441a(a), and 55 corporations had violated 2 U.S.C. § 441b(a). Because of the number of these respondents, staff of this Office undertook training in the use of the "List Processing Menu" on the computer system. Letters and factual and legal analyses for these respondents have been prepared using this menu, thus saving a considerable amount of staff time. Nevertheless, several problems were encountered that required some time and effort to overcome. The notifications were prepared and sent in batches. Those to the 17 political committees were mailed on July 10 and 11, 1990. Those to the 72 individuals were mailed on July 20,

9304351523 6

1990. Those to the 55 corporations were mailed on August 3, 1990.

Responses and phone calls have started arriving on a daily basis.[1] The following respondents have, to date, requested preprobable cause conciliation:

Political Committees

American Financial Services Association PAC and Thomas L. Thomas, as treasurer

Associated General Contractors PAC and John R. Gentille, as treasurer

Bankers Trust New York Corporation Political Action Committee and Nancy C. O'Connor, as treasurer

Gold Kist Political Action for Farmers, Inc. and Paul G. Brower, as treasurer

The Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer

Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer

Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer

Individuals

A. Jalil

See Attachments. As previously noted, the Mattingly Committee has been given an extension of time to respond until August 31, 1990. Therefore, this Office concludes it would be premature to

9304351523 7

1. A number of notifications, all to individuals, have been returned by the Post Office as undeliverable or not forwardable. Staff of this Office are undertaking several steps to locate these respondents and determine their current address. As that is done, the notifications will be remailed to the new address.

enter into conciliation with the above respondents prior to receiving a response from the Mattingly Committee. At that point all responses and the audit workpapers can be reviewed to determine the facts prior to entering into conciliation.

Accordingly, this Office recommends that the Commission decline at this time to enter into conciliation with the above respondents. The form letter notifying the respondents of this decision will explain that the reason for declining to enter into conciliation at this time is to complete the investigation and that the request will be reconsidered at that time.

29043515238

II. RECOMMENDATIONS

1. Decline, at this time, to enter into conciliation with the following respondents prior to a finding of probable cause to believe:

   a. American Financial Services Association PAC and Thomas L. Thomas, as treasurer

   b. Associated General Contractors PAC and John R. Gentille, as treasurer

   c. Bankers Trust New York Corporation Political Action Committee and Nancy C. O'Connor, as treasurer

   d. Gold Kist Political Action for Farmers, Inc. and Paul G. Brower, as treasurer

   e. The Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer

   f. Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer

   g. Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer

   h. A. Jalil

2. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

8/21/90
Date

BY: [signature]
Lois G. Lerner
Associate General Counsel

Attachments
Requests for Conciliation

Staff Assigned: Elizabeth Campbell

9304351523 9

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Friends of Mattingly and Donald P. Gammon, as treasurer; 72 Individuals; 17 Political Committees; 55 Corporations.	)	MUR 2989

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 24, 1990, the Commission decided by a vote of 5-1 to take the following actions in MUR 2989:

1. Decline, at this time, to enter into conciliation with the following respondents prior to a finding of probable cause to believe:

   a. American Financial Services Association PAC and Thomas L. Thomas, as treasurer.

   b. Associated General Contractors PAC and John R. Gentille, as treasurer.

   c. Bankers Trust New York Corporation Political Action Committee and Nancy C. O'Connor, as treasurer.

   d. Gold Kist Political Action for Farmers, Inc. and Paul G. Brower, as treasurer.

   e. The Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer.

(continued)

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f. Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer.

g. Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer.

h. A. Jalil.

2. Approve the letters, as recommended in the General Counsel's Report dated August 21, 1990.

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

Attest:

8-24-90
Date

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

Received in the Secretariat: Tues., August 21, 1990 4:55 p.m.
Circulated to the Commission: Wed., August 22, 1990 11:00 a.m.
Deadline for vote: Fri., August 24, 1990 11:00 a.m.

dh

9304351524 1

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 28, 1990

A. Jalil
250 Dogwood Lane
Elberton, VA 30635

RE: MUR 2989
A. Jalil

Dear Mr. Jalil:

On July 20, 1990, you were notified that the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On July 25, 1990, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351524 2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 28, 1990

Robert E. McKew
Assistant General Counsel
American Financial Services
Association
1101 14th St., N.W. #400
Washington, D.C. 20005

RE: MUR 2989
American Financial Services
Association PAC and Thomas L.
Thomas, as treasurer

Dear Mr. McKew:

On July 10, 1990, you were notified that the Federal Election Commission found reason to believe that American Financial Services Association PAC and Thomas L. Thomas, as treasurer violated 2 U.S.C. § 441a(a). On July 25, 1990, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351552443

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 28, 1990

John R. Gentille
Treasurer
Associated General Contractors PAC
1957 E Street, N.W.
Washington, D.C. 20006

RE: MUR 2989
Associated General Contractors PAC and John R. Gentille, as treasurer

Dear Mr. Gentille:

On July 10, 1990, you were notified that the Federal Election Commission found reason to believe that Associated General Contractors PAC and you, as treasurer violated 2 U.S.C. § 441a(a). On July 17, 1990, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351524 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 28, 1990

Thomas L. Kraig, Jr.
Group Counsel
Textron, Inc.
40 Westminster St.
Providence, R.I. 02903

RE: MUR 2989
Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer

Dear Mr. Kraig:

On July 10, 1990, you were notified that the Federal Election Commission found reason to believe that Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer, violated 2 U.S.C. § 441a(a). On July 27, 1990, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351524 5

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 28, 1990

Nancy O'Connor
Treasurer
Bankers Trust Company
P.O. Box 318, Church Street Station
New York, N.Y. 10008

RE: MUR 2989
Bankers Trust New York
Corporation Political Action
Committee and Nancy C.
O'Connnor, as treasurer

Dear Ms. O'Connor:

On July 10, 1990, you were notified that the Federal Election Commission found reason to believe that Bankers Trust New York Corporation Political Action Committee and you, as treasurer violated 2 U.S.C. § 441a(a). On July 20, 1990, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351552246

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 28, 1990

Ellenore O'Hanrahan, Esquire
The Dun & Bradstreet Corp.
299 Park Avenue
23rd Floor
New York, N.Y. 10171

RE: MUR 2989
Political Action Committee
of the Dun & Bradstreet
Corporation and Philip C.
Danford, as treasurer

Dear Ms. O'Hanrahan:

On July 10, 1990, you were notified that the Federal Election Commission found reason to believe that the Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer, violated 2 U.S.C. § 441a(a). On July 27, 1990, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351524 7

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 28, 1990

J. David Dyson, Esquire
P.O. Box 2210
Atlanta, GA 30301

RE: MUR 2989
Gold Kist Political Action for Farmers, Inc. and Paul G. Brower, as treasurer

Dear Mr. Dyson:

On July 10, 1990, you were notified that the Federal Election Commission found reason to believe that Gold Kist Political Action for Farmers, Inc. and Paul G. Brower, as treasurer violated 2 U.S.C. § 441a(a). On July 18, 1990, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351524 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

August 28, 1990

Richard Moe, Esquire
Davis Polk & Wardwell
1300 I Street, N.W.
Washington, D.C. 20005

RE: MUR 2989
The Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer

Dear Mr. Moe:

On July 10, 1990, you were notified that the Federal Election Commission found reason to believe that your clients, The Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer, violated 2 U.S.C. § 441a(a). On July 25, 1990, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

The Commission has considered your request and determined, because of the need to complete the investigation, to decline at this time to enter into conciliation prior to a finding of probable cause to believe.

At such time when the investigation in this matter has been completed, the Commission will reconsider your request to enter into conciliation prior to a finding of probable cause to believe.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200 or 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351524 9

06C7612

SIMMONS & McANDREWS
ATTORNEYS AND COUNSELORS AT LAW
1441 FOURTH STREET
SANTA MONICA, CALIFORNIA 90401

(213) 458-1405
FAX (213) 394-4028

COLLEEN CONWAY McANDREWS
JERRY MARGARET SIMMONS

90 AUG 27 AM 10:49

HAND DELIVERED

VIA FEDERAL EXPRESS

August 24, 1990

Elizabeth Campbell, Esq.
Jeffrey Long, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 27 PM 12:51

RE: MUR 2989

Dear Ms. Campbell and Mr. Long:

This letter has been prepared in response to your letter dated July 11, 1990 in which you advised Northrop Employees Political Action Committee ("NEPAC") that the Federal Election Commission has found reason to believe the Committee has violated 2 USC Section 441a(a)(2)(A). Specifically, the Factual and Legal Analysis alleges that NEPAC made excessive contributions aggregating $2,000 to Mack Mattingly, a candidate for the United States Senate from Georgia, in connection with the 1986 primary election.

As you know, Colleen C. McAndrews of this office assumed the responsibilities of Treasurer of NEPAC on April 24, 1990. Although our office has worked with NEPAC and with the Committee's prior Treasurer and counsel, we have been unable to determine if all NEPAC records dating back to the early 1980's have been retained.

We have reviewed the available information regarding the contributions made by NEPAC to Senator Mattingly's authorized committee in connection with the 1986 primary. These contributions include the following:

- 1982 - $500.00
- September 23, 1983 - $1,000.00
- March 1, 1985 - $3,000.00
- June 28, 1985 - $500.00

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We have enclosed copies of the FEC 3X Reports of Receipts and Disbursements filed with the Federal Election Commission disclosing these contributions (with the exception of the contribution made in 1982).

Based on our review of NEPAC's contribution activity, we believe there may be some confusion regarding a contribution of $2,000 to Senator Mattingly's committee made on March 10, 1986. This contribution was disclosed as being designated for the 1986 primary election on the April monthly FEC 3X Report of Receipts and Disbursements filed on April 9, 1986. This was incorrect and an amendment was filed soon thereafter on April 16, 1986 revising the Report to disclose that the contribution was made in connection with the 1986 general election. We have also enclosed copies of these Reports.

Thus, the contributions made to Senator Mack Mattingly for the 1986 primary did not exceed the $5,000 per election limit provided for in 2 USC Section 441a(a)(2)(A).

I greatly appreciate your courtesy in extending the deadline to respond. Please feel free to contact me if you need anything further regarding this matter.

Sincerely yours,

Jerry Margaret Simmons

JMS/dm

Enclosures

2304351525

MUR 2989

WILLIAMS & JENSEN
A PROFESSIONAL CORPORATION
LAWYERS
1101 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036

TELEPHONE
(202) 659-8201

TELECOPIER
(202) 659-5249

OF COUNSEL
BARNABY W. ZALL

GEORGE D. BAKER
CAROLYN F. BIGDA
WILLIAM T. BRACK
ANN S. COSTELLO
WINFIELD P. CRIGLER
JUNE E. EDMONDSON
ROBERT E. GLENNON
J. STEVEN HART
ROBERT E. JENSEN
KAREN JUDD LEWIS
ROBERT J. MARTINEZ
JOHN J. McMACKIN, JR.
GEORGE G. OLSEN
SALLY B. PFUND
DAVID A. STARR
MARY LYNNE WHALEN
J. D. WILLIAMS

August 24, 1990

Ms. Lee Ann Elliott
Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

ATTENTION: Mr. Jeffrey Long
Office of General Counsel

RE: MUR 2989
Century 21 of the Southeast, Inc.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 27 PM 3:59

2304351552

Dear Ms. Elliott:

Respondent Century 21 of the Southeast, Inc. hereby files a preliminary response in the above-referenced enforcement proceeding. Respondent submits with this response certain relevant factual materials, described below.

Respondent respectfully requests that this action be dismissed, and that the file be closed with no further action to be taken, on the grounds that no unlawful contribution was made.

If the Commission is unable to dismiss this proceeding at this time, Respondent requests the following:

(1) an extension of time, to September 14, 1990, to assemble further evidence relevant to the proceeding, and

(2) an opportunity to participate in pre-probable cause conciliation, pursuant to 11 C.F.R. §111.18 (1990).

The remainder of this response details Respondent's evidence collected to date, and the evidence that Respondent is attempting to collect. The evidentiary difficulty stems from the fact that the event in question occurred more than five years ago. It is extremely difficult to obtain such dated information from banks and

from other relevant parties. In this regard, Respondent notes that the Federal Election Campaign Act provides a three-year statute of limitations for the alleged violation. 2 U.S.C.A. §455 (1985). The policy underlying the limitation period is "to protect individuals from having to defend themselves against charges when the basic facts may have become obscured by the passage of time." United States v. Wild, 551 F.2d 418, 424 (D.C. Cir. 1977). Although the FEC maintains that the FECA statute of limitations does not apply to its own enforcement proceedings, Respondent respectfully requests that the policies underlying the limitations period be taken into account in the decision whether to grant Respondent the requested extension of time.

Facts

The FEC has a photocopy of check #30379, dated May 22, 1985, payable to "Georgia Tribute to the President," from the account of Century 21 of the Southeast, Inc. at the State Street Union National Bank of Boston, Massachusetts. It is our understanding that there is no photocopy of the back of the check, indicating that the check was cashed, and no deposit information for the check. Respondent does not possess the check; its records indicate that the check was voided and was never cashed.

Allegation

The FEC has alleged that Respondent made an unlawful corporate contribution by said check to Mack Mattingly, a candidate for U.S. Senate in 1985.

Analysis

1. Party Nexuses

The "Georgia Tribute to the President" was a fundraising effort that featured President Reagan, who visited Georgia for the June 5, 1985 events. Funds were raised for the Mattingly for Senate campaign, and may have been raised for the Georgia State Republican Party and the National Republican Senatorial Committee as well. The 1985 Midyear Reports filed with the FEC provide some evidence of nexuses. An excerpt from the report filed by the Georgia Republican Party showing earmarked funds received and disbursed to the Friends of Mattingly is attached hereto as Exhibit A. An excerpt showing funds received by the Georgia Republican Party from the Republican National Committee and the Friends of Mattingly is attached as Exhibit B. An excerpt from the Mattingly

9304351525 3

for Senate Committee showing receipts from the "NRSC/Campaign Presidential Travel" is attached as Exhibit C.

The point of these fundraising nexuses is that the "Georgia Tribute to the President" may have involved party fundraising. Party fundraising frequently includes solicitations for corporate funds for party-building, nonfederal activities and other proper purposes. It is possible that the corporate check at issue was cut in response to a party solicitation. Consequently, Respondent is seeking diligently to obtain documentation of such a solicitation from its own files and from the Georgia Republican Party. This effort is one of the reasons for requesting an extension of time in this matter.

2. Receipt by Campaign Committee

Even if the check were intended for the Georgia or National Republican Party, it may have been routed to the Friends of Mattingly by mistake. Or it may have been delivered to the Friends of Mattingly in the mistaken belief that a corporate contribution would be lawful. If the mistake occurred, the question is, what would have happened next? It is probable that a clerk with the campaign committee photocopied all checks on receipt, and then forwarded the checks to a higher level committee staff person for legal review and bank deposit. A clearly identified corporate check then would raise a red flag, and probably trigger communication with the person who sent in the check, either by letter or telephone. The check might then be returned to the sender, or destroyed at the sender's request. In either case, the action would occur prior to the check's deposit.

Respondent's attorney has discussed this matter with individuals associated with the campaign committee, and is seeking a sworn statement as to the Committee's standard operating procedures. This is an additional reason for requesting an extension of time.

3. Company Records

The records of Century 21 of the Southeast, Inc. do not indicate that the check in question was cashed. In fact, the company's records indicate just the opposite. Attached hereto as Exhibit D is the July bank statement for Century 21 of the Southeast Inc. The printout of outstanding checks included check #30379. Exhibit E, attached hereto, is an internal company memorandum directing that check #30379 be voided. Exhibit F, the August statement includes a printout of the "batches" of checks that cleared in August. There is no entry for check #30379. At

9304351525 4

the same time, the printout of outstanding checks does not include check #30379, indicating that the instruction to void the check was followed.

Respondent seeks to bolster this proof with records from storage and with records provided directly by Respondent's bank, and for this additional reason seeks an extension of time.

4. Conclusion

Respondent's analysis has led it to the conclusion that the check made out to the Georgia Tribute to the President may have been received by the Friends of Mattingly campaign committee, and photocopied. However, the check apparently was not cashed by anyone and was not returned to the company's accounting division.

Respondent has seen no evidence that the Friends of Mattingly deposited or reported the alleged campaign contribution. If the FEC has any such evidence, Respondent would appreciate an opportunity to see it.

Respondent's Designation of Counsel is attached. Counsel would appreciate a prompt opportunity to discuss dismissal of the proceeding.

Sincerely,

WILLIAMS & JENSEN, P.C.

By: _____
June E. Edmondson

Attorney for Century 21
of the Southeast, Inc.

2304351552555

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: June E. Edmondson, Esq.

ADDRESS: Williams & Jensen, P.C.
1101 Connecticut Avenue, N.W.
Washington, D.C. 20036

TELEPHONE: 202-659-8201

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.

8/21/90
Date

Signature

RESPONDENT'S NAME: Century 21 Of The Southeast Inc.

ADDRESS: 2200 Century Parkway
Suite 190
Atlanta, GA 30345

HOME PHONE:

BUSINESS PHONE: 404-325-2321

2304351525 56

OGC 7650

Avail-Ability, inc.
561 THORNTON ROAD, SUITE S • LITHIA SPRINGS (ATLANTA) GA. 30057
(404) 944-0601

90 AUG 29 AM 10:54

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 29 PM 3:14

MUR 2989

August 18, 1990

Federal Election Commission
Washington, D. C. 20463

Gentlemen:

In response to your letter of August 3, 1990 with regard to my corporation having violated the Federal Election Campaign Act of 1971, please allow me to make the following explanation:

I have no recollection of this matter which you alledge to have occurred in 1986, and unfortunately my records are not readily accessible to me for this period of time; however, I would ask the Commission's favorable consideration towards me in this matter since the alledged action was done out of ignorance rather than malice. Since I do not remember the specific contribution, there is little I can offer by way of explanation. I can assure you, however, that it was not my intent to violate the law.

I would appreciate being advised of any penalty or fine that I may have imposed upon my corporation in conjunction with this $250 contribution, and I question why Senator Mattingly's campaign did not return this check and request a personal one since they should have known it violated the Election Campaign Act. It doesn't seem incumbent upon a small company like mine to keep up with election laws.

Again, I would appreciate being advised of the next step in this matter.

Very truly yours,

Freddi S. Hagin

Freddi S. Hagin
President

9304351525 7

MUR 2989
RECEIVED
FEDERAL ELECTION COMMISSION

John E. Stumbo
305 KNOXVILLE STREET • FORT VALLEY, GEORGIA 31030

90 AUG 29 PM 12:13

August 27, 1990

90 AUG 29 PM 4:30
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington D. C. 20463

In re: MUR 2989
George E. Luce

Dear Mr. McGarry:

I am writing as the son-in-law of George E. Luce. The family only recently received your letter of July 20, 1990. In that letter you indicate that Mr. Luce exceeded the contribution limits to the primary election of Mack Mattingly by $1,300.

My purpose in writing is to advise that George E. Luce died on July 5, 1990. Though I am an attorney I am writing as a member of the family to inquire as to the procedure which you would recommend be followed at this time as a result of the death.

Unfortunately, we do not know of any information from Mr. Luce's records which would explain the contributions which your office claims he made. Therefore, I will need for your office to send me copies of the supporting documentation which supports the allegations set out in your letter. I want to help the family resolve this matter as quickly and easily as possible at this difficult time for them.

I am sure that Mr. Luce did not realize that he was violating the law given the spread of three years of the donations and the small amount by which he exceeded the maximum allowed. In any event, I would appreciate response and the family will certainly cooperate. Thank you very much.

Very truly yours,

John E. Stumbo

9304351552588

OGC 7648

ThePrudential

John E. DeWand, CLU, FLMI
Assistant General Counsel
Law Department

The Prudential Insurance Company of America
751 Broad Street, Newark, NJ 07102-3777
201 802-8940 Fax: 201 802-8180

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG 29 PM 2:04

August 23, 1990

VIA: FAX AND HARD COPY CONFIRMATION

Honorable Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.C. 20463

ATTN: Elizabeth Campbell
Jeffrey Long

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 29 PM 4:20

Re: **MUR 2989**
PRUDENTIAL PAC AND
MILAN E. JOHNSON AS TREASURER

2304351552559

Dear Chairman Elliott:

This letter will reply to your letter of July 10, 1990 to Milan E. Johnson on the referenced matter pursuant to the postponement granted by George F. Rishel, Assistant General Counsel on August 1, 1990.

Thank you for the professional courtesy of the postponement.

For the record, it is necessary and appropriate to note that the long delay in assertion of a violation substantially prejudices the respondents' ability to furnish a satisfactory and complete reply. Notice in July of 1990 occurs three years and nine months after the last relevant contribution at issue and over seven years after the first one.

It is recognized that the three year statute of limitation applies only to criminal matters not civil and is therefore not relevant. But taken in conjunction with the similar three year period required for maintenance of file records, the two reference periods set a benchmark which is materially exceeded in this matter. As a result, our ability to respond adequately to the matters alleged is substantially prejudiced.

We, nevertheless, believe there exist good and valid defenses to the matters alleged. However, in the interest of expediting an early conclusion to this matter, and to avoid a protracted and burdensome contest over the relatively minor violation asserted in the allegation, I am authorized to confirm that the Prudential PAC and Mr. Johnson as its Treasurer are willing, without prejudice, to pursue pre-probable cause conciliation.

If this is acceptable, I would appreciate confirmation from your office at your earliest convenience.

Thank you very much. Please feel free to contact this office if there are any additional questions.

Respectfully,

John E. DeWald
Assistant General Counsel

JED/vdm
Info. cc: Milan E. Johnson
Executive Vice President

Lawrence M. Noble, Esq.
General Counsel

ATTN: George F. Rishel, Esq.
Assistant General Counsel

9304351526O

Carl Bolch, Jr.

P.O. Box 105035
Atlanta, Ga. 30348
404-431-7600

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG 30 AM 9:48

August 20, 1990

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
999 E Street, NW
Washington, DC 20463

REFERENCE: **MUR2989, Carl Bolch, Jr.**

Dear Mr. McGarry:

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 30 PM 12:35

This letter responds to your letter dated July 20, 1990, with respect to the above referenced matter.[1] In your letter you state that "there is reason to believe" I violated 2 U.S.C. §441A(a)(1)(A) by contributing an excessive amount of money to the 1986 Republican U.S. Senate primary election campaign of Mack Mattingly. Your understanding of the facts with respect to these contributions is mistaken.

In June of 1985, I gave $1,000 to the Georgia Tribute to the President to be used for Senator Mattingly's election campaign. In July 1986, my spouse, Susan Bass Bolch, gave $1,000 to the Friends of Mattingly Committee in support of Senator Mattingly's election campaign.

I have reaffirmed this understanding to the Mattingly campaign (see attached letter). Given the foregoing facts, that my wife was the designated donor for the contribution given to the 1985 campaign, and that I was the designated donor for the 1986 campaign, I differ with the Federal Election Commission's allegation that I made excessive contributions to the Mattingly campaign.

I look forward to receiving your response at your earliest convenience.

Sincerely,

Carl Bolch, Jr.

Attachments

[1] Your letter was received by me on August 14, 1990, and had been postmarked August 9, 1990.

2304351526 1

OGC 7680

BEASLEY, WILSON, ALLEN, MENDELSOHN & JEMISON, P. C.

Attorneys at Law

JERE L. BEASLEY
FRANK M. WILSON
J. GREG ALLEN
KENNETH J. MENDELSOHN
MAYS R. JEMISON
RANDALL B. JAMES
MICHAEL J. CROW
THOMAS J. METHVIN
MARK J. WILLIAMS

10TH FLOOR BELL BUILDING
207 MONTGOMERY STREET
POST OFFICE BOX 4160
MONTGOMERY, ALABAMA 36103-4160
(205) 269-2343

JAMES W. TRAEGER
(1953-1987)

TELECOPIER
(205) 269-2371

August 28, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG 30 PM 3:19

Honorable Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D.C. 20463

RE: Homeway Rentals of Montgomery
MUR 2989

Dear Ms. Elliott:

A letter from the Federal Election Commission dated August 3, 1990 was mailed to me. I have forwarded your letter to William L. Tribble, Attorney, Post Office Box 2095, Dublin, Georgia 31021, who represents this company.

Very truly yours,

BEASLEY, WILSON, ALLEN,
MENDELSOHN & JEMISON, P.C.

JERE L. BEASLEY

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 30 PM 4:31

JLB/lg

cc: Mr. William L. Tribble

2304351526 2

OGC 7681

LAW OFFICES

HICKS, MALOOF & CAMPBELL

A PROFESSIONAL CORPORATION

ROBERT E. HICKS
MAURICE N. MALOOF
CHARLES E. CAMPBELL
ROBERT A. BARTLETT
CHARLES E. WILSON III
ROBERT E. TRITT
BRUCE M. EDENFIELD
PETER J. QUIST
J. MICHAEL LEVENGOOD
J. DAVID DANTZLER, JR.
STEVEN R. BENDER
MICHAEL S. BRADLEY

SUITE 2200, MARQUIS TWO TOWER
285 PEACHTREE CENTER AVENUE, N.E.
ATLANTA, GEORGIA 30303-1234

(404) 588-1100

FACSIMILE (404) 420-7474

WRITER'S DIRECT DIAL NUMBER
420-7403

LISA WEBB WANNAMAKER
HENRY F. SEWELL, JR.
VIRGINIA B. PETERSON
DARREN K. HENSLEY
VICTORIA A. GEORGE
LAWRENCE H. WEXLER
EDWARD D. HIRSCH
JAMES A. HARVEY
THOMAS R. WILLIAMS, JR.
STEPHEN R. CARMODY
KIM L. MARCHNER

August 24, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 AUG 30 PM 1:02

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 AUG 30 PM 4:31

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

RE: MUR2989 Eugene Kelly.

Dear Mr. McGarry:

This is in further reference to our letter of August 6, 1990 with respect to the above matter at which time we indicated to you Mr. Kelly is interested in pursuing pre-probable cause conciliation pursuant to 11 C.F.R. §111.18(d). We indicated to the Federal Election Commission Staff that we would make a submission from Mr. Kelly by the end of August in connection with the pre-probable cause conciliation effort.

Please find enclosed an Affidavit executed by Mr. Kelly setting forth the information he desires to communicate to the Federal Election Commission concerning the circumstances surrounding contributions made by him and his wife to the Friends of Mattingly Committee in connection with the re-election campaign of Senator Mack Mattingly.

We believe this information demonstrates that neither Mr. Kelly nor his wife knowingly violated the Federal Election Laws and that any excessive contributions were inadvertently made and not questioned by the Mattingly Campaign. In addition, it appears the Mattingly Campaign did not properly report the contributions that were reported and omitted to report an additional contribution in the amount of $2,000 made on September 24, 1985.

It is the hope and desire of Mr. Kelly to resolve this matter through an appropriate agreement with the Federal Election Commission. We trust you will let us know as to what further steps need to be taken by Mr. Kelly to accomplish that result.

2304351552563

Mr. Kelly will, of course, provide any additional information to the Federal Election commission or its staff that you feel you may need in this matter.

Very truly yours,

HICKS, MALOOF & CAMPBELL, a
Professional Corporation

By: Charles E. Campbell
CHARLES E. CAMPBELL

CEC/jlc
Enclosure
cc: Mr. Eugene W. Kelly

2304351552664

A F F I D A V I T

STATE OF GEORGIA
COUNTY OF FULTON

I, **EUGENE W. KELLY**, do hereby state under oath as follows:

1.

I make this Affidavit based on personal knowledge for use on my behalf in the following matter before the Federal Election Commission: **MUR 2989 Eugene Kelly.**

2.

I reside at Route 1, Liberty Church Road, Monticello, Jasper County, Georgia 31064 and have resided at this location at all times material to the matters referred to in this Affidavit.

3.

Other than canceled checks received in my bank statements in the ordinary course of business, I do not maintain any records with respect to political contributions. Upon receipt of the letter dated July 20, 1990 from the Federal Election Commission concerning the possible excessive contributions in 1985 and 1986 to "Friends of Mattingly Committee" ("Mattingly Campaign") in connection with the re-election campaign of United States Senator Mack Mattingly, I caused to be made a review of my bank account records for those years. The contributions made to the Mattingly Campaign were all made from a bank account I maintain jointly with my wife at Bank of Monticello styled "Eugene W. or Rita Kelly".

4.

In addition to the contributions referred to in the attachment to the letter from the Federal Election Commission dated July 20,

9304351526 5

1990 with respect to this matter, the following additional contributions were made from the same account: a contribution in the amount of $2,000 by Check No. 3566 dated September 24, 1985.

5.

In 1985 and 1986 at the time the contributions were made to the Mattingly Campaign, it was my understanding of the Federal Election Laws that an individual could contribute up to $1,000 per election to the candidacy of an individual running for federal office. It was further my understanding that a separate $1,000 contribution could be made for each election with the primary, runoff and general elections being considered separate elections. It was further my understanding of the Federal Election Laws that a contribution made from a joint account of a husband and wife would be deemed to be one half from the husband and one half from the wife. To the best of my recollection, that was the intent with respect to each of the contributions made to the Mattingly Campaign.

6.

I do not recall any contact from the Mattingly Campaign about the contributions made by me and my wife and it would have been my expectation in 1985 and 1986 that if any reason existed to question the propriety of any of the contributions the Mattingly Campaign would communicate with me or my wife. I do not recall having met, corresponded with or spoken with any official of the Mattingly Campaign.

7.

2304351526

To the best of my recollection, neither I nor my wife have ever spoken with Senator Mattingly, communicated with his office or requested any assistance from Senator Mattingly, his office or the Mattingly Campaign with respect to any matter. The contributions made by me and my wife were motivated solely by our belief Senator Mattingly was a strong supporter of President Reagan and our perception that what President Reagan was trying to accomplish for the Country was in the national interest.

8.

It is my present belief that at the time my wife and I made the 1986 contributions to the Mattingly Campaign we did not recall the 1985 contributions to the Mattingly Campaign. We did not at any time knowingly contribute in excess of what we understood the Federal Election Law limits to be.

9.

To the extent any of the contributions my wife or I made to the Mattingly Campaign are deemed to be excessive under the Federal Election Laws, we are prepared to give appropriate assurances to the Federal Election Commission that we will not violate such Election Laws in the future.

FURTHER, AFFIANT SAITH NOT.

EUGENE W. KELLY

Eugene W Kelly

Sworn to and subscribed
before me this 20th day
of August, 1990.

Bernice K. Tanner
Notary Public

Notary Public, Jasper County, Georgia
My Commission Expires July 13, 1992

930435152667

06C7677

Rose Briglevich, M.D.
Smyrna Medical Building, Suite 207
3903 South Cobb Drive
Smyrna, Georgia 30080

MUR 2989

Internal Medicine

Telephone 404/433-0434

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 AUG 30 PM 3:19

August 27, 1990

Lee Ann Elliott
Federal Election Commission
Washington, D. C. 20463

Dear Ms. Elliott:

I am writing to you regarding your inquiry about my donation to the Republican Party. As I recall, I was contacted by the local Republican Party Headquarters, to attend a speech, reception and dinner hosted by President Reagan. I was ecstatic at the opportunity to meet the President of the nation in which I had become a naturalized citizen.

As a resonable person, I feel, I was lead to believe that I was donating money to see President Reagan and not to a local campaign. Being foreign born, I was not aware of any rule governing donations, if I had been I certainly would have donated according to the law. I had no intention to do otherwise.

If you require any references to substantiate my character and reputation I will be happy to supply them to you.

Sincerely,

Rose Briglevich, M. D.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 30 PM 4:31

2304351526 8

OGC 7695

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: William M. McIntosh

ADDRESS: FALLIN & McINTOSH
P. O. Box 250
Moultrie, Georgia 31776

TELEPHONE: (912) 985-5881

90 AUG 31 PM 2:11

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

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.

August 10, 1990
Date

Thomas L. Estes MD
Signature

RESPONDENT'S NAME: Moultrie Surgical Assoc., PC

ADDRESS: 3004 2nd Street, S.E.
Moultrie, Georgia 31768

HOME PHONE:

BUSINESS PHONE: (912) 985-1080

9304351526 9

OGC 7693

WINBURN E. STEWART
Chairman of the Board
Emeritus
WINBURN E. STEWART, JR.
(Brother)
President
JEAN OUTLER-BORINSTEIN
Vice Pres. / General Manager

JAMES L. SOLOMON
(King)
Vice Pres. / Sales
FRANK A. CICALESE
Vice Pres. / Operations

90 AUG 31 AM 11:

Bibb Distributing Company

August 28, 1990

Mr. Jeffrey D. Long
Federal Election Commission
Washington, D.C. 20463

SUBJECT: MUR 2989

Dear Mr. Long:

In response to our previous telephone conversation, I submit Bibb Distributing Company's and Winburn E. Stewart, Jr.'s comments.

Bibb Distributing Company does not contest check #07054 in the amount of $250.00 dated June 14, 1985 given to Matt Mattingly. The Company does wish to state for the record that in 1986, Winburn E. Stewart, Jr. bought out his father's ownership of the Company.

In regard to the excess contributions by Winburn E. Stewart, Jr., totalling $1,125.00 to Matt Mattingly contributed in 1986, I submit the following:

$1,000	2/24/86	Contributed by Winburn E. Stewart
$25	5/29/86	Contributed by Winburn E. Stewart
$100	7/7/86	Contributed by Winburn E. Stewart
$1,000	7/10/86	Contributed by Winburn E. Stewart, Jr.

As you can see, Winburn E. Stewart, Jr.'s father contributed the first three checks to Matt Mattingly.

Based on the above responses, I will wait to hear from you should you need any additional information. I did not send copies of the cancelled checks, as I assumed you already had them. Thank you for your assistance in this matter.

Sincerely,

Robert M. Nicholson

Robert M. Nicholson
Comptroller & Secretary

RMN/lw

c Winburn E. Stewart, Jr.

RECEIVED
FEDERAL ELECTION COMMISSION
90 AUG 31 PM 3:11

2304351520

6401 HAWKINSVILLE ROAD • P.O. BOX 929 • MACON, GA 31202 • PHONE 912-784-1700 • FAX 912-784-1493

06C7734

90 SEP -3 AM 10:50

A. G. SPANOS CONSTRUCTION, INC.
1341 W. ROBINHOOD DRIVE • STOCKTON, CALIFORNIA 95207
TELEPHONE (209) 478-7954

August 28, 1990

FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 AM 10:11
RECEIVED

Mr. Jeffrey Long
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Long:

This letter is written in response to your correspondence of August 3, 1990 and in reference to MUR 2989. As I stated on the phone, A.G. Spanos Development, Inc. routinely makes political contributions through the central office here in Stockton. However, the contribution in question to Friends of Mattingly was prepared in the Atlanta division by someone unaware of the federal regulations surrounding political contributions.

Upon receiving the corporate contribution, Friends of Mattingly promptly returned it to the Atlanta office at which time the check was voided. We have the voided original and have attached a copy of both the front and back of the check.

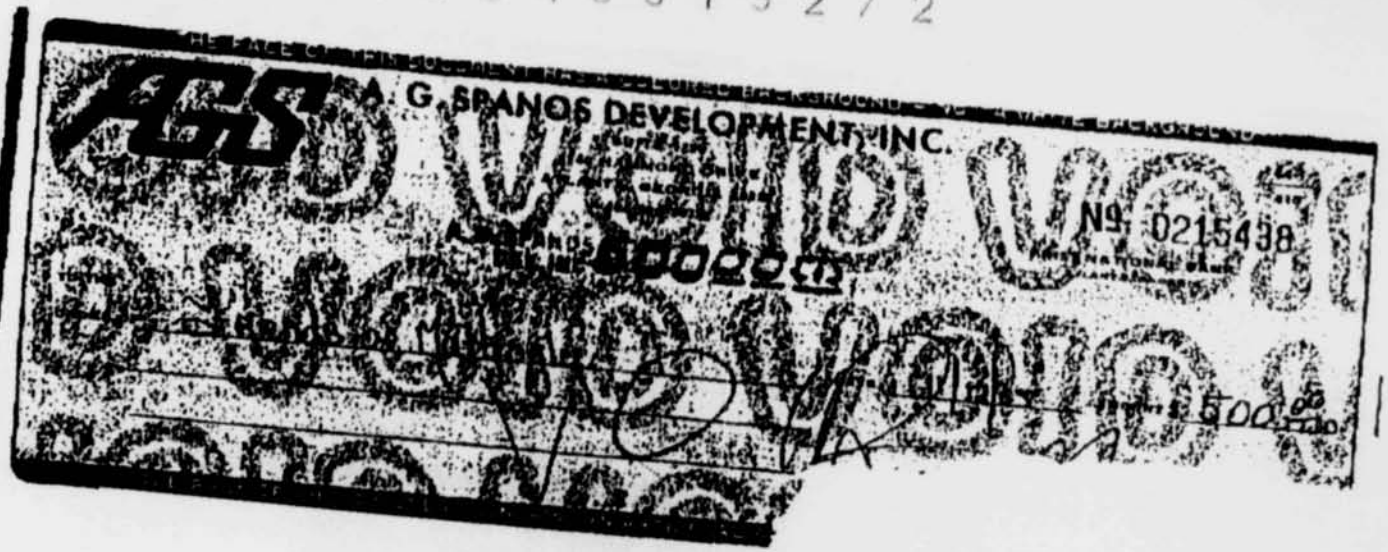
If you have any questions, please do not hesitate to call on me at (209) 478-7954. Thank you for your assistance.

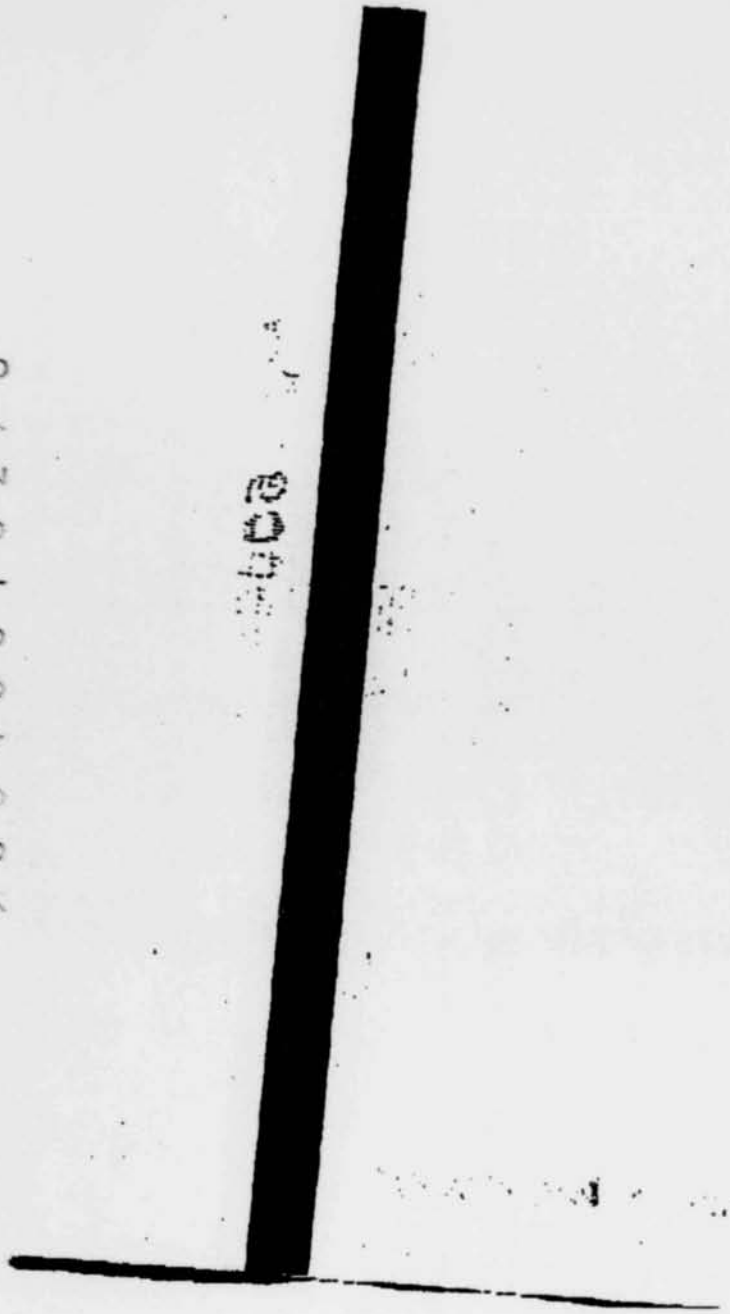
Sincerely,

Natalia Orfanos
Public Relations

2304351527 1

9304351527 2





9304351527 3

06C7757

LAW OFFICES

HURT, RICHARDSON, GARNER, TODD & CADENHEAD

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

SUITE 1400

999 PEACHTREE STREET, N.E.

ATLANTA, GEORGIA 30309-3999

(404) 870-6000

TELEX 54-3668

TELECOPIER (404) 870-6020

870-6047

WRITER'S DIRECT DIAL NUMBER

870-6127

ONE LAKESIDE COMMONS

990 HAMMOND DRIVE, SUITE 10

ATLANTA, GEORGIA 30328

(404) 399-9

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 PM 3:43

August 31, 1990

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED
AND FACSIMILE

Jeffrey Long, Esq.
Federal Election Commission
999 E. Street, N.W., Suite 657
Washington, D.C. 20463

Re: MUR 2989
Teresa C. Crossland

90 SEP -5 PM 12:12

9304351527 4

Dear Mr. Long:

As we discussed by telephone on August 29, 1990, we represent Teresa Crossland with regard to the above-referenced matter. As we also discussed, Ms. Crossland is interested in pursuing pre-probable cause conciliation pursuant to 11 C.F.R. § 111.18(d).

The Federal Election Commission's Notice of Violation states, in pertinent part, that on November 4, 1986, Ms. Crossland made a contribution to the Mack Mattingly campaign for United States Senate in the amount of $2,500, thereby exceeding the $1,000 limit per individual by $1,500. We believe that the amount in excess of that $1,000 limit is in error. This payment was made by check from a joint checking account held by Ralph Henry Crossland, Jr. and Teresa C. Crossland. Therefore, the alleged violation as to Ms. Crossland should be for a $250 excess payment not a $1,500 excess payment. Until she received your notice, she was unaware of the $1,000 per person limit.

At the time this check was written, Ralph Crossland worked for A. L. Williams Company, and he requested Teresa Crossland, then his wife, to make a payment for $2,500 to the Mattingly campaign because the A. L. Williams Company was supporting Mack Mattingly. As part of conciliation, Ms. Crossland is willing to cooperate in your ongoing investigation of the Mattingly Campaign of 1986.

Accordingly, we request that no civil penalty be imposed against Ms. Crossland.

Sincerely yours,

Stephen T. La Briola

Stephen T. La Briola
FOR THE FIRM

STL/ejb
23-WP687/15.11 10545-002
cc: File

9304351527 5

MUR 2989

Cousins Properties Incorporated

Robert P. Hunter, Jr.
Senior Vice President
Secretary and General Counsel

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 AM 11:40

August 29, 1990

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2989 - Thomas G. Cousins

Dear Mr. McGarry:

We have just received your letter of July 20, 1990 addressed to Thomas G. Cousins. Unfortunately, the letter was sent to the wrong address. Mr. Cousins no longer lives on Andrews Drive in Atlanta. It would be appreciated if, in the future, any correspondence regarding this matter would be addressed to Mr. Cousins at the address below.

Mr. Cousins is out of town and has not yet seen the letter. As soon as he returns, he will review the facts set forth in your letter and respond promptly.

Very truly yours,

Robert P. Hunter, Jr.

/kb

2500 Windy Ridge Parkway · Suite 1600 · Marietta, Georgia 30067 · 404/955-2200 · FAX 404/955-0030

2304351526

06C 7731

DON F. DeFOOR
ATTORNEY AT LAW
2175-B COUNTY LINE ROAD
DOUGLASVILLE, GEORGIA 30135

AREA CODE 404
OFFICE 920-2175

FAX
920-2478

90 SEP -3 AM 10:54

August 24, 1990

Federal Election Commission
Washington, D.C. 20463

RE: MUR 2989
BILL PILGRIM ENTERPRISES, INC.

ATTENTION: ELIZABETH CAMPBELL

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 AM 10: 10

Dear Ms. Campbell:

Pursuant to our conversation by telephone on August 24, 1990, I am enclosing the Statement of Designation of Counsel executed by William J. Pilgrim, Jr., President of Pilgrim Enterprises, Inc.

It is my clients desire to proceed with conciliation, however, he would state for the record that he was unaware that his contribution violated the Federal Election Campaign Act of 1971.

Sincerely,

Don F. DeFoor

Don F. DeFoor

2304351527 7

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: DON F. DEFOOR, ATTORNEY

ADDRESS: 2175-B COUNTY LINE ROAD
DOUGLASVILLE, GA. 30135

TELEPHONE: 404- 920-2175

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.

BILL PILGRIM ENTERPRISES, INC.

AUGUST 24, 1990
Date

BY: Bill Pilgrim
Signature BILL PILGRIM, PRESIDENT

RESPONDENT'S NAME: BILL PILGRIM ENTERPRISES, INC.

ADDRESS: 2175-A COUNTY LINE ROAD
DOUGLASVILLE, GEORGIA 30135

HOME PHONE:

BUSINESS PHONE: 404 949-1884

2304351528

OGC 7713

LAW OFFICES
Small, Craig & Werkenthin
A PROFESSIONAL CORPORATION

Facsimiles
Austin: (512) 320-9734
San Antonio: (512) 226-2648

Suite 1100, 100 Congress Avenue
Austin, Texas 78701-4099
(512) 472-8355

SAN ANTONIO OFFICE
19th Floor, NCNB Plaza, 300 Convent Street
San Antonio, Texas 78205-3738
(512) 226-2080

90 SEP -3 PM 12:18

August 31, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 36 AM 10:02

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 AM 10:06

Ms. Elizabeth Campbell
Mr. Jeffrey Long
Federal Election Commission
999 "E" Street, N.W.
Washington, D.C. 20463

CERTIFIED MAIL, RETURN
RECEIPT REQUESTED

RE: MUR 2989
Family and Marriage Resources

Dear Ms. Campbell and Mr. Long:

I am writing in response to your letter dated August 3, 1990 to my client Family and Marriage Resources. I have left messages for you explaining that my client received your letter on August 29, 1990 since it was sent to an old, out-of-date address. I am enclosing a Statement of Designation of Counsel signed by my client.

My client is conducting its own internal investigation to determine the circumstances and we will respond to you by September 13, the date 15 days from the date of receipt of your letter. I would appreciate it if you could confirm in writing that my client has until September 13, 1990 to respond.

Very truly yours,

Kathleen Ford Bay

KFB/gm/5111x
Enclosure
8419.11111

cc: Jim Powers

2304351529

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Kathleen Ford Bay

ADDRESS: Small, Craig & Werkenthin
100 Congress, Suite 1100
Austin, Texas 78701

TELEPHONE: (512) 472-8355 ext. 638

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.

8-30-90
Date

FAMILY AND MARRIAGE RESOURCES
By: [signature]
Signature
Jim Powers
President

RESPONDENT'S NAME: Family and Marriage Resources

ADDRESS: P.O. Box 90788
Austin, Texas 78709-0788
(street address: 3105 Slaughter Lane)

HOME PHONE: N/A

BUSINESS PHONE: 512/280-2234

9304351528O

06C77747

STANDARD GRAPHICS

90 AUG 31 AM 11:15

MUR 2989

August 23, 1990

Federal Election Committee
Washington, DC 20463

Gentlemen:

Due to the date of the alleged infraction I am unsure of the circumstances surrounding our donation to "Friends of Mack Mattingly."

My company is a small business and I cannot recall any other time in its history that political contributions were made; nor do we actively participate in any PAC's, business or personal.

Please forgive my ignorance in this matter.

Very truly yours,

Dan Szucs, President
Standard Southeast, Inc.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 AM 11:08

9304351528 1

Standard Graphics Headquarters 1555 Oakbrook Drive, Suite 100 Norcross (Atlanta), Georgia 30093

Atlanta (404)446-2010 | Savannah (912)925-0020 | Columbia (803)254-6018 | Jacksonville (904)398-6664 | Tallahassee (904)681-6813 | Orlando (305)293-2076

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 6, 1990

Kathleen Ford Bay, Esq.
Small, Craig & Werkenthin
100 Congress, Suite 1100
Austin, TX 78701

RE: MUR 2989
Family and Marriage
Resources

Dear Ms. Bay:

This is in response to your letter dated August 31, 1990, which we received on September 5, 1990, confirming you have until September 13, 1990 to respond to MUR 2989. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on September 13, 1990.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-5690.

Sincerely,

George F. Rishel
Assistant General Counsel

9304351552882

OGC 7781

MARK & SUSAN HURST
2929 THOMPSON MILL ROAD
GAINESVILLE, GEORGIA 30506

90 SEP -7 AM 11:03

September 5, 1990

Federal Election Commission
999 E. Street, N. W.
Washington, D. C. 20463
Attn: Jeffery Long

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -7 PM 12:11

REF: MU 2989

Dear Mr. Long,

The attached sworn statements are submitted as per our conversation 9 AM, September 5th, 1990.

Please advise me if any further action is required.

Sincerely,

Sid Cowan
Business Ass't.

9304351552833

STATEMENT

REF: MUR 2989
MARK D. HURST

During the 1986 General Election Period, I made a contribution to the Mack Mattingly Campaign of $3,000.00

I was not aware of the law limiting such contributions to $1,000.00

I am requesting the return of the excess contribution from the campaign fund manager.

SWORN THIS DAY OF 4th SEPTEMBER 1990

MD Hurst

MARK D. HURST
2929 Thompson Mill Road
Gainesville, Georgia 30506

NOTARY: Marcella Elrod

Notary Public, Hall County, Georgia
My Commission Expires May 21, 1993

9304351528 4

STATEMENT

REF: MUR 2989
SUSAN HURST

During the 1986 General Election Period, I made a contribution to the Mack Mattingly Campaign of $4,000.00

I was not aware of the law limiting such contributions to $1,000.00

I am requesting the return of the excess contribution from the campaign fund manager.

SWORN THIS DAY OF 4 SEPTEMBER 1990

Susan Hurst

SUSAN HURST
2929 Thompson Mill Road
Gainesville, Georgia 30506

NOTARY: Marcella Elrod

Notary Public, Hall County, Georgia
My Commission Expires May 21, 1993

2930435152885

THOMAS G. COUSINS
2500 WINDY RIDGE PARKWAY, SUITE 1600
MARIETTA, GEORGIA 30067
404/955-2200

FEDERAL ELECTION COMMISSION
90 SEP 10 PM 4:05

September 7, 1990

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR2989, Thomas G. Cousins

Dear Mr. McGarry,

This is in response to your letter to me of July 20, 1990 which was misdirected and which I ultimately received on August 29, 1990.

I have reviewed your letter and my own files, and I regretfully acknowledge that I made a contribution in 1986 to Senator Mattingly's reelection which exceeded the $1,000 limit described in your letter.

I was totally unaware of any such limitation on personal contributions to federal election campaigns. I had been told that my wife and I could give up to a total of $4,000. I do know that there are no such limitations in state and local elections where I have been more involved.

Frankly, I would have welcomed the $1,000 limit and would have enthusiastically complied with it had I known it to exist. I am angered and deeply offended that the Mattingly campaign accepted a contribution which on its face exceeded the limit. I am embarrassed that I did not know about the limit, but that is the business of a campaign organization. Either my check should have been returned or the excess portion should have been refunded. I would never have knowingly violated the election laws, and I regret having inadvertently done so.

2304351528 6

Since I acknowledge that my contribution exceeded the $1,000 limit, I see no reason that we should not proceed directly to "pre-probable cause conciliation."

Please contact me at the above address to advise me what further action is needed. Thank you for your assistance.

Sincerely,

T. G. Cousins

9304351152887

OGC 7858

LAW OFFICES

GLASS, McCULLOUGH, SHERRILL & HARROLD

1409 PEACHTREE STREET, N.E.

ATLANTA, GEORGIA 30309

TELEPHONE (404) 885-1500
TELEX: 54323I
TELECOPIER: (404) 892-1801

WRITER'S DIRECT NUMBER

(404)-885-6774

RECEIVED
FEDERAL ELECTION COMMISSION
90 SEP 11 AM 10:59

September 5, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 11 PM 12:21

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Office of General Counsel
Federal Elections Commission
Washington, D.C. 20463

Attention: Jeffrey Long

Re: MUR 2989
John M. Stuckey, Jr.
Request for Extension of
Time to Answer

Gentlemen:

In accordance with my telephone conversation of today's date with Mr. Jeffrey Long in your office, please accept this letter as written request for an additional thirty (30) day extension of time in which to respond to the above referenced MUR. (A previous thirty day extension was granted in this matter to expire September 7, 1990.) The within request for an additional thirty day extension in based upon the fact (i) that records of the Republican Party of Georgia relating to the contested 5/20/85 contribution in the amount of $1,000.00 are not currently available to the undersigned, and, (ii) that no current member of the staff of the Republican Party of Georgia was involved in the May, 1985 event. The $1,000.00 contribution in question was made to purchase two tickets to the "Georgia Tribute To The President", an event which, in the recollection of the undersigned, was a fund raising activity of the Republican Party of Georgia and not the Campaign to Re-elect Senator Mattingly.

Thank you very much for your attention to this matter.

Sincerely,

John M. Stuckey, Jr.

(le/4)

9304351528 8

OGC 7845

LAW OFFICES OF
FRIEDMAN AND SISSMAN, P.C.
ATTORNEYS AT LAW
SUITE 3010, 100 NORTH MAIN BUILDING
MEMPHIS, TENNESSEE 38103-5015

ROBERT MICHAEL FRIEDMAN
BEN G. SISSMAN
WILLIAM W. HEATON
LAWRENCE W. WHITE
BETH COCKE

PHONE (901) 526-5975
FACSIMILE (901) 527-3633

OFFICE MANAGER
MS. LYNN M. CORLEY

PARALEGAL
MS. NANCY M. MORROW

September 7, 1990

ORIGINAL SENT BY FACSIMILE
TRANSMISSION TO (202) 376-5280
Honorable Elizabeth Campbell
Assistant General Counsel
Federal Election Commission
Atlanta, Georgia

RE: My Client: Mr. Kenneth Wayne Anderton
F.E.C. Number: MUR 2989
Alleged Violation of Title 2, United States Code, Section 441a(a)(1)(A)
Initial "Reason to Believe" Letter From Commission: July 20, 1990
Law Offices of Friedman and Sissman, P.C., Initial Response Letter: August 13, 1990
Correspondence of Honorable George F. Rishel: August 22, 1990

90 SEP 12 PM 12:02 90 SEP 12 AM 11:21

2304351529

Dear Ms. Campbell:

Please allow this correspondence to serve as a written follow-up and to confirm our lengthy and amicable long-distance telephone conference conducted on Wednesday, September 5, 1990, in regard to the above-captioned matter. As a predicate to our conversation, I advised you that I had been retained to represent the above-referenced individual, Mr. Kenneth W. Anderton, and I do enclose herewith a Statement of Designation of Counsel executed by said individual for your perusal and inclusion in your records.

Further, during our conference, I did inform you that my client is employed as a National Sales Director for A. L. Williams, a national insurance company. It was in said employment capacity, and through said company and its Chief Executive Officer, Mr. Art Williams, that my client and his former wife were solicited and induced to make the political contribution to "Friends of Mattingly" which is the subject of the Commission's inquiry, in exchange for a photo opportunity with former President of the United States, Ronald Reagan, and as a part of a company publicity/promotional event.

Further, as I explained during our previous discussion, Mr. Anderton and his former spouse were specifically advised by corporate general counsel for and on behalf of A. L. Williams, that their political contribution/purchase of tickets for the "Mattingly Rally and photo opportunity" were fully in compliance with Federal law. Contemporaneously to making said contribution, they were provided by the legal representatives of the A. L.

Williams Company with a form/letter which was signed and sent via United States Mail to Mr. Robert Mason, Finance Director of "Friends of Mattingly", clarifying the distribution of this joint political contribution. In said letter to Mr. Mason, a copy of which is herein enclosed for your consideration, Mr. Anderton clearly designated and identified his individual contribution to this campaign to be in the sum of $1,000.00, his former spouse, Darlene Anderton's individual contribution to this campaign to be in the sum of $1,000.00, and stated that each of them were contributing an additional $250.00 to offset the outstanding primary debt incurred by this Campaign Committee.

At all times pertinent herein, my client and his former spouse sincerely and reasonably believed that their actions were in total compliance with any and all existent and applicable Federal, State, and/or local election laws. They made this joint contribution only upon the request and inducement of Mr. Anderton's employer, Mr. Art Williams, and in reasonable reliance upon the stated advice and opinion of Mr. Williams' legal counsel that said joint contribution was in all respects proper and lawful.

Consistent with our conversation, it is presently my understanding that the Federal Election Commission, upon initial investigation, has preliminarily concluded that the "Friends of Mattingly" Committee did not, in fact, have an outstanding primary debt, as Mr. Anderton was patently and affirmatively led to believe, and that if this preliminary determination is finally confirmed by the Commission, that my client may have inadvertently and unknowingly made an improper contribution pursuant to the provisions of Title 2, United States Code, Section 441a(a)(1)(A) which sets forth dollar limitations on contributions by an individual.

Further, it is my understanding that the Commission is still engaged in the process of completing its investigation of this matter, and that at this juncture, no final determination has been made pertaining to the Mattingly Campaign. As I advised you, previous to contacting your office, I did communicate with Mr. Steve Mister, Esquire, whose law firm in Washington, D.C., is engaged in handling a number of cases similar to that of my client involving A. L. Williams' employees and the "Friends of Mattingly" Campaign Committee. He advised, and you confirmed, that representatives of his law office had visited with you in Atlanta, and had secured an undesignated extension of time in which to file with the Commission factual and/or legal information to demonstrate that no action should be taken against

2304351520

their clients, and/or to enter into pre-probable cause conciliation.

Consistent with our discussion and pursuant to your suggestion, I do hereby request that this communication be received and considered both as a partial response to the Commission's M.U.R. Notice letter, in as much as I do believe that it set forth a factual/legal basis which demonstrates that the Commission should decline to take any adverse legal action against my client and/or his former spouse, and as a specific written request that I be afforded an extension of time similar to that granted to Attorneys Potter, Laham, and Mister, so that I can (1) complete my investigation into this matter; (2) amend and supplement, as necessary, the information demonstrating that no action should be taken against my client; (3) be fully apprised of the Commission's final determination concerning the primary and general election finances of the "Friends of Mattingly" Campaign Committee; and, (4) so that I can be afforded an opportunity to consider engaging in pre-probable cause conciliation in this cause consistent with the provisions of 11 C.F.R. Section 111.18(d).

Your kind consideration, suggestions, and cooperation have been greatly appreciated, and I do look forward to working with you in the future with an end toward amicably resolving this matter. With kindest personal regards, I remain,

Yours very truly,

FRIEDMAN AND SISSMAN, P.C.

Robert M. Friedman

Robert M. Friedman

RMF/lc

cc: Honorable John W. McGarry
Vice Chairman, Federal Election Commission

Mr. Kenneth Wayne Anderton

Honorable George F. Rishel
Assistant General Counsel, Federal Election Commission

2304351529 1

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: 10-9-86

W Wayne Anderton

Robert Mason

rec'd 10/12/86

23004351326222

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Robert M. Friedman

ADDRESS: Suite 3010
100 N. Main Bldg.
Memphis, Tennessee 38103

TELEPHONE: 901/526-5975

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.

8/22/90
Date

Kenneth W. Anderton
Signature

RESPONDENT'S NAME: Kenneth W. Anderton

ADDRESS: Route 1 Box 340B
Collierville, Tennessee 38107

HOME PHONE:

BUSINESS PHONE: 901/756-1913

9304351529 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stubbs Shipping Company
P.O. Box 194
Sea Island, GA 31561

RE: MUR 2989
Stubbs Shipping Company

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Stubbs Shipping Company violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Stubbs Shipping Company.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

9304351529 4

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stricklands Pharmacy
111 Bonard
Glennville, GA 30427

RE: MUR 2989
Stricklands Pharmacy

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Stricklands Pharmacy violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Stricklands Pharmacy.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

9304351529 5

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Southern Energy
P.O. Box 960
Brunswick, GA 31520

RE: MUR 2989
Southern Energy

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Southern Energy violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Southern Energy.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

2304351529 6

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert J. Shircliff and Associates
2529 Gulf Life Tower
Jacksonville, FL 32207

RE: MUR 2989
Robert J. Shircliff and Associates

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Robert J. Shircliff and Associates violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Robert J. Shircliff and Associates.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

9304351152997

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Pickett, Pickett & Pickett
Edge Building
225 N. Main Street
Jasper, GA 30143

RE: MUR 2989
Pickett, Pickett & Pickett

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Pickett, Pickett & Pickett.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

93043515298

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Peoples' Transportation Services, Ltd.
P.O. Box 491261
Atlanta, GA 30349

RE: MUR 2989
Peoples' Transportation
Services, Ltd.

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Peoples' Transportation Services, Ltd. violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Peoples' Transportation Services, Ltd.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

2304351529 9

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

OB-GYN Associates, P.A.
72 Plaza Highway
Marietta, GA 30060

RE: MUR 2989
OB-GYN Associates, P.A.

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe OB-GYN Associates, P.A. violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against OB-GYN Associates, P.A.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

2304351530O

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Morris Brown College
643 Martin Luther King, Jr. Dr., N.W.
Atlanta, GA 30314

RE: MUR 2989
Morris Brown College

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Morris Brown College violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Morris Brown College.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

9304351530 1

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lakeside Farm
Route 1, Box 223
Hayesville, N.C. 28904

RE: MUR 2989
Lakeside Farm

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Lakeside Farm violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Lakeside Farm.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Farmers Tobacco Warehouse
P.O. Box 432
Vidalia, GA 30474

RE: MUR 2989
Farmers Tobacco Warehouse

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Farmers Tobacco Warehouse violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Farmers Tobacco Warehouse.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

9304351530 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Armada Vehicle Rental, Inc.
P.O. Box 48405
Doraville, GA 30362

RE: MUR 2989
Armada Vehicle Rental, Inc.

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Armada Vehicle Rental, Inc. violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Armada Vehicle Rental, Inc.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

2304351530 4

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard A. Walker
4904 Eisenhower Blvd.
Suite 151
Tampa, FL 33634

RE: MUR 2989

Dear Mr. Walker:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

2304351530 5

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Lafayette Walker
10012 Sorrel Avenue
Potomac, MD 20854

RE: MUR 2989

Dear Mr. Walker:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

9304351530 6

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Lee Turley
Summit House 1805
280 S. Collier Blvd.
Marco Island, FL 33937

RE: MUR 2989

Dear Mr. Turley:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

2304351530 7

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Cynthia Thawley
7115 Raich Dr.
San Jose, CA 95120

RE: MUR 2989

Dear Ms. Thawley:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

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Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

2304351530 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

W. L. Shirley
121 Grogan Street
Lavonia, GA 30553

RE: MUR 2989

Dear Mr. Shirley:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

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Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

9304351530 9

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joe W. Rogers, Jr.
2133 Lavista Exec. Park
Tucker, GA 30084

RE: MUR 2989

Dear Mr. Rogers:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

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Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

9304351531 0

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bryce Peterson
2324 Williamsburg Circle
West Jordan, VT 84084

RE: MUR 2989

Dear Mr. Peterson:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

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Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

2304351531

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Todd McMahon
P.O. Box 1807
Danville, CA 94526

RE: MUR 2989

Dear Mr. McMahon:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

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Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

2304351531 2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles A. Lotz, Jr.
725 Tanglewood Trail
Atlanta, GA 30327

RE: MUR 2989

Dear Mr. Lotz:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

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Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

9304351531 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John B. Keeble
250 Piedmont Ave., Suite 1900
Atlanta, GA 30365

RE: MUR 2989

Dear Mr. Keeble:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

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Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George J. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

9304351531 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Thomas S. Hartzog
Box 80728
Atlanta, GA 03066

RE: MUR 2989

Dear Mr. Hartzog:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

2304351531 5

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ron Bloomingkemper
10203 Birchridge Dr., Suite W
Humble, TX 77338

RE: MUR 2989

Dear Mr. Bloomingkemper:

On July 20, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe you violated 2 U.S.C. §§ 441a(a)(1)(A). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against you.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated July 20, 1990
Factual and Legal Analysis

9304351531 6

00C7867

LAW OFFICES
FALLIN AND McINTOSH
39 NORTH MAIN STREET
MOULTRIE, GEORGIA 31776

90 SEP 14 AM 11:23

ugust 24, 1990

BILLY G. FALLIN
WILLIAM M. McINTOSH

TELEPHONE 912 985 5881
FAX 912 985 0659
POST OFFICE BOX 250

RECEIVED
FEDERAL ELECTION COMMISSION
90 SEP 14 PM 1:01

Mr. Jeffrey Long
Office of General Federal
Election Commission
999 E. Street
Washington, D.C. 20463

RE: MUR 2989
Moultrie Surgical Associates, P.C.

Dear Mr. Long:

Thank you for talking with me by telephone this week concerning the alleged violation of the "Act" by my client, Moultrie Surgical Associates, P.C.

Moultrie Surgical Associates, P.C. is a professional corporation now consisting of three general surgeons (two at the time of the alleged infraction). During the subject period, the surgical practice was carried on by Dr. Michael J. Haney and Dr. Thomas L. Estes. Their practice is located in Moultrie, Georgia, a town of approximately sixteen thousand residents. Drs. Haney and Estes serve as the sole surgeons for this rural area and county. They have an office staff of four to five nurses/receptionists.

The political contribution which is the subject matter of this inquiry consisted of a joint $200.00 contribution to a Georgia senatorial candidate in 1986, four years ago. Mr. Long, I am writing to give you some background concerning the source of this contribution and the circumstances surrounding it being given, hopefully to place the matter in perspective and relative importance in the general scheme of things.

If you examine the subject check you will see that the doctors' names are listed individually on the upper "remittance advice" portion. This indicates a clear intent to show from whom the funds were being sent - i.e., individuals. Upon discussion with the doctors involved, it is apparent that in their usual hectic schedules they were approached, probably by a local friend, to support a certain candidate. Accordingly, they agreed and had no second thoughts about the procedure of translating this into an actual donation. Delegating this, they simply asked their secretary to make the donation, totally ignorant of the technicalities or intricacies of the Federal Election Campaign Act of 1971, 2 U.S.C. §441 b(a). They may be charged with knowledge of the law as every person is with any law, but my

2304351537

point is, in actuality, they simply made a contribution and each $100.00 of the $200.00 contribution was charged to their respective draw accounts. Bookkeeping, or business in general, is not the strong point of these, or, I suspect, any other physicians that I know and represent.

Simply put, Mr. Long, these physicians had no intent whatsoever to contravene any law of statute, federal or otherwise. They merely made a contribution in response to a request for such, and the contribution itself was made through a business check prepared by their employee.

I feel the matter of perspective is paramount in this situation. Two rural, extremely busy, conscientious physicians who are totally ignorant of election campaign technicalities made a relatively insignificant - $200.00 - contribution to a campaign four years ago. There is or was no intent of any nature to skirt any law. These doctors did not even have an inkling or passing thought that this insignificant act would entail the least problem. Is it reasonable that they would have made such a contribution knowing that they would have to pay their lawyer more to answer charges in the matter than the amount of the contribution itself?

My point, Mr. Long, is that based upon the circumstances in this particular case, it would be eminently reasonable for the matter to be laid to rest at this point. The purpose of this letter is to avail ourselves of the opportunity as stated in your letter, to demonstrate that no further action should be taken against the corporation.

Drs. Haney and Estes are gifted, dedicated surgeons who are well-respected in this community. Their personal reputations are impeccable. I would submit to you that if a technical infraction occurred, they will be the first to admit that their total ignorance of the election law and fleeting involvement with the mechanics of the donation are the basis of this matter, and that there was no intent of any nature to violate either the letter or spirit of any law.

I would appreciate your considered assessment of this case. I feel that once considered, the case will be put to rest.

Respectfully submitted,

FALLIN & McINTOSH

William M. McIntosh

WMM:lg

9304351-5318

06C7860

LAW OFFICES

Small, Craig & Werkenthin

A PROFESSIONAL CORPORATION

Facsimiles
Austin (512) 320-9734
San Antonio (512) 226-2646

Suite 1100, 100 Congress Avenue
Austin, Texas 78701-4099
(512) 472-8355

SAN ANTONIO OFFICE
19th Floor, NCNB Plaza, 300 Convent Street
San Antonio, Texas 78205-3738
(512) 226-2060

90 SEP 14 AM 11:48

September 10, 1990

Ms. Elizabeth Campbell
Mr. Jeffrey Long
Federal Election Commission
999 "E" Street, N.W.
Washington, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: MUR 2989
Family and Marriage Resources

90 SEP 14 PM 1:01

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Dear Ms. Campbell and Mr. Long:

I am responding to your letter dated August 3, 1990. My client, Family and Marriage Resources, has conducted its own internal investigation and discovered the following.

The Executive Director of Family and Marriage Resources had all check records searched from the time Family and Marriage Resources was incorporated on April 4, 1985. The only check written to what turned out to a political race was check number 2022 on September 10, 1986, to "Friends of Mattingly" in the amount of $300.00. A copy of this check is attached. Mr. Powers believes that he sent the check in order to purchase two tickets to a Reagan rally which was to be held on October 8, 1986. Mr. Powers planned to be in Atlanta on business at that time. (As it turned out, the business trip did not take place). Mr. Powers did not know that purchasing two tickets to a political function was a violation of the Federal Election Campaign Act. It was Mr. Powers who wrote and signed the check. (In investigating this matter, we have learned from local people who work on local and state-wide political campaigns that when they receive a check from a corporation, they return it with the advice that corporations are not allowed to make campaign contributions. Family and Marriage Resources' check was not so returned.)

Family and Marriage Resources does not have in-house counsel to advise them on matters such as what is and is not a

2304351319

political contribution. Instead, Family and Marriage Resources uses outside counsel of which I am one and my primary expertise is in state and federal laws that relate to charities. I was not doing any work for Family and Marriage Resources in 1986. Family and Marriage Resources does not have a political action committee. Mr. Powers did not know the law and certainly did not intend to break it.

Based on the results of Family and Marriage Resources' internal investigation and the fact that a $300.00 check was written to the Mattingly campaign, Family and Marriage Resources would like to pursue with you a pre-probable cause conciliation. Mr. Powers is willing to write a check to the corporation for the $300.00, if that is acceptable to you.

I am also enclosing a copy of Family and Marriage Resources' Restated Articles filed on December 6, 1988 with the Texas Secretary of State. They indicate that the corporation's registered address had been changed from the South Lamar address. Your letter went to the old address -- the address on the check -- and was not received until August 29, 1990. We are, therefore, responding within the 15-day allowable period. I have previously sent you a Statement of Designation of Counsel and am enclosing another copy of my cover letter and the Statement.

Very truly yours,

Kathleen Ford Bay

KFB/rmb/5141x/8419.11111
Enclosures

cc: Mr. Jim Powers
President
Family and Marriage Resources
P.O. Box 90788
Austin, Texas 78709-0788

9304351 53320

CONGRESS NATIONAL BANK
P.O. Box 2902, Austin, Texas 78769

FAMILY & MARRIAGE RESOURCES
1221 [redacted]H LAMAR, SUITE A 447-9000
AUSTIN, TX 78704

2022

[redacted] 111211535

88-1153/1149

Sept 10 19 86

PAY TO THE ORDER OF Friends of Mattingly $ 300.00

Three hundred and no/100---------- DOLLARS

	2 tickets polictal rally
	Oct. 8th - Reagan @$150.00 each
for	Jim & Maripat Powers

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

[redacted] AUSTIN, TX

[redacted]

9304351532 1

06C7879

WILEY, REIN & FIELDING

90 SEP 17 AM 10:12

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

September 14, 1990

Elizabeth Campbell, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2989

Dear Ms. Campbell:

Please find enclosed Designation of Counsel Forms for Bryce Peterson, George J. Martonik, A. Danny Murray and Richard A. Walker in the above-captioned matter.

Although I understand that these gentlemen may have previously contacted your office directly, please direct all future communication regarding this Matter to my office.

Sincerely,

Jan W. Baran/apb

Jan Witold Baran

Encls.

RECEIVED
FEDERAL ELECTION COMMISSION
90 SEP 17 PM 12:33
OFFICE OF GENERAL COUNSEL

9304351532 2

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan Witold Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W., Suite 900
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

8-26-90
Date

Signature

RESPONDENT'S NAME: Bryce Peterson

ADDRESS: 2334 Williamsburg Cir.
W. Jordan, Ut 84084

HOME PHONE:

BUSINESS PHONE: 801-768-8968

2304351532 3

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K St., N.W.
Washington, D.C. 20006

TELEPHONE: 202-429-7330

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

George J. MARTONIK
Signature

RESPONDENT'S NAME: George J. Martonik

ADDRESS: 11512 Gravelly Lake Dr., S.W.
Tacoma, WA 98499

HOME PHONE:

BUSINESS PHONE:

9304351532 4

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7330

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.

8/19/90
Date

L. Danny Murray
Signature

RESPONDENT'S NAME: L. Danny Murray

ADDRESS: 1590 Timberline Trace
Snellville Georgia 30278

HOME PHONE:

BUSINESS PHONE:

2304351533 25

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: 202-429-7330

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.

8-28-90
Date

Richard A. Walker
Signature

RESPONDENT'S NAME: Richard A. Walker

ADDRESS: 4904 Eisenhower Blvd
Suite 151
Tampa, Fl 33634

HOME PHONE:

BUSINESS PHONE:

93043515532 6

WILLIAM E. TIMMONS
4426 GARFIELD STREET N. W.
WASHINGTON, D. C. 20007

RECEIVED
90 SEP 14 PM 2:55

September 13, 1990

Dear Mr. McGarry:

This is in response to your July 20th letter (MUR 2989), postmarked September 11th and received on September 12th. I have an explanation for the apparent violation.

"Friends of Mattingly" held a reception at the Hyatt Regency Hotel on February 21, 1985 in honor of Senator Mack Mattingly (R-GA). I received an invitation and sent my personal check for $1,000 on February 11, 1985.

I attended the event but forgot that I had previously contributed and wrote another check on February 21st for $1,000.

When my bank statement arrived in early March I realized I had contributed twice and requested a refund. On April 5, 1985 I received a refund of $1,000 and deposited the check in my personal bank account. Unfortunately, I do not have a copy of the refund check, but your audit of campaign expenditures should show a refund check to me in this amount. The date would have been late March or early April, 1985.

The FEC Factual and Legal Analysis included with your letter shows that I contributed the two $1,000 checks for a total of $2,000. Yet the excessive amount is listed as $1,750 which would mean my legal limit to be only $250. I am at a loss to understand this and request an explanation.

Sincerely,

William E. Timmons

Mr. John W. McGarry
Vice Chairman
Federal Election Commission
Washington, DC 20463

Enclosure: MUR 2989 Factual and Legal Analysis

90 SEP 17 AM 5:00
RECEIVED
FEDERAL ELECTION COMMISSION
90 SEP 17 AM 11:52
RECEIVED
FEDERAL ELECTION COMMISSION

9304351532 7

0GC7882

LAW OFFICES

HURT, RICHARDSON, GARNER, TODD & CADENHEAD

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

1400 PEACHTREE PLACE TOWER

999 PEACHTREE STREET, N.E.

ATLANTA, GEORGIA 30309-3999

(404) 870-6000

TELEX 54-3668

TELECOPIER (404) 870-6020

870-6047

WRITER'S DIRECT DIAL NUMBER

870-6127

ONE LAKESIDE COMMONS

990 HAMMOND DRIVE, SUITE 1050

ATLANTA, GEORGIA 30328

(404) 399-9070

90 SEP 17 AM 10:00

September 13, 1990

Jeffrey Long, Esq.
Federal Election Commission
999 E. Street, N.W., Suite 657
Washington, D.C. 20463

Re: MUR 2989
Teresa C. Crossland

90 SEP 17 PM 12:33

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

2304351532 8

Dear Mr. Long:

Enclosed please find a letter dated September 10, 1990 from Allen Billingsley to the undersigned, as well as that letter's enclosure of banking activities of the joint banking account of Teresa Crossland and her former husband, Ralph Henry Crossland, Jr.

As the account records show, the subject check was not negotiated during the most logical period of time for such a negotiation, that being from the date the check was written through and including the November, 1986 election. Moreover, Mr. Billingsley has informed the undersigned that Ms. Crossland's bank has no record of negotiation of the check at any time. Based upon this information, we believe that the check written to "Friends of Mattingly" was not negotiated.

Please contact the undersigned at his direct dial number to discuss this matter further. Thank you in advance for the time and effort you will spend on this matter.

Sincerely yours,

Stephen T. La Briola

Stephen T. La Briola
FOR THE FIRM

STL/ejb
44-WP687/15.11 10545-002
Enclosures
cc: File

ETOWAH BANK
MEMBER F.D.I.C.

September 10, 1990

Mr. Steve La Briola
Hurt, Richardson, Garner, Todd & Cadenhead
999 Peachtree Street, N. E., Suite 1400
Atlanta, Georgia 30309-3999

Dear Mr. La Briola:

As you are aware, Teresa Crossland requested that the Etowah Bank provide a copy of a negotiated item in the amount of $2,500.00, payable to Friends of Mattingly.

The dates provided ranged from September 1, 1986 through November 30, 1986.

After diligent research into Ms. Crossland's account, I am unable to locate this item. All copies of Ms. Crossland's account, dated September 15, 1986 through November 15, 1986, are enclosed.

I certify that these copies are true and exact replicas of original documents.

If you have any questions or need additional information, feel free to call.

Sincerely,

J. Alan Billingsley
Assistant Vice President & Operations Manager

JAB/lag

enclosures

cc: Teresa Crossland

Lisa A. Garrison
Notary Public
Notary Public, Cherokee County, Georgia
My Commission Expires Sept 23 19[illegible]

9304351532 9

Ed Voyles Chrysler-Plymouth
789 Cobb Parkway, S.E. Phone (404) 429-1100
MARIETTA, GEORGIA 30062

CHRYSLER
Plymouth

06C7902

MUR2989

RECEIVED
FEDERAL ELECTION COMMISSION
90 SEP 18 PM 12:32

Sept 11, 1990

Federal Election Commission
Washington, D.C. 20463

Dear Gentlemen:

Please be advised that William F. Voyles, did make a contribution totaling $275 to Mack Mattingly, in connection with the 1986 General Election in Georgia. Not knowing and willfully he issued payment through Ed Voyles Chrysler Plymouth, Inc. ("the Corporation") in place of issuing payment through his personal funds.

We apologize for this misunderstanding and will see that it does not happen again.

We do not dispute.

Sincerely,

Barry W. Banister
GENERAL MANAGER
ED VOYLES CHRYSLER PLYMOUTH INC.

90 SEP 18 AM 9:40

AUTHORIZED DEALER CHRYSLER MOTORS CORPORATION

23043515330

MUR 2989

OGC 7444

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463
ATTN: GEORGE F. RISHER,
ASSISTANT GENERAL COUNSEL

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP 24 AM 11:09

SEPTEMBER 19, 1990

90 SEP 24 PM 2:50

DEAR MR. RISHER:

AM IN RECEIPT OF YOUR CERTIFIED LETTER THIS DATE, AND WOULD LIKE TO ELABORATE MY REASON FOR NOT REPLYING SOONER. THE FACT IS THAT LAKESIDE FARM IS NOT NOW, NOR HAS IT EVER BEEN, INCORPORATED.

THE CONTRIBUTION IN QUESTION WAS MADE IN THE FORM OF A CHECK DRAWN ON LAKESIDE FARM, A PERSONAL ACCOUNT OF MINE AND MY WIFE, PAULINE H. WOODARD. LAKESIDE FARM IS THE NAME OF OUR FARM, BUT IT IS NOT A CORPORATION.

HOPE THIS RESOLVES ANY MISUNDERSTANDING THERE MIGHT HAVE BEEN.

SINCERELY,

Frank L. Woodard

~~Frank L. Woodard~~

2304351533 1

OB-GYN ASSOCIATES, P.A.
72 PLAZA WAY
MARIETTA, GEORGIA 30060

OBSTETRICS
GYNECOLOGY
TEL 422-8700

GOODMAN B. ESPY, III, M.D.
TERRY V. KELLEY, M.D.
HARRY T. HARVIN, JR., M.D.
L. RICHARD BARDWELL, M.D.

September 20, 1990

TO: Federal Election Commission

This is in response to the letter I received dated August 3, 1990.

I did not intentionally write a check from OB-GYN Associates, a corporation account to the Matt Mattingley campaign fund.

One of the doctors in this group had ask that I send a contribution to the campaign, and not knowing that it was not appropriate to do so from the office account, I did so without thought.

IF you need anything else concerning this, please let me know.

Carolyn Ivey
Bookkeeper-Secretary
for G. Espy, III

RECEIVED
FEDERAL ELECTION COMMISSION
90 SEP 24 AM 9:2

9304351533 2

00C7957

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP 24 AM 9:45

ARMADA
VEHICLE RENTAL, INC.

Federal Election Commission
Washington, DC 20463

Ms. Lee Ann Elliott

Re: MUR 2989

Dear Ms. Elliott,

In response to the alleged violation of 2 U.S.C> 441b(a) by Armada, our records indicate outstanding invoices #1404, #1446, and #1447 (copies attached) for Matt Mattingly's campaign. These invoices were billed but never paid. These vehicles were not a contribution to the Mattingly Campaign-- we have written them off as uncollectible.

90 SEP 24 PM 2:54

Sorry for the delay. My company is a small family operation and we were not using a computer in 1986. Also, due to the size of our business I cannot afford to hire a Washington lawyer for this matter.

It is hard for me to understand why y'all think I helped Mattingly when I was stiffed by him. I can assure you that I'm not the only one he didn't pay.

I am awaiting your response.

Sincerely,

Ray Miller

Ray Miller
President

9304351533

P. O. BOX 48405 • DORAVILLE, GEORGIA 30362 • (404) 455-0120

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

September 14, 1990

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

SUBJECT: MUR 2989
Request for Extension of Time

On June 19, 1990, the Commission found reason to believe Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), and 441b(a), and 11 C.F.R. § 110.6(c)(3). Also on the same date the Commission found reason to believe 72 individuals had violated 2 U.S.C. § 441a(a)(1)(A), 17 political committees had violated 2 U.S.C. § 441a(a), and 55 corporations had violated 2 U.S.C. § 441b(a). On August 3, 1990, the Commission found reason to believe two additional individuals violated 2 U.S.C. § 441a(a)(1)(A).

John M. Stuckey, Jr., is one of the individuals whom the Commission found that there was reason to believe violated 2 U.S.C. § 441a(a)(1)(A). On July 20, 1990, a letter and factual and legal analysis were mailed to Mr. Stuckey, notifying him of the Commission's findings. On August 10, 1990, this Office granted Mr. Stuckey an extension of 30 days, until September 7, 1990, to respond to the Commission's findings to enable him to retrieve his check records and other financial data relating to his 1984 and 1985 contributions. On September 11, 1990, Mr. Stuckey requested an additional thirty days to respond. See Attachment. As noted in the attached letter, Mr. Stuckey needs more time to locate information pertaining to his contributions.

The Office of the General Counsel recommends that the Commission grant the requested extension.

RECOMMENDATIONS

1. Grant an additional extension of thirty days to John M. Stuckey, Jr.

2. Approve the appropriate letter.

Attachment
1. Request for Extension

9304351533 4

OGC

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
John M. Stuckey, Jr. - Request for Extension of Time to Answer.	)	MUR 2989

CERTIFICATION

I, Marjorie W Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 20, 1990, the Commission decided by a vote of 5-0 to take the following actions in MUR 2989:

1. Grant an additional extension of thirty days to John M. Stuckey, Jr., as recommended in the General Counsel's memorandum dated September 14, 1990.

2. Approve the letter, as recommended in the General Counsel's memorandum dated September 14, 1990.

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

Attest:

9-20-90
Date

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

Received in the Secretariat: Fri., Sept. 14, 1990 11:42 a.m.
Circulated to the Commission: Mon., Sept. 17, 1990 11:00 a.m.
Deadline of vote: Thurs., Sept. 20, 1990 4:00 p.m.

dr

9304351533 5

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 27, 1990

John M. Stuckey, Jr.
Glass, McCullough, Sherrill & Harrold
1409 Peachtree Street, N.E.
Atlanta, GA 30309

RE: MUR 2989
John M. Stuckey, Jr.

Dear Mr. Stuckey:

This is in response to your letter dated September 5, 1990, which we received on September 11, 1990, requesting an extension of 30 days to respond to MUR 2989. After considering the circumstances presented in your letter, the Commission has granted the requested extension. Accordingly, your response is due by the close of business on October 8, 1990.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351553336

OGC 8007

DOW, LOHNES & ALBERTSON
ATTORNEYS AT LAW
1255 TWENTY-THIRD STREET
WASHINGTON, D. C. 20037

TELEPHONE (202) 857-2500

JOHN S. LOGAN
DIRECT DIAL NO.
857-2640

TELECOPIER (202) 857-2900
CABLE "DOWLA"
TELEX 425546

September 27, 1990

90 SEP 27 PM 4:44

VIA HAND DELIVERY

Jeffrey Long, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2989
Rankin Smith

Dear Mr. Long:

As you discussed with Jim Treanor and me earlier today, I am writing to confirm certain aspects of our conversation, to provide you with a Statement of Designation of Counsel for this matter, and to request an extension of time within which to respond to the letter of Vice/Chairman McGarry to Mr. Smith.

First, I have enclosed an executed Statement of Designation of Counsel for your records. Correspondence regarding this matter should be addressed to either Mr. Treanor or me, with a copy to Mr. Smith.

Second, I wish to confirm our understanding regarding Mr. Smith's receipt of Vice Chairman McGarry's letter. As we explained during our conversation, the letter was misaddressed, and Mr. Smith did not actually receive it until Monday, September 17. Because the time for response did not begin until the letter was received, Mr. Smith's response is due on October 2, next Tuesday. As you requested, we are providing Mr. Smith's correct address. That address is included on the Statement of Designation of Counsel.

Finally, I hereby request an extension of time to respond to Vice Chairman McGarry's letter. As is clear from our conversation earlier today, there are many apparent discrepancies between the facts asserted in the Commission's Factual and Legal

2304351533 /

Analysis, the filings made by Friends of Mattingly, the FCC data base and Mr. Smith's records and recollections of the contributions. For instance, the Factual and Legal Analysis shows a contribution of $1,000 on July 18, 1985 for the August 12, 1986 primary election, while the 1985 year-end Form 3X report filed by the Friends of Mattingly shows an $800 contribution on that date towards the general election. It is unlikely that we will be able to unravel all of these discrepancies before next Tuesday. For that reason, we respectfully request an extension of twenty days, until Monday, October 22, for our response to the Commission's tentative findings.

In the interim, I would like to reiterate our willingness to resolve this matter through informal meetings or the Commission's conciliation process. We believe that the best way to resolve discrepancies like the one described above may be for all concerned to work through the available information in order to reach a consensus as to the appropriate actions by the Commission and Mr. Smith.

Please call me at 857-640 or Jim Treanor at 857-2685 if any questions should arise in regard to this matter.

Respectfully submitted,

John S. Logan

JSL/jgh
Enclosure

9304351533 8

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: James A. Treanor, III, Esq.
John S. Logan, Esq.

ADDRESS: Dow, Lohnes & Albertson
1255 23rd St., NW, Suite 500
Washington, DC 20037

TELEPHONE: (202) 857-2685/(202) 857-2640

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.

September 20, 1990
Date

Signature

RESPONDENT'S NAME: Rankin M. Smith, Sr.

ADDRESS: 950 E. Paces Ferry Road
Suite 2930
Atlanta, Georgia 30326

HOME PHONE:

BUSINESS PHONE: 404-261-6661

9304355339

OGC 8018

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP 28 AM 11:23

Ron Bloomingkemper
National Sales Director

9/27/90

To: Jeff Long

It was my Reolection that the funds contributed were for the Regan campaign & was for the Priveledge of Having our Picture made with Ronald Regan which we did.

Thank you

Ron Bloomingkemper

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP 28 PM 3:34

23043515340

10203 Birchridge Dr. #W, Humble, TX 77338 (713) 446-2249
Representing: Massachusetts Indemnity & Life Insurance Company / Regional Office: Atlanta, Georgia
Registered Representative: First American National Securities, Incorporated

OGC 8034

STUBBS SHIPPING COMPANY

Post Office Drawer 1543
Fernandina Beach, FL 32034

John A. Stubbs
PRESIDENT

TELEPHONE:
(904) 261-0048
TLX: 441734 NSAU UI
FAX (904) 261-4407

September 26, 1990

MUR 2989

Federal Election Commission
Washington, D.C. 20463
Attn: Ms. George Riskel
Asst. General Counsel

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT -1 AM 11:38

Re: $700 Contribution

Gentlemen:

Stubbs Shipping is no longer an active corporation. At the time of the contribution, either the contribution was believed to be legal or my accountant (Deloach & Co of Brunswick, Ga.) charged the contribution to my personal account. This was frequently done as well as me advancing money to the corporation as it was owned 100% by myself.

Sincerely,
John A. Stubbs

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 OCT -1 AM 9:31

23043515341

OGC 8027

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 OCT -1 AM 10:06

WILEY, REIN & FIELDING

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

September 28, 1990

WRITER'S DIRECT DIAL NUMBER

(202) 828-3178

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 OCT -1 AM 11:38

Lawrence M. Noble, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Elizabeth Campbell

Re: MUR 2989

Dear Mr. Noble:

Please find enclosed a Designation of Counsel Form for Robert L. Turley. As I explained to you on phone earlier this week, Mr. Turley's original Notification of Reason to Believe letter was apparently mailed to the wrong address and he only received notice of this Matter this week when your letter of September 12, 1990, was delivered to him by certified mail. That letter, too, was incorrectly addressed.

Accordingly, we will be supplying you with his Affidavit and the supporting documents as soon as we can compile this information. For future reference, the address listed on Mr. Turley's Designation of Counsel form is the correct address.

Thank you for your cooperation in this matter.

Sincerely yours,

Steven M Mister

Steven M. Mister

Encl.
cc: Jan Witold Baran, Esq.
Mr. Robert L. Turley

2304335153342

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Jan W. Baran, Esq.

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

TELEPHONE: (202) 429-7000

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.

9-27-90
Date

Robert L. Turley
Signature

RESPONDENT'S NAME: Robert L. Turley

ADDRESS: P.O. Box 786
Marco Island, FL 33969

Atlanta Office: (404) 497-1964

HOME PHONE:

BUSINESS PHONE: Florida Office: (813) 642-9333

9304351533 43

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 1, 1990

John S. Logan, Esq.
Dow, Lohnes, Albertson
1255 23rd St., N.W., Suite 500
Washington, D.C. 20037

RE: MUR 2989
Rankin M. Smith

Dear Mr. Logan:

This is in response to your letter dated September 27, 1990, which we received on September 27, 1990, requesting an extension of 24 days to respond to the Commission's finding that there is reason to believe Rankin M. Smith violated 2 U.S.C. § 441a(a)(1)(A). After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on October 22, 1990.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

9304351533 4 4

OGC 8029

LAW OFFICES
PICKETT, PICKETT & PICKETT
A PROFESSIONAL CORPORATION
225 NORTH MAIN STREET
JASPER, GEORGIA 30143
(404) 692-2494

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 OCT -1 AM 10:02

MUR 2989

WILL HAYS PICKETT
WILL HAYS PICKETT, JR.

ROSCOE PICKETT
(1883-1954)

September 25, 1990

Mr. Jeffery Long
Federal Election Commission
9999 East Street, N.W.
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT -1 AM 11:38

RE: Pickett, Pickett &
Pickett, P.C.

Dear Mr. Long:

Pursuant to our telephone conversation, I am confirming that I have receive a certified letter dated September 12, 1990 with enclosures as to an alleged violation of the Federal Election Campaign Act as amended.

Pickett, Pickett & Pickett, P.C. is in fact a Georgia corporation and did in fact send a check in the amount of $1,000.00 to the Friends of Mattingly. This check was sent pursuant to a solicitation apparently through the mail. We were not aware that any contribution in this regard was unauthorized and certainly not willful. This contribution was sent primarily from a mail solicitation.

This was done unknowingly and not willfully in violation of any law. I hope that our frankness will be considered and hope that it will end this very uncomfortable position.

Should you have any other questions, please contact me.

Sincerely yours,

Will Hays Pickett, Jr.

WHPJR/vlj

2304351534 5

9 3 0 4 3 5 1 5 3 4 6

PICKE.. PICKETT & PICKETT ATTORNEYS
A PROFESSIONAL CORPORATION
PHONE 404 692-2494
EDGE BLDG. 225 N. MAIN ST.
JASPER, GA 30143

1362

PAID 10-22 19 86 64-271 / 611

PAY TO THE ORDER OF Friends of Matting | 27 OCT 27 '86 X-- | $ 1000.00

ONE Thousand & 00/100 DOLLARS

PICKENS COUNTY BANK
64-271 JASPER 64-271
611 GA 611

PCB PICKENS COUNTY BANK
Jasper, Georgia 30143

FOR

Via Certified Mail

September 28, 1990

Mr. Jeffrey Long
Federal Election Commission
Washington, DC 20463

Re: MUR 2989

Dear Sir:

As we discussed last week I have enclosed the following for your review:

(1) Copies of checks written by Mr. Shircliff to the Mattingly campaign.

(2) Certification from the First Union National Bank that the account on which these checks were written is, in fact, a personal account.

Please contact me if you need any additional information.

Sincerely,

William O. Inman III

William O. Inman III
President

90 OCT -3 PM 3:23
RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 OCT -3 AM 11:18
RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

9304351553347

First Union National Bank of Florida
P.O. Box 2080
Jacksonville, Florida 32231-0010
904 361-3925

Private Banking

September 27, 1990

Mr. Robert T. Shircliff
Robert T. Shircliff & Associates, Inc.
1301 Gulf Life Drive
Jacksonville, FL 32201

Dear Mr. Shircliff:

The purpose of this letter is to inform you that depository account exists as a personal checking account.

If you require any additional information or if I may be of any further assistance, please feel free to contact me at 361-3001.

Sincerely,

Anne M. Alexander
Vice President
Private Banking

AMA/mo

STATE OF FLORIDA
COUNTY OF DUVAL

The foregoing instrument was acknowledged before me this 27th day of September, 1990, by Anne Alexander, the Vice President, of First Union National Bank of Florida, a national banking association, on behalf of the association.

Molly Anne O'Donnell
Notary Public, State of Florida

My commission expires: Notary Public, State of Florida My Commission Expires March 6, 1992 Bonded Thru Troy Fain - Insurance Inc.

9304351153148

ROBERT T. SHIRCLIFF
AND ASSOCIATES
2529 GULF LIFE TOWER
JACKSONVILLE, FLORIDA 32207
TELEPHONE 904/396-7716

DATE	INVOICE	AMOUNT
2/12	Contributions	

630

1621

P 1 T6659 42384578

PAY _____ DOLLARS

DATE	TO THE ORDER OF	CHECK NO	DESCRIPTION		CHECK AMOUNT
			GROSS	DISCOUNT	
2-12-85	Friends of Mattingly	1621			*500 00

ROBERT T. SHIRCLIFF - GENERAL ACCOUNT

ATLANTIC NATIONAL BANK OF FLORIDA
JACKSONVILLE, FLORIDA

Robert T. Shircliff

ROBERT T. SHIRCLIFF
AND ASSOCIATES
2529 GULF LIFE TOWER
JACKSONVILLE, FLORIDA 32207
TELEPHONE 904/396-7716

DATE	INVOICE	AMOUNT
	Contribution	

63-2
630

2032

P 1 T6038 45025519

PAY $250 & 00 CTS. DOLLARS

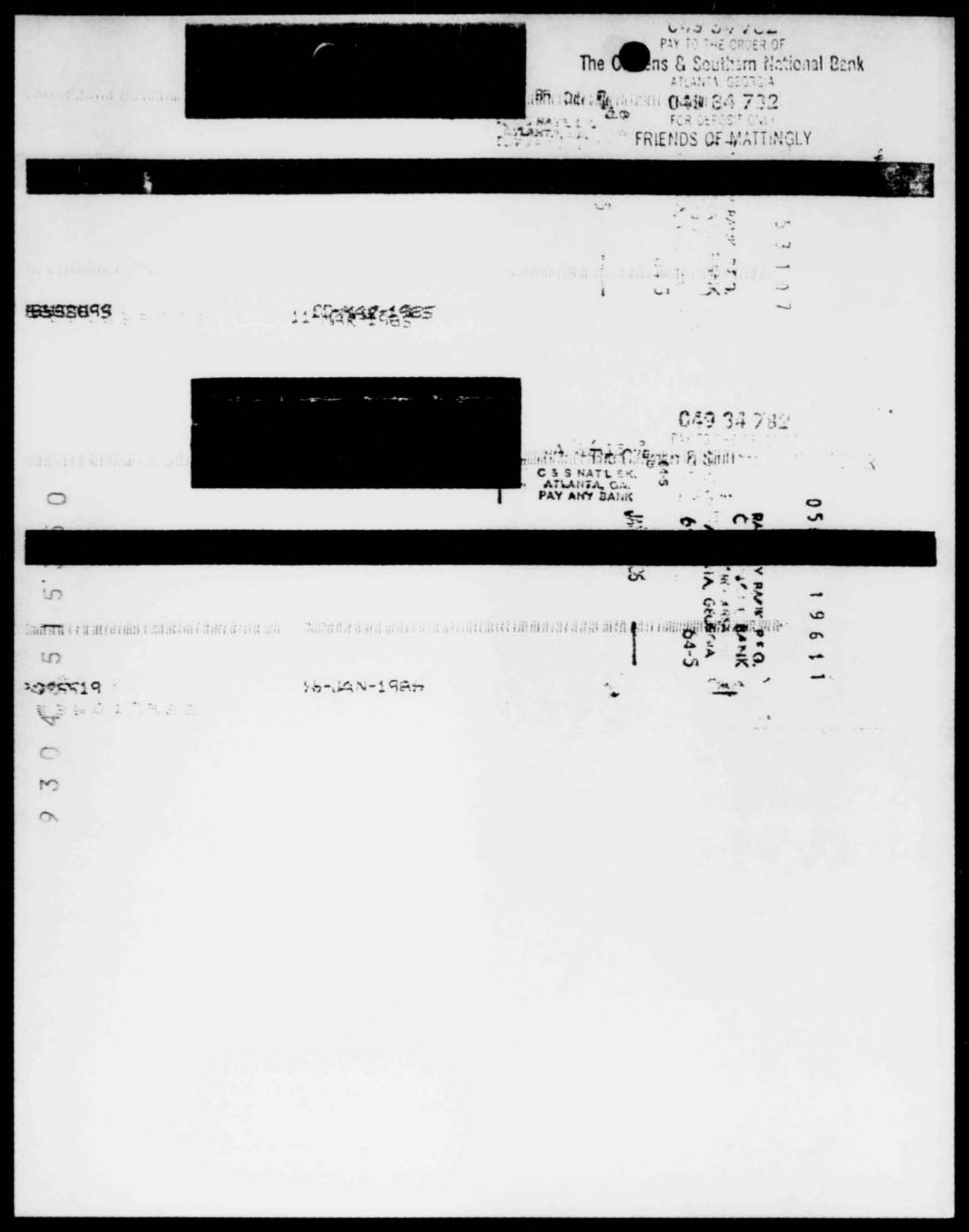
DATE	TO THE ORDER OF	CHECK NO	DESCRIPTION		CHECK AMOUNT
			GROSS	DISCOUNT	
1-7-86	Mack Mattingly Senate Club	2032			*250 00

ROBERT T. SHIRCLIFF - GENERAL ACCOUNT

ATLANTIC NATIONAL BANK OF FLORIDA
JACKSONVILLE, FLORIDA

Robert T. Shircliff

930435 5


PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GEORGIA
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY
C & S NATL BK.
ATLANTA, GA.
PAY ANY BANK
16-JAN-1984

HAND DELIVERED
06C8118
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

BEFORE THE FEDERAL ELECTIONS COMMISSION

90 OCT -9 AM 10:41

ANSWER

MUR 2989
Respondent: John M. Stuckey, Jr.

COMES NOW, Respondent, John M. Stuckey, Jr., and answers charges as set out in Federal Election Commission ("FEC") letter notice dated July 20, 1990 (the "Complaint") alleging violations of 2 U.S.C. §441a(a)(1)(A), provision of the Federal Election Campaign Act of 1971 as amended ("the Act") all as set out in the FEC's Factual and Legal Analysis attached hereto marked Exhibit "A" and incorporated herein by reference ("Respondent's Affidavit").

90 OCT 9 PM 4:04
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

1.

Respondent answers the factual allegations of the Complaint as set out in the Affidavit attached hereto marked Exhibit "B" and incorporated herein by this reference.

2.

Respondent moves the FEC to dismiss these proceedings as the facts set out in Respondent's Affidavit establish that Respondent's actions do not constitute a violation of the Act.

RESPONDENT:

John M. Stuckey, Jr.

(0356e)

9304351535 1

EXHIBIT "A"

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

MUR 2989

RESPONDENT: John M. Stuckey, Jr.

The Federal Election Campaign Act of 1971, as amended, prohibits a person from making contributions to a candidate for federal office or his authorized political committees aggregating in excess of $1,000 in any election. 2 U.S.C. § 441a(a)(1)(A).

A review of the reports filed by the Friends of Mattingly reveals that John M. Stuckey, Jr. made excessive contributions to Mack Mattingly, a candidate for the U.S. Senate, totaling $1,500 for the 1986 Republican U.S. Senate Primary election in Georgia. Information on these contributions is presented below:

Primary Date	Total Contributed for the Primary	Total Excessives in the Primary
8/12/86	$500 - 11/26/84 $1,000 - 5/20/85	$1,500

Because these contributions were for the Primary election, they exceed the contribution limitations of the Act by $1,500. Therefore, there is reason to believe that John M. Stuckey, Jr. violated 2 U.S.C. § 441a(a)(1)(A).

9304351535 2

EXHIBIT "B"

BEFORE THE FEDERAL ELECTIONS COMMISSION

MUR 2989

AFFIDAVIT OF JOHN M. STUCKEY, JR.

I, JOHN M. STUCKEY, JR., being duly sworn, do hereby depose and state as follows:

1. That, on November 26, 1984, I made a contribution to "Friends of Mattingly" in the amount of $500.00. A copy of my check number 1046 drawn on the Bank of Coweta, Newnan, Georgia is attached hereto marked Schedule 1 and incorporated herein by this reference. The notation on the face of the subject check indicates my intention to make a "contribution" to the reelection campaign of Senator Mattingly through the "Friends of Mattingly", which organization I assumed was an authorized political committee raising funds on behalf of Senator Mattingly.

2. That, on May 20, 1985, in response to a telephone solicitation by the Republican Party of Georgia, I purchased tickets for my wife and myself to an event styled "Georgia Tribute to the President". A copy of my check number 1386 drawn on the Bank of Coweta, Newnan, Georgia is attached hereto marked Schedule 2 and incorporated herein by this reference. The notation on the face of the subject check indicates that it was issued for the purchase of tickets to a "Georgia Tribute To The President" and not as a campaign contribution.

3. That, as far as I am able to determine, no copies of any written invitation or other records relating to the May, 1985 "Georgia Tribute To The President" are extant. I have made request of the Republican Party of Georgia to produce such records and have been told that they have been lost or destroyed.

4. That, I did not intend or consent that the May 20, 1985 payment of $1,000.00 for tickets to the "Georgia Salute to the President" be a contribution to Senator Mattingly or any other candidate for federal office or to any political committee of any candidate for federal office. To the contrary, I intended the purchase of tickets to the subject event (1 each for my wife and myself) to be in support of the Republican Party of

2304351553

Georgia which at that time was properly engaged in the purpose of fundraising for contributions other than to federal candidates or to their authorized Campaign Committees; and as confirmation of such intention, state that I mailed the subject check to the Republican Party of Georgia's offices only after receiving assurances that my purchase of the subject tickets would be credited as a contribution to the State Party's Georgia Republican Foundation.

John M. Stuckey, Jr.

Sworn to and subscribed before me this 8 day of October, 1990 in the presence of:

Witness

Notary Public

Date Notarized: 10/8/90

My Commission expires:

Notary Public, Fayette County, Georgia
My Commission Expires July 24, 1993

[NOTARIAL SEAL]

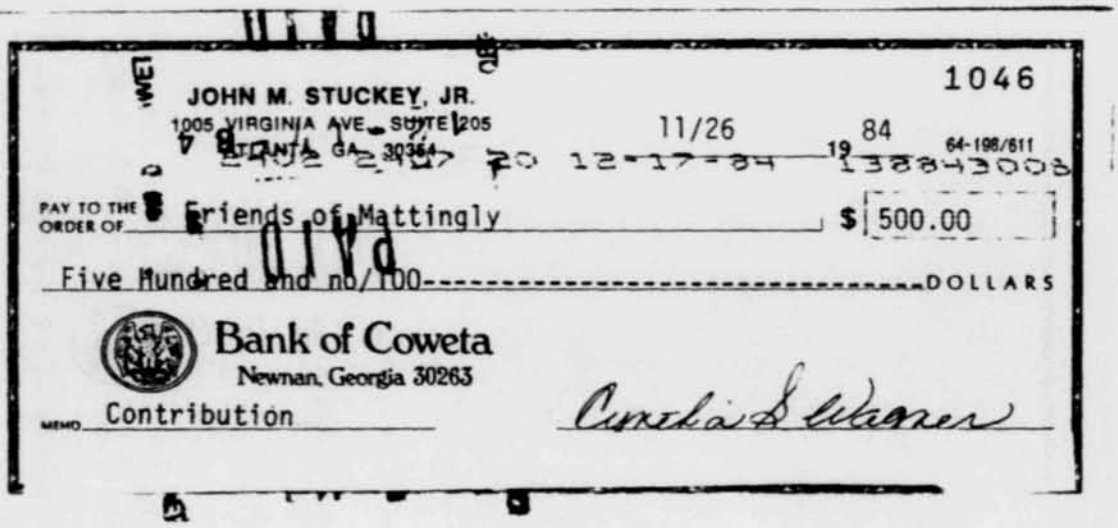
(0356e)

P 930435153554

SCHEDULE 1

TO

AFFIDAVIT OF JOHN M. STUCKEY, JR.



JOHN M. STUCKEY, JR.
1005 VIRGINIA AVE. SUITE 205
ATLANTA, GA. 30354

1046

11/26 19 84

64-198/611

PAY TO THE ORDER OF Friends of Mattingly $ 500.00

Five Hundred and no/100---------- DOLLARS

Bank of Coweta
Newnan, Georgia 30263

MEMO Contribution

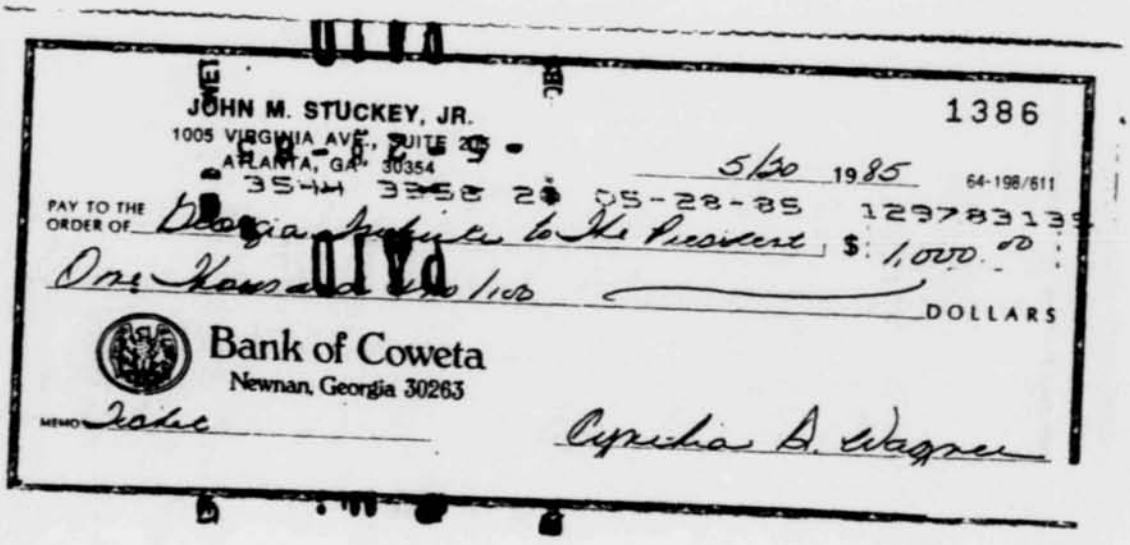
Cornelia S Stuckey

930435155555

SCHEDULE 2

TO

AFFIDAVIT OF JOHN M. STUCKEY, JR.



JOHN M. STUCKEY, JR.
1005 VIRGINIA AVE., SUITE 2[illegible]
ATLANTA, GA. 30354

1386

5/20 1985

64-198/611

PAY TO THE ORDER OF Georgia Institute to the Presidnt $ 1,000.00

One Thousand and no/100 DOLLARS

Bank of Coweta
Newnan, Georgia 30263

MEMO Dues

Cynthia A. Wagner

930435155356

CHARLES B. WEST

90 OCT -9 AM 11:20

September 20, 1990

MUR 2989

90 OCT -9 PM 4:03

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Federal Election Commission
999 East Street, N.W.
Washington, D.C. 20463

Attention: Office of General Counsel
Mr. Jeffrey Long

Dear Mr. Long:

I appreciate your assistance in the conversation we had today. My secretary is on vacation this week, and I am going to be out of town on business when she returns, so I am asking her to please sign this letter and forward it to you without delay.

In our conversation on the telephone, I made known to you that the date of the letter to me was August 9th but that I had only received this material as of last week and could not possibly correspond within the 15 days of August 9th as noted in the letter. You said you were making note of this fact.

The information that I have does not correspond with the information turned over to you from the Mattingly campaign. I am attaching xerox copies of two checks which represent a $1,000 donation each for the primary and general election by myself and my wife. As I related to you over the telephone, I cannot relate the dates of these checks to the primary and general elections because I do not have access to those dates at this time. However, the intention was at the time for Mrs. West and me to make donations as I have herewith described.

If there is any further information that you wish, please contact me and I will try to explain it.

Sincerely,

Charles B. West (bjp)

Charles B. West

CBW:bjp
(Dictated but not read)
Attachments

9304351553357

CHARLES B. WEST 07 12-62
PH. 876-8989

~~1167~~

7/23 19 86 64-7/610

PAY TO THE ORDER OF MACK MATTINGLY FOR SENATE $ 2,000 00

Two Thousand & no/100 DOLLARS

MEMBER OF SENATORIAL BankSouth Atlanta, Georgia

Chas. B. West

Mrs. Charles B. West
CHARLES B. WEST 07 12-62
PH. 876-8989

MEMBER OF SENATORIAL TRUST

1164

7/24 19 86 64-7/610

PAY TO THE ORDER OF Mack Mattingly Senate Trust $ 2000 00

Two Thousand & no/100 DOLLARS

BankSouth Atlanta, Georgia

MEMO Less Mrs Chas Bond

Chas B West

230433515358

AG '86 20

C & S NAT'L BK.
ATLANTA, GA.
PAY ANY BANK

079 35 109
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GA.

AG '86 21 079 35 109
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY
GENERAL ACCOUNT

AG '86 21

PROCESSED
ATLANTA, GEORGIA

079 35 109
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GA.

SE '86 25 079 35 109
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY
GENERAL ACCOUNT

SE '86 25

PROCESSED
ATLANTA, GEORGIA

9304351535 59

OGC 8123

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 9, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 10 AM 9:25

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989

Dear Mr. Noble:

Please find enclosed the Affidavits of Marion R. Buisson and her husband, Robert T. Buisson, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mrs. Buisson in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Marion Buisson made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mrs. Buisson totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission were from Marion and Robert Buisson's joint checking account and represent contributions by both Mr. & Mrs. Buisson, to be allocated between the Mattingly campaign's primary and general election accounts. Therefore, the Buisson's contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a).

Moreover, the allocation letter signed by Robert T. Buisson (and attached to his Affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. The Buissons received representations that the Mattingly campaign did indeed have a primary debt. The burden of proper

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reporting, redesignation and refund of the contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Buissons. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from Marion R. Buisson (frame 2739) and Robert T. Buisson (frame 2740) to the Mattingly campaign's general election account (copies of relevant frames of the FEC 1986 "G Index" attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 4 and 24 attached hereto). These entries in the FEC's records further document Marion and Robert Buisson's intention at the time of the contribution, as stated in their Affidavits, and evidences the Mattingly campaign's receipt of that request for proper allocation.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Marion R. Buisson violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mrs. Marion R. Buisson

2304351536 1

BEFORE THE FEDERAL ELECTION COMMISSION

County of GWINNETT)
) MUR 2989
State of GEORGIA)

AFFIDAVIT OF ROBERT T. BUISSON

Robert T. Buisson, first being duly sworn, deposes and says:

1. I am Robert T. Buisson. On October 9, 1986, my wife, Marion R. Buisson, signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 respectively, drawn on a joint account of my wife and myself.

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for United States Senate, it was my intent that the amount be given jointly with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife (copies of checks attached hereto).

3. On the following day, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My wife and I understood that there was a campaign debt from the primary election and that we could

2304351-53562

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contribution was made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife and me between the campaign's primary and general election accounts.

Robert T. Buisson

Robert T. Buisson

State of Georgia)
County of Gwinnett) ss.

Subscribed to and sworn before me this 26 day of September, 1990.

Notary Public

My Commission Expires: Notary Public, Gwinnett County, Georgia My Commission Expires [illegible]

9304351 5363

BEFORE THE FEDERAL ELECTION COMMISSION

County of Gwinnett)
) MUR 2989
State of Georgia)

AFFIDAVIT OF MARION R. BUISSON

Marion R. Buisson, first being duly sworn, deposes and says:

1. I am Marion R. Buisson. On October 9, 1986, I signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 respectively, drawn on a joint account of my husband, Robert T. Buisson, and myself (copies of checks attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. On the following day, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My husband and I understood that there was a campaign debt from the primary election and that we could

9304351536 4

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contribution was made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my husband and me between the campaign's primary and general election accounts.

Marion R. Buisson

Marion R. Buisson

State of Georgia)
County of Gwinnett) ss.

Subscribed to and sworn before me this 26 day of September, 1990.

Notary Public

Notary Public, Gwinnett County, Georgia
My Commission Expires Sept. 16, 1992

My Commission Expires: _____

93043515365

October 10, 1986

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary election debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

We have made this contribution by the payment of two checks, one for $2,000 ($1,000.00 each), for our general election contribution, and one for $500 ($250.00 each), toward the retirement of the primary election debt.

Please advise me if my understanding is contrary to the facts.

Singerely,

Robert T. Buisson

Robert T. Buisson

93043515366

ROBERT T. BUISSON
MARION R. BUISSON
2622 CLUB DR.
SNELLVILLE, GA 30278

CMA Cash Management Account®

611

10-9 19 86

Pay to the order of Friends of Mattingly $2000.00

Two thousand and no/100 Dollars

Merrill Lynch

BANK ONE, COLUMBUS, N.A. Columbus, Ohio 43271

Memo 1,000 ea. dec. 1000 ~~#887~~

Marion R. Buisson

ROBERT T. BUISSON
MARION R. BUISSON
2622 CLUB DR.
SNELLVILLE, GA 30278

CMA Cash Management Account®

612

10-9 19 86

Pay to the order of Friends of Mattingly $500.00

five hundred and no/100 Dollars

Merrill Lynch

BANK ONE, COLUMBUS, N.A. Columbus, Ohio 43271

Memo

Marion R. Buisson

Robert Mann

Need 10/14/86

930435153367

OGC 8124

WILEY, REIN & FIELDING

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

October 9, 1990

WRITER'S DIRECT DIAL NUMBER

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 10 AM 9:25

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989

Dear Mr. Noble:

Please find enclosed the Affidavits of Jacob S. Jernigan and his wife, Gail Jernigan, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Jernigan in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Jacob Jernigan made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mr. Jernigan totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission were from Jacob and Gail Jernigan's joint checking account and represent contributions by both Mr. & Mrs. Jernigan, to be allocated between the Mattingly campaign's primary and general election accounts. Therefore, the Jernigan's contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a).

Moreover, the allocation letter signed by Jacob Jernigan (and attached to his Affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. The Jernigans received representations that the Mattingly campaign did indeed have a primary debt. The burden of proper reporting, redesignation

2304351536 8

and refund of the contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Jernigans. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from Jacob Jernigan and Gail Jernigan (frame 184) to the Mattingly campaign's general election account (copy of relevant frame of the FEC 1986 "G Index" is attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 11, 88 and 89 attached hereto). These entries in the FEC's records further document Gail and Jacob Jernigan's intention at the time of the contribution, as stated in their Affidavits and evidences the Mattingly campaign's receipt of their request for proper allocation.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Jacob Jernigan violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. Jacob S. Jernigan

2304351536 9

BEFORE THE FEDERAL ELECTION COMMISSION

County of Sedgwick)
) MUR 2989
State of Kansas)

AFFIDAVIT OF JACOB S. JERNIGAN

Jacob S. Jernigan, first being duly sworn, deposes and says:

1. I am Jacob S. Jernigan. On September 26, 1986, I signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my wife, Gail Jernigan, and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My wife and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and

9304351537/0

the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contribution was made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife and me between the campaign's primary and general election accounts.

Jacob S. Jernigan

State of Kansas)
County of Sedgwick) ss.

Subscribed to and sworn before me this 28th day of September, 1990.

JAMES E. KIRKPATRICK
NOTARY PUBLIC
STATE OF KANSAS
My Appt. Exp. 12-18-93

Notary Public

My Commission Expires: 12-18-93

9304351537 1

BEFORE THE FEDERAL ELECTION COMMISSION

County of Sedgwick)
) MUR 2989
State of Kansas)

AFFIDAVIT OF GAIL JERNIGAN

Gail Jernigan, first being duly sworn, deposes and says:

1. I am Gail Jernigan. On September 26, 1986, my husband, Jacob S. Jernigan, signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my husband and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My husband and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and

9304351537 2

the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contribution was made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my husband and me between the campaign's primary and general election accounts.

Gail Jernigan

Gail Jernigan

State of Kansas)
County of Sedgwick) ss.

Subscribed to and sworn before me this 28th day of September, 1990.

JAMES E. KIRKPATRICK
NOTARY PUBLIC
STATE OF KANSAS
My Appt. Exp. 12-18-93

James E. Kirkpatrick
Notary Public

My Commission Expires: 12-18-93

93043515373

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: 10-7-86

Jacob S. Jernigan

Jacob S. Jernigan
Robert Mason

Rec'd 10/12/86

9304351537 4

Jacob S. or Gail Jernigan
6439 Rico
Wichita, Ks 67204

5106

9-26-86

40-292/1011

Pay to the Order of Friends of Mattingly $2500 00

Two Thousand Five Hundred and 00/100 DOLLARS

Chisholm Trail State Bank
WICHITA, KANSAS

Memo

Jacob S. Jernigan

OGC 8125

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 9, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 10 AM 9:26

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989

Dear Mr. Noble:

Please find enclosed the Affidavits of John Roig and his wife, Gloria E. Roig, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Roig in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that John Roig made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,650 and alleges excess contributions by Mr. Roig totaling $1,650. As the attached Affidavits clearly state, the $2,500 contribution noted by the Commission was from John and Gloria Roig's joint checking account and represented contributions by both Mr. & Mrs. Roig, to be allocated between the Mattingly campaign's primary and general election accounts.

Moreover, the allocation letter signed by John Roig (and attached to his Affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. The Roigs received representations that the Mattingly campaign did indeed have a primary debt. Mr. Roig's separate check for $150 was not specifically designated toward the Mattingly campaign's primary account but Mr. Roig had every reason to expect his contribution would be properly allocated within the limits of the law or returned to him. The burden of proper reporting,

9304351537 5

redesignation or refund of the contribution, if required, fell squarely on the Mattingly campaign.

The Commission's public records reflect the allocation intended by the Roigs concerning the $2,500 contribution. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from John Roig and Gloria Roig (frame 7178) to the Mattingly campaign's general election account (copies of relevant frames of the FEC 1986 "G Index" attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 15, 145 and 146 attached hereto). These entries in the FEC's records further evidence John and Gloria Roig's intention at the time of the contribution as stated in their Affidavits. Apparently without examination of its own records of contribution receipts, the Mattingly campaign inadvertently designated the $150 amount to the general account as well, instead of properly allocating it toward the primary debt or returning the contribution to Mr. Roig. As Mr. Roig had only contributed $250 to the primary account, had the proper allocation been made to that account, his $150 contribution would not have exceeded the permissible limit of 2 U.S.C. § 441a(a).

Accordingly, I urge the General Counsel to recommend no probable cause to believe that John Roig violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. John Roig

2304351537 6

BEFORE THE FEDERAL ELECTION COMMISSION

County of Broward)
) MUR 2989
State of Florida)

AFFIDAVIT OF JOHN M. ROIG

John M. Roig, first being duly sworn, deposes and says:

1. I am John M. Roig. On September 15, 1986, I signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my wife, Gloria E. Roig, and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My wife and I understood that there was a campaign debt from the primary election and that we could

9304351537 7

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contributions were made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife and me between the campaign's primary and general election accounts.

6. On September 23, 1986, I wrote a separate check payable to Friends of Mattingly for $150 (copy of check attached hereto). Although I did not expressly designate that amount between the primary and general election campaigns, I assumed the Mattingly committee would properly

9304351537 8

allocate the amount to keep my contributions within the permissible limits of the law or return the check to me.

John M. Roig

John M. Roig

State of Florida)
County of Broward) ss.

Subscribed to and sworn before me this 24th day of September, 1990.

Melanie Smith

Notary Public

Notary Public, State of Florida
My Commission Expires March 7, 1994
Bonded thru Maynard Bonding Agency

My Commission Expires:

9304351537/9

BEFORE THE FEDERAL ELECTION COMMISSION

County of Broward)
) MUR 2989
State of Florida)

AFFIDAVIT OF GLORIA E. ROIG

Gloria E. Roig, first being duly sworn, deposes and says:

1. I am Gloria E. Roig. On September 15, 1986, my husband, John M. Roig, signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my husband and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My husband and I understood that there was a campaign debt from the primary election and that we could

2304351538O

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contributions were made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my husband and me between the campaign's primary and general election accounts.

Gloria E. Roig

Gloria E. Roig

9304351-5381

State of Florida)
County of Broward) ss.

Subscribed to and sworn before me this 24th day of September, 1990.

Melanie Smith

Notary Public

Notary Public, State of Florida
My Commission Expires March 7, 1994
Bonded thru Maynard Bonding Agency

My Commission Expires:

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: 10/1/96

Robert Mason

Recd 10/12/96

930435153882

JOHN M. ROIG OR GLORIA E. ROIG
D/B/A A. L. WILLIAMS
9600 W. SAMPLE ROAD, SUITE 201
CORAL SPRINGS, FL 33065

63-
21

3586

PAY Two Thousand five hundred & 00/100 ——→ DOLLARS

DATE	TO THE ORDER OF	CHECK NO.	DESCRIPTION	CHECK
9/15/96	Friends of Mattingly	3596	GROSS / DISCOUNT	250

GLENDALE FEDERAL SAVINGS & LOAN
MARGATE SOUTH BRANCH - 015
7151 S. STATE RD. 7, MARGATE, FL 33068

John M. Roig

CORAL SPRINGS, FL 3[illegible]

3608

Five hundred fifty dollars & 00/100 — DOLLARS

DATE	TO THE ORDER OF	CHECK NO	DESCRIPTION		CHECK AMOUNT
			GROSS	DISCOUNT	
12/3/86	Friends of Mattingly	3608			150 00

GLENDALE FEDERAL SAVINGS & LOAN
MARGATE SOUTH BRANCH - 018
7[illegible] S. STATE RD. 7, MARGATE, FL 33068

John & Gloria Roig

Friends of Mattingly
P.O. Box 1986
Atlanta, GA 30301-1986

Dear Bob:

Enclosed is a check for the amount of $150.00. Please note this check is for the daughter of N.S.D. John & Gloria Roig, Tara. Mr. & Mrs. Roig have sent their check for the amount of $2,500. Please make sure that their daughter is seated with them. Thank you.

Sincerely,

Melanie Ransom

Melanie Ransom
Office Manager

930435515383

19020

OGC 8126

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 9, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 10 AM 9:26

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989

Dear Mr. Noble:

Please find enclosed the Affidavits of Bryce Peterson and his wife, Debra V.E. Peterson, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Peterson in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Bryce Peterson made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mr. Peterson totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission were from Bryce and Debra Peterson's joint checking account and represent contributions by both Mr. & Mrs. Peterson, to be allocated between the Mattingly campaign's primary and general election accounts. Therefore, the Peterson's contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a).

Moreover, the allocation letter signed by Bryce Peterson (and attached to his Affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. The Petersons received representations that the Mattingly campaign did indeed have a primary debt. The burden of proper reporting, redesignation

2304351538 4

and refund of the contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Petersons. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from Bryce Peterson (frame 5806) and Debra V.E. Peterson (frame 5808) to the Mattingly campaign's general election account (copies of relevant frames of the FEC 1986 "G Index" attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 14 and 131 attached hereto). These entries in the FEC's own records further evidence Bryce and Debra Peterson's intention at the time of the contribution as stated in their Affidavits.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Bryce Peterson violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. Bryce Peterson

2304351538 5

BEFORE THE FEDERAL ELECTION COMMISSION

County of Salt Lake)
) MUR 2989
State of Utah)

AFFIDAVIT OF BRYCE PETERSON

Bryce Peterson, first being duly sworn, deposes and says:

1. I am Bryce Peterson. On October 1, 1986, I signed two checks payable to Friends of Mattingly for the amount of $2,000 and $500 respectively, drawn on a joint account of my wife, Debra V.E. Peterson, and myself (copies of checks attached hereto).

2. Contemporaneously with the giving of those contributions to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contributions from our joint checking account equally between the two of us.

2304351538 6

4. My wife and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. To evidence our intent, the memo entries on these checks clearly indicate that the $2,000 amount should be allocated to the general election campaign and that the $500 check was intended to be allocated toward the debt of the primary election campaign.

6. As further evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contributions were made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife

9304351538 7

and me between the campaign's primary and general election accounts.

Bryce Peterson

State of Utah)
County of Salt Lake) ss.

Subscribed to and sworn before me this 24 day of September, 1990.

Dora L Hansen
Notary Public

My Commission Expires: MY COMM. EXP. 6/19/91

2304351 5388

BEFORE THE FEDERAL ELECTION COMMISSION

County of Salt Lake)
) MUR 2989
State of Utah)

AFFIDAVIT OF DEBRA V.E. PETERSON

Debra V.E. Peterson, first being duly sworn, deposes and says:

1. I am Debra V.E. Peterson. On October 1, 1986, my husband signed two checks payable to Friends of Mattingly for the amount of $2,000 and $500 respectively, drawn on a joint account of my husband and myself (copies of checks attached hereto).

2. Contemporaneously with the giving of those contributions to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contributions from our joint checking account equally between the two of us.

9304351538 9

4. My husband and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. To evidence our intent, the memo entries on these checks clearly indicate that the $2,000 amount should be allocated to the general election campaign and that the $500 check was intended to be allocated toward the debt of the primary election campaign.

6. As further evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contributions were made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions

93043515390

from my husband and me between the campaign's primary and general election accounts.

Debra V.E. Peterson

State of Utah)
County of Salt Lake) ss.

Subscribed to and sworn before me this 24 day of September, 1990.

Doris L Hansen
Notary Public

My Commission Expires: MY COMM. EXP. 6/19/91

93043515391

Mr. Robert Mason
Finance Director
Friends of Mattingly
P O Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: 10-9-86

Bryce Peterson

Bryce Peterson

recd 10-12-86

Robert Mason

9304351539 2

BRYCE PETERSON 1081 V
DEBRA V. E. PETERSON
2324 WILLIAMSBURG CIRCLE
WEST JORDAN, UT 84084

801

10-1 19 86 97-154/1240

Pay to the order of Friends of Mattingly $ 2,000.00

two Thousand dollars & no cents Dollars

WEST JORDAN OFFICE
VALLEY BANK & TRUST COMPANY
9035 SOUTH REDWOOD ROAD, WEST JORDAN, UTAH 84084

For General election

Bryce Pet

BRYCE PETERSON 1081 V
DEBRA V. E. PETERSON
2324 WILLIAMSBURG CIRCLE
WEST JORDAN, UT 84084

802

10-1 19 86 97-154/1240

Pay to the order of Friends of Mattingly $ 500.00

five hundred dollars & no cents Dollars

WEST JORDAN OFFICE
VALLEY BANK & TRUST COMPANY
9035 SOUTH REDWOOD ROAD, WEST JORDAN, UTAH 84084

For To retire the debt incurred in the ~~primary~~ election campaign.

Bryce Pet

OGC 8127

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 9, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 10 AM 9:26

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989

Dear Mr. Noble:

Please find enclosed the Affidavits of Frank T. Dineen and his wife, Deborah Dineen, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Dineen in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Frank Dineen made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,800 and alleges excess contributions by Mr. Dineen totaling $1,800. As the attached Affidavits clearly state, the $2,500 contribution noted by the Commission represented contributions by both Mr. & Mrs. Dineen and were allocated between the Mattingly campaign's primary and general election accounts.

Moreover, the allocation letter signed by Frank Dineen (and attached to his Affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. The Dineens received representations that the Mattingly campaign did indeed have a primary debt. Mr. Dineen's separate check for $300 was not specifically designated toward the Mattingly campaign's primary account, but Mr. Dineen believed his contribution would be allocated within the limits of the law or returned to him. The burden of proper reporting, redesignation or

2304351539 3

refund of the contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Dineen's. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 from Mrs. Frank Dineen to the Mattingly campaign's general election account and contributions of $700 and $550 from Mr. Dineen to the Mattingly general and primary accounts, respectively (frame 5196 -- a copy of relevant frame of the FEC 1986 "G Index" attached hereto). These contributions along with the smaller $250 amount from Mrs. Dineen to help retire the Mattingly campaign's primary debt and the additional $300 contribution by Mr. Dineen are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 6, 44 and 45 attached hereto). These entries in the FEC's records further evidence Deborah and Frank Dineen's intention at the time of the contribution as stated in their Affidavits. The campaign appears to have processed the $300 check first which affected the campaign's allocation entries for the subsequent check, but the result is the same. Deborah Dineen's contributions total $1,000 to the general account and $250 to the primary debt; Mr. Dineen's contributions total $1,000 to the general account and $550 to the primary debt. Therefore, the Dineen's contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a).

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Frank T. Dineen violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. Frank T. Dineen

2304351539 4

BEFORE THE FEDERAL ELECTION COMMISSION

County of Dougherty)
) MUR 2989
State of Georgia)

AFFIDAVIT OF FRANK T. DINEEN

Frank T. Dineen, first being duly sworn, deposes and says:

1. I am Frank T. Dineen. On September 19, 1986, I signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on my personal account (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my wife, Deborah Dineen, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contributions equally between the two of us.

4. My wife and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and

2304351539 5

the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contributions were made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife and me between the campaign's primary and general election accounts.

6. On September 19, 1986, I also wrote a separate check payable to Friends of Mattingly for $300 (copy of check attached hereto). Although I did not expressly designate that amount between the primary and general election campaigns, I assumed the Mattingly committee would properly

9304351539 6

allocate that amount to keep my contributions within the permissible limits of the law or return the check to me.

Frank T. Dineen

Frank T. Dineen

State of Georgia)
County of Dougherty) ss.

Subscribed to and sworn before me this 24th day of September, 1990.

Carol P. Bearden
Notary Public

My Commission Expires: 7/28/91

9304351153997

BEFORE THE FEDERAL ELECTION COMMISSION

County of Dougherty)
) MUR 2989
State of Georgia)

AFFIDAVIT OF DEBORAH DINEEN

Deborah Dineen, first being duly sworn, deposes and says:

1. I am Deborah Dineen. On September 19, 1986, my husband, Frank T. Dineen, signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on his personal account (copy of check attached hereto).

2. I was aware of that contribution and, contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution equally between the two of us.

4. My husband and I understood that there was a campaign debt from the primary election and that we could allocate our contribution between the general campaign and

2304351539 8

the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contributions were made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my husband and me between the campaign's primary and general election accounts.

Deborah Dineen

Deborah Dineen

State of Georgia)
County of Dougherty) ss.

Subscribed to and sworn before me this 24th day of September, 1990.

Carol P. Bearden

Notary Public

Notary Public, Worth County, Georgia
My Commission Expires July 28, 1991

My Commission Expires: 7/28/91

93043515399

FRANK T DINEEN
3206 TROWBRIDGE RD
ALBANY, GA 31707
590

339

9/19/86 — 3-5 / 310

PAY TO THE ORDER OF Friends of Mattingly — $ 300.00

Three Hundred & — DOLLARS

Robinson Humphrey/American Express
FINANCIAL MANAGEMENT ACCOUNT
PROVIDENT NATIONAL BANK
17TH & CHESTNUT STREETS, PHILA., PA

T D ☐ FOR (2) 150 Tickets

Frank T. Dineen

Dear Sir,

This is a request for two seats ($150) at the Reagan Rally, Oct 8th 1986 @ the Dr. I understand I will have to pick up the tickets at the box office.

Sincerly,

Frank T. Dineen

Frank + Deborah DINEEN — -Names
A.L. Williams — -occupation
3206 Trowbridge Rd — -address (home)
Albany GA. 31707
912 883 5868 — -phone (home)

9304335+54000

1206 Whispering Pines Road, Albany, Georgia 31707 (912) [redacted]
Representing: Massachusetts Indemnity & Life Insurance Company / Regional Office
Registered Representative: First American National Securities, Incorpor

19000

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: 10/1/86

Frank T. Dineen

FRANK T. DINEEN

Robert Mason

ucd 10/14/86

9304351540 1

FRANK T DINEEN
3206 TROWBRIDGE RD
ALBANY, GA 31707
590

353

9/19 1986

3-5
310

PAY TO THE ORDER OF Friends of Mattingly $ 2500.00

Twenty Five Hundred xx DOLLARS

Robinson Humphrey/American Express
FINANCIAL MANAGEMENT ACCOUNT
PROVIDENT NATIONAL BANK
17TH & CHESTNUT STREETS, PHILA., PA

TO FOR

Frank T. Dineen

OGC 8128

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 9, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 10 AM 9:26

9304351540 2

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989

Dear Mr. Noble:

Please find enclosed the Affidavits of Harlen Zeitler and his wife, Mabel Zeitler, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Zeitler in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Harlen Zeitler made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mr. Zeitler totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission were from Harlen and Mabel Zeitler's joint checking account and represent contributions by both Mr. & Mrs. Zeitler, to be allocated between the Mattingly campaign's primary and general election accounts. Therefore, the Zeitler's contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a).

Moreover, the allocation letter signed by Harlen Zeitler (and attached to his affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly Committee and were within permissible limits of the law. The Zeitlers received representations that the Mattingly campaign did indeed have a primary debt. The burden of proper reporting, redesignation

and refund of the contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Zeitler's. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from Harlen Zeitler (frame 4889) and Mabel Zeitler (frame 4890) to the Mattingly campaign's general election account (copies of relevant frames of the FEC 1986 "G Index" attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 20 and 190 attached hereto). These entries in the FEC's own records further evidence Harlen and Mabel Zeitler's intention at the time of the contribution as stated in their Affidavits.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Harlen Zeitler violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. Harlen Zeitler

2304351-5403

BEFORE THE FEDERAL ELECTION COMMISSION

County of Marinette)
) MUR 2989
State of Wisconsin)

AFFIDAVIT OF MABEL ZEITLER

Mabel Zeitler, first being duly sworn, deposes and says:

1. I am Mabel Zeitler. On October 1, 1986, I signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 respectively, drawn on a joint account of my husband, Harlen Zeitler, and myself (copies of checks attached hereto).

2. Contemporaneously with the giving of those contributions to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contributions from our joint checking account equally between the two of us.

4. My husband and I understood that there was a campaign debt from the primary election and that we could

2304351540 4

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. To evidence our intent, the memo entries on these checks clearly indicate that the $2,000 amount should be allocated to the general election campaign and that the $500 check was intended to be allocated toward the retirement of the debts from the primary election campaign.

6. As further evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contributions were made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions

93043515405

from my husband and me between the campaign's primary and general election accounts.

Mabel Zeitler
Mabel Zeitler

State of Wisconsin)
County of Marinette) ss.

Subscribed to and sworn before me this 22 day of September, 1990.

Lori L Gross
Notary Public

My Commission Expires: 4-93

9304351 54006

BEFORE THE FEDERAL ELECTION COMMISSION

County of MARINETTE)
) MUR 2989
State of WISCONSIN)

AFFIDAVIT OF HARLEN ZEITLER

Harlen Zeitler, first being duly sworn, deposes and says:

1. I am Harlen Zeitler. On October 1, 1986, my wife, Mabel Zeitler, signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 respectively, drawn on a joint account of my wife and myself (copies of checks attached hereto).

2. Contemporaneously with the giving of those contributions to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contributions from our joint checking account equally between the two of us.

9304351540 7

4. My wife and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. To evidence our intent, the memo entries on these checks clearly indicate that the $2,000 amount should be allocated to the general election campaign and that the $500 check was intended to be allocated toward the retirement of the debt from the primary election campaign.

6. As further evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contribution was made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife

9304351-5408

and me between the campaign's primary and general election accounts.

Harlen Zeitler
Harlen Zeitler

State of Wisconsin)
County of Marinette) ss.

Subscribed to and sworn before me this 22 day of September, 1990.

Lou L Grose
Notary Public

My Commission Expires: 4/93

9304351540 9

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: 10-9-86

Harlen Zeitler
HARLEN ZEITLER

Recd 10-12-86 Robert Mason

HARLEN OR MABEL ZEITLER
ROUTE 3, BOX 321A
POUND, WIS. 54161

7241

10-1 19 86

Pay to the Order of Friends of Mattingly $ 500.00

Five hundred & 00/100 Dollars

COLEMAN OFFICE
THE FARMERS STATE BANK
P.O. BOX 69
COLEMAN, WIS. 54112

For Retirement Debt Exp. Mabel Zeitler

HARLEN OR MABEL ZEITLER
ROUTE 3, BOX 321A
POUND, WIS. 54161

7240

10-1 19 86

Pay to the Order of Friends of Mattingly $ 2000.00

two thousand & 00/100 Dollars

COLEMAN OFFICE
THE FARMERS STATE BANK
P.O. BOX 69
COLEMAN, WIS. 54112

For Nov 86 Gen. Elect. Campaign Mabel Zeitler

930435154 10

OGC 8129

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 9, 1990

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989

Dear Mr. Noble:

Please find enclosed the Affidavits of Jane A. Miller and her husband, Robert J. Miller, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mrs. Miller in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Jane Miller made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mrs. Miller totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission were from Jane and Robert Miller's joint checking account and represent contributions by both Mr. & Mrs. Miller, to be allocated between the Mattingly campaign's primary and general election accounts. Therefore, the Miller's contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C.§ 441a(a).

Moreover, the allocation letter signed by Robert J. Miller (and attached to his Affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. The Millers received representations that the Mattingly campaign did indeed have a primary debt. The burden of proper

2304351541

reporting, redesignation and refund of the contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Millers. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from Jane A. Miller (frame 3963) and Robert J. Miller (frame 3991) to the Mattingly campaign's general election account (copies of relevant frames of the FEC 1986 "G Index" attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 13, 114 and 115 attached hereto). These entries in the FEC's own records further evidence Jane and Robert Miller's intention at the time of the contribution as stated in their Affidavits.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Jane Miller violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mrs. Jane A. Miller

2304351541 2

BEFORE THE FEDERAL ELECTION COMMISSION

County of Gwenett)
) MUR 2989
State of Georgia)

AFFIDAVIT OF ROBERT J. MILLER

Robert J. Miller, first being duly sworn, deposes and says:

1. I am Robert J. Miller. On October 1, 1986, my wife, Jane A. Miller, signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 drawn on a joint account of my wife and myself (copies of checks attached hereto).

2. Contemporaneously with the giving of those contributions to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contributions from our joint checking account equally between the two of us.

4. My wife and I understood that there was a campaign debt from the primary election and that we could

2304351541 3

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contributions were made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife and me between the campaign's primary and general election accounts.

Robert J. Miller

Robert J. Miller

State of Georgia)
County of Gwinnett) ss.

Subscribed to and sworn before me this 24 day of September, 1990.

Notary Public

My Commission Expires: Notary Public, Gwinnett County, Georgia My Commission Expires Sept. 16, 1992

93043515414

BEFORE THE FEDERAL ELECTION COMMISSION

County of Gwenett)
) MUR 2989
State of Georgia)

AFFIDAVIT OF JANE A. MILLER

Jane A. Miller, first being duly sworn, deposes and says:

1. I am Jane A. Miller. On October 1, 1986, I signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 drawn on a joint account of my husband, Robert J. Miller, and myself (copies of checks attached hereto).

2. Contemporaneously with the giving of those contributions to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contributions from our joint checking account equally between the two of us.

4. My husband and I understood that there was a campaign debt from the primary election and that we could

2304351541 5

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contributions were made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my husband and me between the campaign's primary and general election accounts.

Jane A. Miller

Jane A. Miller

State of Georgia)
County of Gwinnett) ss.

Subscribed to and sworn before me this 24 day of September, 1990.

Linda L. Hyman

Notary Public

My Commission Expires: Notary Public, Gwinnett County, Georgia My Commission Expires Sept. 16, 1992

93043515416

October 10, 1986

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary election debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

We have made this contribution by the payment of two checks, one for $2,000 ($1,000.00 each), for our general election contribution, and one for $500 ($250.00 each), toward the retirement of the primary election debt.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Robert J. Miller

93043515417

ROBERT J. MILLER OR
JANE A. MILLER
1350 DOGWOOD RD.
SNELLVILLE, GA 30278

199

Oct 1 19 86 64-240/611

PAY TO THE ORDER OF Friends of Mattingly $ 500 =

five hundred and no/ hundredths — DOLLARS

FIDELITY NATIONAL BANK ATLANTA, GA.

FOR _____ Jane A Miller

ROBERT J. MILLER OR
JANE A. MILLER
1350 DOGWOOD RD.
SNELLVILLE, GA 30278

198

Oct 1 19 86 64-240/611

PAY TO THE ORDER OF Friends of Mattingly $ 2,000 =

two thousand and no/ hundredths — DOLLARS

FIDELITY NATIONAL BANK ATLANTA, GA.

FOR _____ Jane A Miller

MCL 10/12/06 Robert Mann

930435154 18

OGC 8130

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 9, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 10 AM 9:26

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989

Dear Mr. Noble:

Please find enclosed the Affidavits of Dennis Schechter and his wife, Patricia Schechter, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Schechter in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Dennis Schechter made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mr. Schechter totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission represented contributions by both Mr. & Mrs. Schechter and were to be allocated between the Mattingly campaign's primary and general election accounts. Although Patricia Schechter did not sign the check or an allocation letter, she authorized her share of the contribution as indicated in her Affidavit; and in any case, had signed a Power of Attorney to her husband authorizing him to make financial decisions on her behalf. Therefore, the Schechter's contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C.§ 441a(a).

Moreover, the allocation letter signed by Dennis Schechter (and attached to his Affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. The

9304351541 9

Schechters received representations that the Mattingly campaign did indeed have a primary debt. The burden of proper reporting, redesignation and refund of the contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Schechters. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from Dennis Schechter and Mrs. Dennis Schechter (frame 301) to the Mattingly campaign's general election account (copies of relevant frames of the FEC 1986 "G Index" attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 16 and 149 attached hereto). These entries in the FEC's own records further evidence Dennis and Patricia Schechter's intention at the time of the contribution as stated in their Affidavits.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Dennis Schechter violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. Dennis Schechter

9304351542O

BEFORE THE FEDERAL ELECTION COMMISSION

County of Morris)
) MUR 2989
State of New Jersey)

AFFIDAVIT OF PATRICIA SCHECHTER

Patricia Schechter, first being duly sworn, deposes and says:

1. I am Patricia Schechter. On September 16, 1986, my husband, Dennis Schechter signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on his personal account (copy of check attached hereto). I was aware of that contribution at the time.

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution equally between the two of us.

9304351542

4. My husband and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate the contribution to the primary and general campaigns at the time the contribution was made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my husband and me between the campaign's primary and general election accounts.

6. Prior to 1986, I executed a power of attorney to my husband (copy attached hereto) that I believed was

93043515422

sufficiently broad to allow him to make political contributions on my behalf.

Patricia Schechter

State of NJ)
County of Mon) ss.

Subscribed to and sworn before me this 25 day of Sept September, 1990.

Notary Public

My Commission Expires: 10/6/91

9304351542 3

BEFORE THE FEDERAL ELECTION COMMISSION

County of Morris)
) MUR 2989
State of New Jersey)

AFFIDAVIT OF DENNIS SCHECHTER

Dennis Schechter, first being duly sworn, deposes and says:

1. I am Dennis Schechter. On September 16, 1986, I signed check payable to Friends of Mattingly for the amount of $2,500 drawn on a personal account (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my wife, Patricia Schechter, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the

9304351-54424

contribution equally between the two of us.

4. My wife and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As further evidence of our intent at the time the contributions were made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife and me between the campaign's primary and general election accounts.

6. Additionally, I have a power of attorney for my wife (copy attached hereto) that I believe to be sufficiently broad to permit me to make a contribution on her

93043515425

behalf. She was completely aware of this contribution and consented at that time.

Dennis Schechter

State of MD)
County of Harris) ss.

Subscribed to and sworn before me this 25 day of Sept September, 1990.

Notary Public

My Commission Expires: 10/6/91

9304351-5426

IRREVOCABLE
POWER OF ATTORNEY

KNOW ALL MEN BY THESE PRESENTS:

THAT PATRICIA SCHECHTER
RESIDING AT #204 DEERLEA LANE, RD #2, BOONTON, NEW JERSEY 07005

DOES MAKE, CONSTITUTE AND APPOINT DENNIS SCHECHTER
RESIDING AT #204 DEERLEA LANE, RD #2, BOONTON, NEW JERSEY 07005

AS HER TRUE AND LAWFUL ATTORNEY FOR HER AND IN HER NAME, PLACE AND STEAD, FOR THE FOLLOWING USES AND PURPOSES:

THIS IS TO ACKNOWLEDGE THAT I GIVE DENNIS SCHECHTER THE POWER OF APPOINTMENT TO SIGN MY NAME ON ALL MATTERS THAT HAVE ANYTHING TO DO WITH FINANCIAL PLANNING & RESEARCH INTERNATIONAL, FINANCIAL PLANNING & RESEARCH PROPERTY CASUALTY CORP. OF AMERICA, A.L. WILLIAMS PRIMERICA, AND ALSO THIS POWER TO EXTEND TO ANY AND ALL ASSETS, PROPERTY, REAL ESTATE, MUTUAL FUNDS, STOCKS, AND COMPANIES WHICH I OWN OR CONTROL, NOW OR IN THE FUTURE, INCLUDING, BUT NOT LIMITED TO, MINUTES, BYLAWS, STOCK CERTIFICATES, ORGANIZATIONAL RESOLUTIONS, WAIVERS OF NOTICE, CONSENTS, PROXIES, OPENING OF BANK ACCOUNTS, AND THE OPENING OF STOCK BROKERAGE ACCOUNTS,

GIVING AND GRANTING UNTO SAID ATTORNEY FULL POWER AND AUTHORITY TO DO AND PERFORM ALL AND EVERY ACT AND THING WHATSOEVER REQUISITE AND NECESSARY TO BE DONE IN AND ABOUT THE PREMISES, AS FULL TO ALL INTENTS AND PURPOSES AS HE MIGHT OR COULD DO IF PERSONALLY PRESENT, WITH FULL POWER OF SUBSTITUTION AND REVOCATION, HEREBY RATIFYING AND CONFIRMING ALL THAT SAID ATTORNEY OR HIS SUBSTITUTE SHALL LAWFULLY DO OR CAUSE TO BE DONE BY VIRTUE HEREOF.

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND AND SEAL THIS 18th DAY OF May, 1983

Patricia Schechter
PATRICIA SCHECHTER

SIGNED, SEALED AND DELIVERED
IN THE PRESENCE OF

Dawn C. Fust
NOTARY PUBLIC OF NEW JERSEY

LICENSE EXPIRES 8/24/84

930435154227

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Schechter

Date: 10/9/86

Robert Mason

rec'd 10/12/86

9304351542 8

DENNIS SCHECHTER
999 ROUTE 53
MORRIS PLAINS, NJ 07950

1040

55-721/212

Sept. 16 19 86

Pay to the order of FRIENDS OF MATTINGLY $ 2,500.00

TWO THOUSAND FIVE HUNDRED DOLLARS AND 00/100----------DOLLARS

FIRST JERSEY

For Contribution

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1990

Mr. Alfred Hammack
221 Upper Riverdale Road, Apt. 5-E
Jonesboro, GA 30236

RE: MUR 2989
Alfred Hammack D/B/A
Morrow Professional
Building

Dear Mr. Hammack:

We have received your response dated August 9, 1990 to the finding by the Federal Election Commission that there is reason to believe that Alfred Hammack D/B/A Morrow Professional Building violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. A few questions remain, however, and we request that you submit written answers to the following questions:

1. State whether Morrow Professional Building was ever incorporated.

2. If the Morrow Professional Building was incorporated, indicate whether it was incorporated in September of 1986.

3. State whether the account used to make a contribution to Friends of Mattingly was your own personal account.

Please submit answers to the above questions in writing within 15 days of your receipt of this letter. If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351542 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1990

Ms. Brenda Clements
Folsom Construction Co.
2281 U.S. Hwy. 41 South
Cordele, GA 31015

RE: MUR 2989
Folsom Construction Co.

Dear Ms. Clements:

We received your letter dated August 20, 1990 in response to the finding by the Federal Election Commission that there is reason to believe that Folsom Construction Co. violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, we still need some additional information in order to clarify the circumstances surrounding your contribution. Enclosed are interrogatories concerning those remaining questions. Please submit written answers, under oath, to the enclosed questions within 15 days of your receipt of this letter.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Interrogatories

9304351543 0

INTERROGATORIES

1. State whether Folsom Construction Co. was incorporated in 1985.

2. The following questions refer to the check for $1,000 dated 5-28-90, which was drawn on the Folsom Construction Company account and made payable to the Georgia Tribute to the President.

   a) State whether the check was drawn on a corporate account.

   b) State whether the check was ever returned or voided.

   c) Identify the individual(s) who solicited this contribution from Folsom Construction Co.

   d) Submit copies of any solicitation letters or other materials connected with this contribution.

9304351154431

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 11, 1990

Mr. W. B. Hendry
President
Consolidated Tape & Label, Inc.
P.O. Box 2355
641 Smyrna, GA 30080

RE: MUR 2989
Consolidated Tape & Label, Inc.

Dear Mr. Hendry:

We received your letter dated August 14, 1990 regarding the finding by the Federal Election Commission that there is reason to believe that Consolidated Tape & Label Inc. violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The contribution in question was a check dated May 22, 1985, made payable to Georgia Tribute to the President - c/o Friends of Mattingly Comm. Enclosed is a copy of that check.

Also enclosed are interrogatories concerning that contribution. Please submit written answers, under oath, to the enclosed questions within 15 days of your receipt of this letter.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosures
Interrogatories
Check copy

9304351543 2

INTERROGATORIES

1. State whether Consolidated Tape & Label, Inc. was incorporated in 1985.

2. The following questions refer to the check dated 5-22-85 drawn on the Consolidated Tape & Label, Inc. account made payable to Georgia Tribute to the President/Friends of Mattingly Comm. (copy enclosed).

   a) State whether the check was drawn on a corporate account.

   b) State whether the check was ever returned or voided.

   c) Identify the individual(s) who solicited this contribution from Consolidated Tape & Label, Inc.

   d) Submit copies of any solicitation letters or other materials connected with this contribution.

9304351543 3

Federal Election Law requires
that we request the following information:

Occupation Printing Business (self-employed)
Employer Consolidated Tape & Label, Inc.
Employers Address 641 Smyrna Hill Drive

93043515434

CONSOLIDATED TAPE & LABEL, INC.
641 SMYRNA HILL DRIVE • SMYRNA (ATLANTA), GEORGIA 30080 • (404) 434-3158

$1000.00 DATE 5/22/85 CHECK NUMBER 11351

PAY 1 Thousand dollars and 00 cents

TO THE ORDER OF Georgia Tribute to
the President
P.O. Box 1986
Atlanta, Georgia 30301-9990
%Friends Mattingly Comm.

64-124
611

Trust Company Bank
of Cobb County
National Association / Smyrna, Georgia

WB Thurmond

[redacted]

OGC 8151

LAW OFFICES
COTTEN, DAY & SELFON
TWELFTH FLOOR
1899 L STREET, NORTHWEST
WASHINGTON, D. C. 20036
(202) 659-9505
TELECOPIER NO.: (202) 775-8359

JAMES M. DAY
BEN COTTEN*
BRUCE I. SELFON*
PATRICIA R. COLLINS*
DANIEL S. SCHUMACK*
EDWARD V. GREGOROWICZ, JR.
GEORGE R. SCHLOSSBERG**

*ALSO ADMITTED IN MARYLAND
**ALSO ADMITTED IN MARYLAND, VIRGINIA AND NEW YORK
***ALSO ADMITTED IN NEW YORK

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 12 AM 2:16

October 11, 1990

BY MESSENGER

MUR 2989

Elizabeth Campbell
Office of General Counsel
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Re: Friends of Mattingly

Dear Ms. Campbell:

I have just received the enclosed from Mr. Stewart, which will comprise our response on a documentary basis to the F.E.C. allegations. Messrs. Mattingly and Stewart have tried to go through some of the records to itemize matters for each of the alleged "wrongs" but time, resources, and state of the records, at this point, does not permit any more detailed analysis at this time.

We would, additionally, direct your attention to instructions submitted by the F.E.C. with regard to F.E.C. Form 3, and Schedule D, copies of which are attached and germane portions of which are circled. As this is being prepared, I am en route to Charlotte, North Carolina, where I am to commence a six to eight week trial in the U. S. District Court for the Western District of North Carolina, in the matter of Teague, et al. v. Bakker, et al., Civil Action No.: CC-87-514-M. I will be receiving material on a regular basis from my office, so that any correspondence from the F.E.C. will reach me, albeit somewhat tardily.

9304351543 5

On behalf of Senator Mattingly and Bill Stewart permit me to thank you and the other attendees at the conference. It is still our desire to enter into Pre Probable Cause Conciliation if we can reach agreement on the amounts involved and the wording of the Conciliation document.

Professionally yours,

Ben Cotten

Ben Cotten

BC/gr
Encl.

23043515436

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

October 12, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Southern Energy
P.O. Box 960
Brunswick, GA 31520

RE: MUR 2989
Southern Energy

Dear Madam or Sir:

On August 3, 1990, you were notified that the Federal Election Commission, on June 19, 1990, found reason to believe Southern Energy violated 2 U.S.C. § 441b(a). Enclosed are copies of the material that was sent to you at that time. Under the Federal Election Campaign Act of 1971, as amended, and Commission regulations, you have an opportunity to demonstrate that no action should be taken against Southern Energy.

A review of our files indicates that to date you have not responded to the Commission's findings. Unless we receive a response from you within 15 days, this matter will proceed to the next stage of the enforcement process.

Should you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

Enclosures
Notification letter dated August 3, 1990
Factual and Legal Analysis

9304351543 7

MUR 2989

Morris Brown College

Atlanta, Georgia 30314

BUSINESS OFFICE

RECEIVED
FEDERAL ELECTION COMMISSION
90 OCT 18 PM 1:43

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 18 PM 3:41

October 9, 1990

Ms. Lee Ann Elliott
Chairman
Federal Election Commission
Washington, D C 20463

Re: MUR 2989
Morris Brown College

Dear Ms. Elliott:

This will acknowledge receipt of your letter of August 3, 1990, which indicates that Morris Brown College violated 2U.S.C. 441b(a) of the Federal Election Campaign Act of 1971.

Since we do not recall the incident of the contribution to the Mattingly Campaign as stated, please provide us with the evidence of said contribution so that we might verify same. We further request that since we were unaware that such a contribution would have resulted in a violation of the Federal Regulations Campaign Act of 1971 the Commission take no further action regarding this apparent violation.

Your cooperation with regard to the above will be appreciated.

If there are further questions regarding this request, you may contact me at the above address or by telephone at (404) 221-2405.

Sincerely,

Charles W. Moore
Vice President for Finance

CW/b

9304351543 8

SINCE 1881

10/90/90

MUR 2989

INTERROGATORIES

1. State whether Folsom Construction Co. was incorporated in 1985. yes

2. The following questions refer to the check for $1,000 dated 5-28-90, which was drawn on the Folsom Construction Company account and made payable to the Georgia Tribute to the President.

   a) State whether the check was drawn on a corporate account. yes

   b) State whether the check was ever returned or voided. NO

   c) Identify the individual(s) who solicited this contribution from Folsom Construction Co. Not available

   d) Submit copies of any solicitation letters or other materials connected with this contribution. NONE

9304351543 9

OGC 8284

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 18, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 19 AM 10:59

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989 (Falcone)

Dear Mr. Noble:

Please find enclosed the Affidavits of Carol Falcone and her husband, Richard A. Falcone, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mrs. Falcone in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Carol Falcone made excess contributions to the 1986 general election campaign account of Friends of Mattingly totaling $1,800. As Mrs. Falcone states in her Affidavit, the $2,500 contribution in question was not a contribution from her at all. The check was written on a joint account with her husband, but the allocation letters signed shortly after the contribution was made and provided to Friends of Mattingly clearly informed the Mattingly campaign that the amount represented contributions from Richard A. Falcone and Jim Kelly. Those contributions should not should have been reported as attributable to Mrs. Falcone.

Separately, Mrs. Falcone did make a contribution for $300 to Friends of Mattingly for the purchase of two tickets to a fundraising dinner. Accordingly, her contribution was within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a). She has stated that she assumed that if the Mattingly campaign had any concerns regarding the permissibility of her contribution with her husband, they would properly allocate the amount within the

9304351540

permissible limits or refund it, rather than misreport the contribution.

Moreover, the allocation letters signed by Richard A. Falcone and Jim Kelly (and attached to Richard Falcone's Affidavit) demonstrate that when the $2,500 contribution was made in 1986, both Mr. Falcone and Mr. Kelly made individual efforts to assure that their contributions were properly reported to the Mattingly campaign and were allocated between the primary and general election accounts within permissible limits of the law. Mr. Falcone received representations that the Mattingly campaign did indeed have a primary debt. Friends of Mattingly apparently disregarded the allocation instructions of Mr. Falcone and Mr. Kelly with respect to attribution of the amount to Mrs. Falcone and also with respect to the division of the contribution between the two accounts. This carelessness should not be imputed to the Falcones; the burden of proper reporting, redesignation or refund of the contribution, if required, fell squarely on the Mattingly campaign.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Carol Falcone violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. & Mrs. Richard A. Falcone

2304351544 1

BEFORE THE FEDERAL ELECTION COMMISSION

County of Providence)
) MUR 2989
State of Rhode Island)

AFFIDAVIT OF RICHARD A. FALCONE

Richard A. Falcone, first being duly sworn, deposes and says:

1. I am Richard A. Falcone. On September 23, 1986, my wife, Carol Falcone, signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my wife and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given between my co-worker, Jim Kelly, and myself resulting in a contribution of $1,250 from me and $1,250 from Jim Kelly. It was my intent that no portion of that contribution be attributed to my wife. The joint checking account was composed of joint funds of my wife and me. Jim Kelly reimbursed my wife at the time for his share of the contribution.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that $1,250 of the contribution was to be attributed to me. It was my understanding that Jim Kelly likewise executed a

2304351-54442

letter to the Mattingly campaign (copy attached hereto) indicating his share of the contribution. To my knowledge, both of these letters were delivered to the Mattingly committee. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution between Jim Kelly and me.

4. Jim Kelly and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, I indicated in the above-referenced letter to the Mattingly campaign that $250 of my contribution and $250 of Jim Kelly's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign. Jim Kelly made a similar designation.

9304351544 3

Richard A. Falcone

State of Rhode Island)
County of PROVIDENCE) ss.

Subscribed to and sworn before me this 30th day of September, 1990.

Notary Public

My Commission Expires: JUNE 1991

BEFORE THE FEDERAL ELECTION COMMISSION

County of Providence)
) MUR 2989
State of Rhode Island)

AFFIDAVIT OF CAROL FALCONE

Carol Falcone, first being duly sworn, deposes and says:

1. I am Carol Falcone. On September 23, 1986, I signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my husband, Richard A. Falcone, and myself (copy of check attached hereto).

2. Although I signed the check, it was not my intention to make a contribution to the Mattingly campaign for myself. The amount of the check represents a contribution of $1,250 from my husband, Richard A. Falcone, and a contribution of $1,250 from his co-worker, Jim Kelly. The joint checking account was composed of the joint funds of my husband and me, and Jim Kelly reimbursed me at the time for his share of the contribution.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that $1,250 of the contribution was to be attributed to him. It was my understanding that Jim Kelly likewise executed a letter to the Mattingly campaign (copy attached hereto) indicating his share of the contribution. To my knowledge, both of these letters were delivered to the Mattingly committee. It was our understanding at the time that that

2304351544 4

action was sufficient to designate the contribution between Jim Kelly and my husband.

4. On September 15, 1986, I signed a separate check payable to Friends of Mattingly for $300 (copy of check attached hereto), also drawn on my joint account with my husband. As the attached notation indicates, this contribution should also have been allocated between my husband and myself. I would never have knowingly made a contribution in excess of permissible limits of the law. I assumed that the Mattingly committee would properly allocate these contributions between its primary and general election campaigns to keep our contributions within the permissible limits of the law, or alternatively, the Mattingly committee would return any excess portions of those contributions to me.

Carol Falcone
Carol Falcone

State of Rhode Island)
County of PROVIDENCE) ss.

Subscribed to and sworn before me this _____ day of September, 1990.

Dorothy Mantz
Notary Public

My Commission Expires: JUNE 1991

9304351544 5

CITIZENS KEY F CLUB

CAROL FALCONE 7-85
RICHARD A. FALCONE
150 NORTH RD
HOPE, RI 02831

784

9/23/ 19 86 57-12/115

PAY TO THE ORDER OF Friends of Mattingly $ 2500 00

Two thousand five hundred dollars 00/100 DOLLARS

THORNTON OFFICE
CITIZENS BANK
CITIZENS TRUST COMPANY
PROVIDENCE, RHODE ISLAND

MEMO Reagan Picture

Carol Falcone

930435154446

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, we, the undersigned, have purchased "photo op" tickets for the Mattingly Rally. Please let this letter confirm our understanding that the contribution for the photo op to the extent of $1,000.00 for each of us constitutes a contribution to Friends of Mattingly for use in the general election. We further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt we have each contributed $250.00.

Although for our convenience we have only provided you with one check for the combined amount, we did want to clarify our understanding.

Please advise us if our understanding is contrary to the facts.

Sincerely,

Date: 11/17/86 Richard Fallone

93043515447

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, I have purchased one-half ($1,250.00) of a "photo op" ticket for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: Oct 9, 1986

23043551548

PAY TO THE ORDER OF Friends of Mattingly 9/16 19 86 57-12

Three hundred dollars $300.00 DOLLARS

CITIZENS BANK
CITIZENS TRUST COMPANY
PROVIDENCE, RHODE ISLAND

Richard A. Falcone
Senior Vice President

donation from Carol Falcone 186

Please send us 2 tickets @ $150.00 each for the reception + seats @ the Fund Raiser for Mattingly. VIP reception for Reagan
We understand that we will pick up our tickets @ the Reception. (V.I.P)

Thank you,

occupation → A.L. Williams

Name Richard Falcone
Wife - Carol Falcone
1291 Plainfield St.
Johnston, RI
02919

9304351544 49

1291 Plainfield Street / Johnston, RI 02831 (401) 944-1890
A.L. WILLIAMS IS A NETWORK OF INDEPENDENT BUSINESSMEN AND WOMEN MARKETING LIFE INSURANCE AND OTHER FINAN
Representing: Massachusetts Indemnity & Life Insurance Company/Regional Office: Atlanta, Geo
Representing: First American National Securities, Incorporated

19318

OGC 8285

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 18, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 19 AM 10:59

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989 (King)

Dear Mr. Noble:

Please find enclosed the Affidavits of Claire A. King and Kevin S. King, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Ms. King in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Claire A. King made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $3,250 and alleges excess contributions by Ms. King totaling $2,250. At the time of these contributions, Claire A. King and Kevin S. King were married. As the attached Affidavits clearly state, the contributions noted by the Commission were from Claire and Kevin King's joint checking account and represented contributions from both of them, to be allocated between the two of them, and designated to the Mattingly campaign's primary and general election accounts. The memo notations of the face of the checks numbered 2743 and 2744 state that the $2,000 amount was to be allocated to the general campaign, and the Check for $500 was to be used to help retire the Mattingly campaign's primary debt.

Moreover, the allocation letter signed by Kevin King (and attached to both Affidavits) demonstrates that at the time the $2,500 in contributions (checks # 2743 and 2744) were made in 1986, he made a further effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law.

2304351545O

In addition, Kevin King wrote two more checks to the Mattingly campaign. The first was for $500 (check #2836) and on the face of the check appears "Kevin King - Primary Debt Reduction;" and the second for $750 (check #2835) states "Claire King - Primary Debt Reduction." Claire King has stated in her Affidavit that she authorized this contribution from her joint account with her former husband. Thus, the Kings made every effort to insure that their contributions were properly reported to the Mattingly campaign. Furthermore, the Kings received representations that the Mattingly campaign did indeed have a primary debt and that these contributions to retire the primary debt would be used for that purpose. The burden of proper reporting, redesignation and refund of a contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Kings. The FEC's "G Index" of all contributors making contributions of $500 or more shows contributions of $1,000 each from Claire A. King (frame 1000) and Kevin S. King (frame 1009) to the Mattingly campaign's general election account and a contributions of $750 from Claire A. King (frame 1000) and $500 from Kevin S. King (frame 1009) to the primary accounts. (Copies of the relevant frames of the FEC 1986 "G Index" are attached hereto). These contributions, along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt, are also reflected in Schedule A of the 1986 pre-general and post-general reports of Friends of Mattingly. (See pages 11 and 96 of the pre-general report and page 2 of the post-general report, attached hereto). These entries in the FEC's records further evidence Claire King's and Kevin King's intention at the time of their contributions, as stated in their Affidavits. Therefore, both Claire and Kevin King's contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a).

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Claire A. King violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Ms. Claire A. King
Mr. Kevin S. King

2304351545 1

BEFORE THE FEDERAL ELECTION COMMISSION

County of Gwinnett)
) MUR 2989
State of Georgia)

AFFIDAVIT OF KEVIN S. KING

Kevin S. King, first being duly sworn, deposes and says:

1. I am Kevin S. King. In 1986, I was married to Claire A. King. On September 30, 1986, she signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 respectively, drawn on our joint account (copies of checks attached hereto).

2. Contemporaneously with the giving of those contributions to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with Claire A. King, resulting in a contribution of $1,250 from each of us.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between Claire A. King and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. Claire A. King and I understood that there was a campaign debt from the primary election and that we could

9304351545 2

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution be allocated to the payment of that primary debt and that the remaining $1,000 of my donation be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contribution was made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from Claire A. King and me between the campaign's primary and general election accounts.

6. Additionally, on October 31, 1986, I signed two checks payable to Friends of Mattingly for the amounts of $750 and $500 respectively, from the same joint account (copies of checks attached hereto). My former wife was aware of and agreed to make these contributions.

7. The faces of the two above-referenced checks (Nos. 2835 and 2836) clearly indicate the appropriate attribution of these contributions. Check No. 2835 (for $750) should have been allocated to the retirement of the Mattingly campaign's primary debt and represented a contribution solely from my former wife, Claire A. King. Check No. 2836 (for $500) should have been allocated to

23043515453

retirement of the Mattingly campaign's primary debt and was a contribution solely from myself.

Kevin S. King

State of Georgia)
County of Gwinnett) ss.

Subscribed to and sworn before me this 3rd day of October, 1990.

Betty A. Futral
Notary Public

Notary Public, Gwinnett County, Georgia
My Commission Expires Jan. 30, 1994

My Commission Expires: _____

9304351554

BEFORE THE FEDERAL ELECTION COMMISSION

County of Fulton)
) MUR 2989
State of Georgia)

AFFIDAVIT OF CLAIRE A. KING

Claire A. King, first being duly sworn, deposes and says:

1. I am Claire A. King. In 1986, I was married to Kevin S. King. On September 30, 1986, I signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 respectively, drawn on my joint account with Kevin S. King (copies of checks attached hereto).

2. Contemporaneously with the giving of those contributions to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with Kevin S. King, resulting in a contribution of $1,250 from each of us.

3. Shortly thereafter, Kevin S. King signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

2304351545

4. I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also my intent, contemporaneous with the making of that donation, that $250 of my contribution be allocated to the payment of that primary debt and that the remaining $1,000 of my donation be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contributions were made, Kevin S. King signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from us between the campaign's primary and general election accounts.

6. Additionally, on October 31, 1986, Kevin S. King signed two checks payable to Friends of Mattingly for the amounts of $750 and $500 respectively, from the same joint account (copies of checks attached hereto). I was aware of and agreed to make these contributions.

7. The faces of the two above-referenced checks (Nos. 2835 and 2836) clearly indicate the appropriate attribution of the contribution. Check No. 2835 (for $750) should have been allocated to the retirement of the Mattingly

9304351545 6

campaign's primary debt and represented a contribution solely from me.

Claire A. King

State of Georgia)
County of Fulton) ss.

Subscribed to and sworn before me this 3 day of October, 1990.

Esther Rawlings
Notary Public

Notary Public, Fulton County, Georgia
My Commission Expires April 23, 1994

My Commission Expires: _____

2304351 54457

KEVIN S. OR CLAIRE A. KING
5505 ERROL PLACE
ATLANTA, GEORGIA 30327

DATE	INVOICE	AMOUNT	

64-240
611

2743

PAY Two Thousand and no/100 DOLLARS

CHECK AMOUNT

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NO.	
9/30/86	Friends of Mattingly	GROSS / DISCOUNT	2743	$ 2000.00

KEVIN S. OR CLAIRE A. KING

for general election campaign

FIDELITY NATIONAL BANK
DECATUR, GEORGIA

Claire King

KEVIN S. OR CLAIRE A. KING
5505 ERROL PLACE
ATLANTA, GEORGIA 30327

DATE	INVOICE	AMOUNT	

64-240
611

2744

PAY Five Hundred & 00/100 DOLLARS

CHECK AMOUNT

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NO.	
9/30/86	Friends of Mattingly	GROSS / DISCOUNT	2744	$ 500.00

KEVIN S. OR CLAIRE A. KING

contribution to victory fund used in primary election campaign 9/86

FIDELITY NATIONAL BANK
DECATUR, GEORGIA

Claire King

Recd 10/14/86 Robert Mann

930435154 58

KEVIN S. OR CLAIRE A. KING
5505 ERROL PLACE
ATLANTA, GEORGIA 30327

DATE	INVOICE	AMOUNT

64-240
611

2836

PAY FIVE HUNDRED only DOLLARS

CHECK AMOUNT

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NO.	
10/31/86	Friends of Mattingly		2836	$ 500.00
		GROSS / DISCOUNT		

KEVIN KING - PRIMARY DEBT REDUCTION

FIDELITY NATIONAL BANK
DECATUR, GEORGIA

KEVIN S. OR CLAIRE A. KING

930435 9

KEVIN S. OR CLAIRE A. KING
5505 ERROL PLACE
ATLANTA, GEORGIA 30327

DATE	INVOICE	AMOUNT

64-240
611

2835

PAY Seven Hundred Fifty only DOLLARS

CHECK AMOUNT

DATE	TO THE ORDER OF	DESCRIPTION	CHECK NO.
10/31/86	Friends of Mattingly	GROSS / DISCOUNT / NET	

$ 750.00

CLAIRE KING - PRIMARY
DEBT REDUCTION

FIDELITY NATIONAL BANK
DECATUR, GEORGIA

KEVIN S. OR CLAIRE A. KING

⑈930435⑈ 64

October 10, 1986

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary election debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

We have made this contribution by the payment of two checks, one for $2,000 ($1,000.00 each), for our general election contribution, and one for $500 ($250.00 each), toward the retirement of the primary election debt.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Kevin S. King

93043515461

OGC 8286

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 18, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 19 AM 10:59

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989 (Martonik)

Dear Mr. Noble:

Please find enclosed the Affidavits of George J. Martonik, Jr. and his wife, Jacqueline Martonik, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Martonik in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that George J. Martonik, Jr. made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mr. Martonik totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission were from George and Jacqueline Martonik's joint checking account and represent contributions by both Mr. & Mrs. Martonik, to be allocated between the two of them, and designated to the Mattingly campaign's primary and general election accounts. Therefore, the Martoniks' contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a).

Moreover, the clear notation on the face of the check as well as the allocation letter signed by George Martonik (both attached to his Affidavit) demonstrate that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. The Martoniks received

2304351546 2

representations that the Mattingly campaign did indeed have a primary debt. The burden of proper reporting, redesignation and refund of the contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Martoniks. Please note, however, that the records have misspelled the Martonik's name as "Mortonik." The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from "Jacqueline Mortonik" and "George J. Mortonik" (frame 4417) to the Mattingly campaign's general election account (a copy of the relevant frame of the FEC 1986 "G Index" is attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 13 and 119 attached hereto). These entries in the FEC's records further demonstrate Jacqueline and George Martonik's intention at the time of the contribution, as stated in their Affidavits, and evidence the Mattingly campaign's receipt of their request for proper allocation.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that George J. Martonik, Jr. violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. and Mrs. George J. Martonik, Jr.

9304351546 3

BEFORE THE FEDERAL ELECTION COMMISSION

County of Lucas)
) MUR 2989
State of Oh)

AFFIDAVIT OF GEORGE J. MARTONIK, JR.

George J. Martonik, Jr., first being duly sworn, deposes and says:

1. I am George J. Martonik, Jr. On September 15, 1986, I signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my wife, Jacqueline Martonik, and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

2304351-5464

4. My wife and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. To evidence our intent, I indicated on the check that $2,000 should be allocated to the general election campaign and that $500 should be allocated to the debt of the primary election campaign.

6. As further evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contributions were made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife

93043515465

and me between the campaign's primary and general election accounts.

George J. Martonik, Jr.

State of Ohio)
County of Lucas) ss.

Subscribed to and sworn before me this 4 day of ~~September,~~ October 1990.

Notary Public

My Commission Expires: 11-24-90

9304351546 6

BEFORE THE FEDERAL ELECTION COMMISSION

County of Du)
) MUR 2989
State of Penn)

AFFIDAVIT OF JACQUELINE MARTONIK

Jacqueline Martonik, first being duly sworn, deposes and says:

1. I am Jacqueline Martonik. On September 15, 1986, my husband, George J. Martonik, Jr., signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my husband and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

2304351546 7

4. My husband and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. To evidence our intent, my husband indicated on the check that $2,000 should be allocated to the general election campaign and that $500 should be allocated to the debt of the primary election campaign.

6. As further evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contributions were made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions

93043515468

from my husband and me between the campaign's primary and general election accounts.

Jacqueline Martonik
Jacqueline Martonik

State of [illegible])
County of Travis) ss.

Subscribed to and sworn before me this 4 day of ~~September~~ October, 1990.

[illegible]
Notary Public

My Commission Expires: 11-24-90

93043515469

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: 10.6.86

George J. Martonik, Jr.

Robert Mason

rcd 10-12-86

2304351547 0

George J. MARTONIK, JR.
Jacqueline Martonik
5016 178th Ave. E.
Sumner, Washington 98390

"2,000 To the General Election
500" To Retire the Primary Election Debt

1 FIRST BANK 469
19-2/1250

9-15 1986

PAY TO THE ORDER OF Friends of Mattingly $2,500.00

Two Thousand Five Hundred Dollars and 00/100 DOLLARS

FIRSTLINE
Puyallup Branch - P.O. Box 2[illegible]
Puyallup, Washington 98371

For

George J. Martonik

OGC 8287

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 18, 1990

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989 (Orender)

Dear Mr. Noble:

Please find enclosed the Affidavits of William A. Orender and his wife, Carol Orender, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Orender in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that W. A. Orender made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mr.Orender totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission were from William A. and Carol Orender's joint checking account and represent contributions by both Mr. & Mrs. Orender, to be allocated between the two of them, and designated to the Mattingly campaign's primary and general election accounts. Therefore, William Orender's contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a).

Moreover, the allocation letter signed by William Orender (and attached to his Affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. Both Mr. and Mrs. Orender subsequently received thank-you notes from the Mattingly campaign that confirmed this allocation of the contributions.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 19 AM 10:59

9304351547 1

The Commission's public records likewise reflect the allocation of the $2,500 contribution intended by the Orenders. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from W. A. Orender and Mrs. Carol Orender (frame 5223) to the Mattingly campaign's general election account (A copy of the relevant frame of the FEC 1986 "G Index" is attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 14 and 126 attached hereto). These entries in the FEC's own records further evidence the Orenders' intention at the time of the contribution, as stated in their Affidavits.

Separately, Carol Orender made an additional $300 contribution to the Mattingly campaign from a personal checking account. The Orenders received representations that the Mattingly campaign did indeed have a primary debt. As Mrs. Orender has explained in her Affidavit, she assumed that her contribution would be properly allocated within the limits of the law. We note, however, that the checks list two different addresses for Carol Orender. The Mattingly campaign reported the $300 contribution from "Ms. Carol Orender" in Frisco, Texas, and the $1,000 contribution from "Mrs. Carol Orender" in Dallas, Texas (see page 126 of the 1986 pre-general report attached hereto). Nevertheless, the burden of proper reporting, redesignation and refund of the contribution, if required, fell squarely on the Mattingly campaign.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that William A. Orender violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. & Mrs. William A. Orender

2304351547 2

BEFORE THE FEDERAL ELECTION COMMISSION

County of Dallas)
) MUR 2989
State of Texas)

AFFIDAVIT OF WILLIAM A. ORENDER

William A. Orender, first being duly sworn, deposes and says:

1. I am William A. Orender. On September 15, 1986, I signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my wife, Carol Orender, and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My wife and I understood that there was a campaign debt from the primary election and that we could

9304351547 3

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contributions were made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife and me between the campaign's primary and general election accounts.

6. Subsequently, my wife and I received thank-you notes from Matt Mattingly (copies attached hereto) acknowledging receipt and allocation of our contributions.

William A. Orender

State of Texas)
County of Dallas) ss.

ESTER V. HARLESS
Notary Public
STATE OF TEXAS
My Comm. Exp. 8-07-92

Subscribed to and sworn before me this 29th day of September, 1990.

Ester V. Harless
Notary Public--Ester V. Harless

My Commission Expires: May 7, 1992

9304351547 4

BEFORE THE FEDERAL ELECTION COMMISSION

County of Dallas)
) MUR 2989
State of Texas)

AFFIDAVIT OF CAROL ORENDER

Carol Orender, first being duly sworn, deposes and says:

1. I am Carol Orender. On September 15, 1986, my husband, William A. Orender, signed a check payable to Friends of Mattingly for the amount of $2,500, drawn on a joint account of my husband and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My husband and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and

9304351547 5

the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contributions were made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my husband and me between the campaign's primary and general election accounts.

6. Subsequently, my husband and I received thank-you notes from Matt Mattingly (copies attached hereto) acknowledging receipt and allocation of our contributions.

7. On September 23, 1986, I signed a separate check payable to Friends of Mattingly for $300 (copy of check attached hereto). I assumed that the Mattingly committee would properly allocate these contributions between its primary and general election campaigns to keep my

9304351547 6

contributions within the permissible limits of the law, or alternatively, the Mattingly committee would return any excess portions of those contributions to me.

Carol Orender

State of TEXAS)
County of DALLAS) ss.

ESTER V. HARLESS
Notary Public
STATE OF TEXAS
My Comm. Exp. 5-07-92

Subscribed to and sworn before me this 9th day of October, 1990.

Notary Public - Ester V. Harless

My Commission Expires: May 7, 1992

93043515477

CAROL ORENDER

747

ROUTE 2, BOX 185-K-5
FRISCO, TEXAS 75034

9/19/23 19 86

PAY TO THE ORDER OF Friends of Mattingly $ 300 00

Three hundred and 00/100 DOLLARS

FIRST NATIONAL BANK of FRISCO
PHONE 377-6781
P. O. BOX 1000
FRISCO, TEXAS 75034

FOR Repub. Rally tckts (2) Carol Orender

930435154778

079 35 109
PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GA
079 35 109
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY
GENERAL ACCOUNT

C&S BANKS
ATLANTA, GEORGIA
64-5
64-5

OCT 02
C&S NATL BK
ATLANTA GA
PAY ANY BANK

MACK MATTINGLY
FRIENDS OF MACK MATTINGLY CLUB

November 12, 1986

Mrs. Carol Orender
4332 Beltwood Parkway South
Dallas, TX 75234

Dear Mrs. Orender:

Thank you for your $1250 contribution to my Senate campaign and for helping to make President Reagan's visit to Georgia on my behalf such a wonderful success.

Carolyn and I very much appreciate all your friendship and support during this important campaign.

Sincerely,

PAID FOR BY FRIENDS OF MATTINGLY

93043515479

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: 10/9/86 W A Orender

Mcd 10/12/86 Robert Mason

9304351554880

W. A. OR CAROL ORENDER 339

4332 BELTWOOD PKWY. SOUTH
DALLAS, TX 75234

OCCUPATION - AC Williams 9/15 19 86 88-569/1119

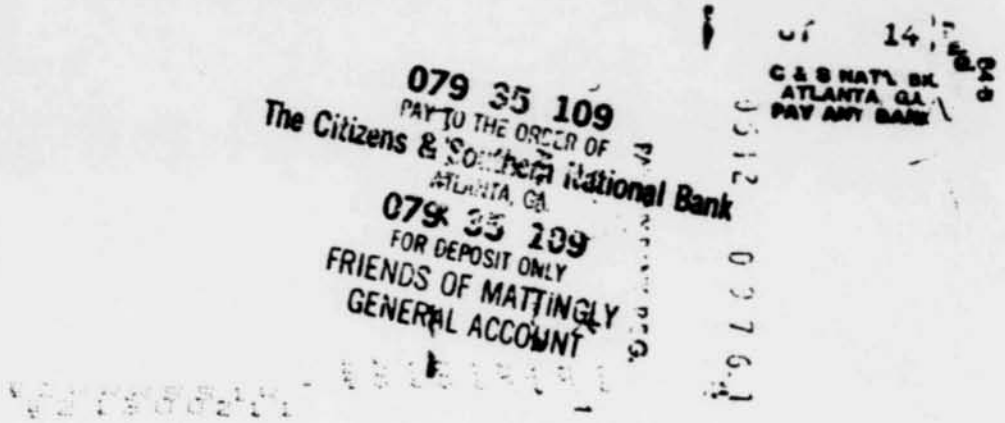
PAY TO THE ORDER OF Friends of Mattingly $ 2,500.00

Two Thousand Five Hundred DOLLARS

InterFirst
InterFirst South Addison
4500 Beltline Rd. Addison, Texas 75001

FOR Primary Contribution W A Orender

930435154811



OGC 8288

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 18, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 19 AM 10:59

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989 (Turley)

Dear Mr. Noble:

Please find enclosed the Affidavits of Robert Lee Turley and his wife, Carol Jean Turley, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Turley in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Robert Lee Turley made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mr. Turley totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission represent contributions from both Mr. & Mrs. Turley, to be allocated between the two of them and designated to the Mattingly campaign's primary and general election accounts. Therefore, the Turleys' contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a).

Moreover, the allocation letter signed by Robert Turley (and attached to his Affidavit) demonstrates that at the time the contributions were made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within the permissible limits of the law. The Turleys received representations that the Mattingly campaign did indeed have a primary debt. The burden of proper reporting, redesignation or refund of the contribution, if required, fell squarely on the Mattingly campaign.

9304351548 2

Even the Commission's public records reflect the allocation intended by the Turley's. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from Robert Lee Turley and Mrs. Robert Lee Turley (frame 3025) to the Mattingly campaign's general election account. (A copy of the relevant frame of the FEC 1986 "G Index" is attached hereto.) These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 17 and 171 of the Mattingly campaign's pre-general report attached hereto). These entries in the FEC's records further evidence Robert and Carol Turley's intention at the time of the contribution as stated in their Affidavits.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that Robert Lee Turley violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. and Mrs. Robert L. Turley

9304351543 3

BEFORE THE FEDERAL ELECTION COMMISSION

County of Collier)
) MUR 2989
State of Florida)

AFFIDAVIT OF ROBERT LEE TURLEY

Robert Lee Turley, first being duly sworn, deposes and says:

1. I am Robert Lee Turley. On September 16, 1986, I signed a check payable to Friends of Mattingly for the amount of $2,500 (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my wife, Carolyn Jean Turley, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was my understanding at the time, that that action was sufficient to designate the allocation of the contribution equally between the two of us.

4. I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also my intent, contemporaneous with the making of

2304351-54884

that donation, that $250 of my contribution be allocated to the payment of that primary debt and that the remaining $1,000 of my donation be allocated toward the Mattingly general election campaign.

5. As further evidence of our intent at the time the contribution was made, I signed the above referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from us between the campaign's primary and general election accounts.

Robert Lee Turley

State of Florida)
County of Collier) ss.

Subscribed to and sworn before me this 4th day of October, 1990.

Notary Public

My Commission Expires: Notary Public, State of Florida My Commission Expires Sept. 15, 1991 Bonded Thru Fain Insurance Inc.

93043515485

BEFORE THE FEDERAL ELECTION COMMISSION

County of Collier)
) MUR 2989
State of Florida)

AFFIDAVIT OF CAROLYN JEAN TURLEY

Carolyn Jean Turley, first being duly sworn, deposes and says:

1. I am Carolyn Jean Turley. On September 16, 1986, my husband, Robert Lee Turley, signed a check payable to Friends of Mattingly for the amount of $2,500 (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given by us, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was my understanding at the time, that that action was sufficient to designate the allocation of the contribution equally between the two of us.

4. I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was

2304351-54886

therefore also my intent, contemporaneous with the making of that donation, that $250 of my contribution be allocated to the payment of that primary debt and that the remaining $1,000 of my donation be allocated toward the Mattingly general election campaign.

5. As further evidence of our intent at the time the contribution was made, my husband signed the above referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from us between the campaign's primary and general election accounts.

Carolyn Jean Turley

Carolyn Jean Turley

State of Florida)
County of Collier) ss.

Subscribed to and sworn before me this 4th day of October, 1990.

Notary Public
Notary Public, State of Florida
My Commission Expires Sept. 15, 1991
Bonded Thru Troy Fain - Insurance Inc.

My Commission Expires:

P30435154887

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

Sincerely,

Date: 10-9-86

Robert C Turley

Rcd 10/12/86

Robert Mason

30435154888

ROBERT LEE TURLEY
PH. 813-394-7412
SUMMIT HOUSE 1805
280 SOUTH COLLIER BLVD.
MARCO ISLAND, FL 33937

1199

63-243/670 065

9-16 1986

PAY TO THE ORDER OF Friends of Mattingly $ 2500 00

Twenty Five Hundred Dollars & 00/100 DOLLARS

NCNB National Bank of Florida Naples, FL 33940

FOR

Robert C Turley

"001199" 1:067002436: 350068 2038"

OGC 8290

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 18, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 19 AM 10:59

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989 (Beyer)

Dear Mr. Noble:

Please find enclosed the Affidavits of John "Treacy" Beyer and his wife, Darcy F. Beyer, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Beyer in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that John Treacy Beyer made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mr. Beyer totaling $1,500. As the attached Affidavits clearly state, the contributions noted by the Commission were from Darcy and Treacy Beyer's joint checking account and represent contributions by both Mr. & Mrs. Beyer, to be allocated between the two of them, and designated to the Mattingly campaign's primary and general election accounts. This distribution of the contributions was clearly indicated on the face of the checks. Therefore, the Beyers' contributions were within the permissible $1,000 limit per person per election pursuant to 2 U.S.C.§ 441a(a).

Moreover, the Beyers' allocation letter to Robert Mason, the Mattingly campaign's finance director, as well as the January 10, 1989, letter signed by both Mr. and Mrs. Beyer (and attached to their Affidavits) further demonstrate that at the time the contributions were made in 1986 and again in 1989, the Beyers made an individual effort to assure that their contributions were properly reported to the Mattingly

2304351548 9

campaign and were within permissible limits of the law. The Beyers received representations that the Mattingly campaign did indeed have a primary debt. The burden of proper reporting, redesignation and refund of the contribution, if required, fell squarely on the Mattingly campaign.

Even the Commission's public records reflect the allocation intended by the Beyers. The FEC's "G Index" of all contributors making contributions of $500 or more shows a contribution of $1,000 each from Mr. John Treacy Beyer and Mrs. Darcy F. Beyer (frame 1703) to the Mattingly campaign's general election account (a copy of the relevant frame of the FEC 1986 "G Index" is attached hereto). These contributions along with the smaller $250 amounts to help retire the Mattingly campaign's primary debt are also reflected in Schedule A of the 1986 pre-general report for Friends of Mattingly (see pages 3 and 13 of that report attached hereto). These entries in the FEC's records further support Treacy and Darcy Beyer's intention at the time of the contribution, as stated in their Affidavits, and evidence the Mattingly campaign's receipt of their request for proper allocation.

Accordingly, I urge the General Counsel to recommend no probable cause to believe that John Treacy Beyer violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. and Mrs. John Treacy Beyer

2304351549O

BEFORE THE FEDERAL ELECTION COMMISSION

County of Gwinett)
) MUR 2989
State of Georgia)

AFFIDAVIT OF JOHN TREACY BEYER

John Treacy Beyer, first being duly sworn, deposes and says:

1. I am John Treacy Beyer. On October 1, 1986, I signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 respectively, drawn on a joint account of my wife, Darcy F. Beyer, and myself (copies of checks attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. Although the copy attached to this Affidavit was my copy for my records and is unsigned, I do remember signing and sending the original. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally

9304351549 1

between the two of us. In response to an inquiry from the Mattingly campaign in December 1988 (copy attached hereto), my wife and I sent a follow-up letter in January 1989 (copy attached hereto) signed by both of us further clarifying the allocation of our contributions.

4. My wife and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contributions were made, my wife and I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife and me between the campaign's primary and general election accounts. This allocation is further

9304351549 2

evidenced in our above-referenced January 1989 letter to the Mattingly campaign.

John Treacy Beyer

State of Georgia)
County of DeKalb) ss.

Subscribed to and sworn before me this 28 day of September, 1990.

Patricia E. Newsome
Notary Public

Patricia E. Newsome
Notary Public, Gwinnett County, Georgia
My Commission Expires May 12, 1994

My Commission Expires: _____

9304351-5493

BEFORE THE FEDERAL ELECTION COMMISSION

County of Gwinett)
) MUR 2989
State of Georgia)

AFFIDAVIT OF DARCY F. BEYER

Darcy F. Beyer, first being duly sworn, deposes and says:

1. I am Darcy F. Beyer. On October 1, 1986, my husband, John Treacy Beyer, signed two checks payable to Friends of Mattingly for the amounts of $2,000 and $500 respectively, drawn on a joint account of my husband and myself (copies of checks attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be given jointly with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us. In response to an inquiry from the Mattingly campaign in December 1988 (copy attached hereto), my husband and I sent a follow-up letter in January 1989 (copy attached

2304351549 4

hereto) signed by both of us further clarifying the allocation of our contributions.

4. My husband and I understood that there was a campaign debt from the primary election and that we could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate our contributions between the primary and general campaigns at the time the contributions were made, my husband and I signed the above-referenced letters to the Mattingly campaign which indicated the appropriate allocation of the contributions from my husband and me between the campaign's primary and general election accounts. This allocation is further

2304351-54925

evidenced in our above-referenced January 1989 letter to the Mattingly campaign.

Darcy F. Beyer
Darcy F. Beyer

State of Georgia)
County of Gwinnett) ss.

Subscribed to and sworn before me this 28 day of September, 1990.

Patricia E. Newsome
Notary Public
Patricia E. Newsome
Notary Public, Gwinnett County, Georgia
My Commission Expires May 12, 1994

My Commission Expires: _____

9304351549 96

JOHN TREACY BEYER 13
DARCY F. BEYER
353 ARGONNE DRIVE, NW.
ATLANTA, GA 30305

113

10/1 19 86 64-7/610

PAY TO THE ORDER OF Friends of Mattingly $ 2,000 00

— two thousand & 00/100 DOLLARS

MONEY MARKET PLUS

Bank South
Atlanta, Georgia

MEMO contribution to General Election Campaign - 11/86

JOHN TREACY BEYER 13
DARCY F. BEYER
353 ARGONNE DRIVE, NW.
ATLANTA, GA 30305

114

10/1 19 86 64-7/610

PAY TO THE ORDER OF Friends of Mattingly $ 500 00

— five hundred only DOLLARS

MONEY MARKET PLUS

Bank South
Atlanta, Georgia

MEMO contri. to retire debt incurred in his election campaign 9/86

rec'd 10/12/86 Robert Mann

930435154997

FILE

October 10, 1986

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary election debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

We have made this contribution by the payment of two checks, one for $2,000 ($1,000.00 each), for our general election contribution, and one for $500 ($250.00 each), toward the retirement of the primary election debt.

Please advise me if my understanding is contrary to the facts.

Sincerely,

John Treacy Beyer

93043515498

received
2/6/89

JOHN TREACY BEYER
353 Argonne Drive, Northwest
Atlanta, Georgia 30305

January 10, 1989

Mr. Bob Stewart
Friends of Mattingly Committee
P.O. Box 1986
Atlanta, GA 30301-1986

Dear Bob:

I recently sent you a response to your request regarding allocation of an "excess" contribution. I would like to clarify that response.

As shown on the attached letter, dated October 10, 1986, to Robert Mason, a total of $2500 was contributed to the Friends of Mattingly Committee by my wife Darcy, and myself. That amount was allocated in the following manner:

$1,000	from John Treacy Beyer for the general election
250	from John Treacy Beyer for the primary election
1,000	from Darcy Beyer for the general election
250	from Darcy Beyer for the primary election

I hope this letter clarifies matters.

Very truly yours,

John Treacy Beyer Darcy Beyer

JTB/pr

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OGC 8289

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 18, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 19 AM 10:59

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989 (Walker)

Dear Mr. Noble:

Please find enclosed the Affidavit of Richard A. Walker and the corresponding documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Walker in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that Richard Walker made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $2,500 and alleges excess contributions by Mr. Walker totaling $1,500. As the attached Affidavit clearly states, the contributions noted by the Commission represented contributions by both Richard Walker and Jack Schulman and were intended to be allocated between the two of them and designated to the Mattingly campaign's primary and general election accounts.

The distribution of Mr. Walker's and Mr. Schulman's contributions, as specified in Mr. Walker's Affidavit, was within the permissible $1,000 limit per person per election pursuant to 2 U.S.C. § 441a(a). The letter to Richard Walker, attached to his Affidavit, demonstrates that he made individual efforts to notify the Mattingly campaign of the proper allocation of his contribution between himself and Mr. Schulman. Although Mr. Walker has been unable to locate a copy of his allocation letter to Friends of Mattingly, he states in his Affidavit that he followed the request made to him to instruct the Mattingly campaign in writing of the proper reporting of the contribution. Apparently, the

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Mattingly campaign disregarded his instructions when completing its FEC reports.

The burden of proper reporting, redesignation and refund of contributions, if required, fell squarely on the Mattingly campaign. Mr. Walker did all that could be expected by instructing the campaign to allocate the contribution between himself and Mr. Schulman and further designating his contribution between the general account and the retirement of the campaign's primary debt. Accordingly, I urge the General Counsel to recommend no probable cause to believe that Richard A. Walker violated the Act.

Sincerely,

Jan Witold Baran

rpb
cc: Mr. Richard A. Walker

2304351550 1

BEFORE THE FEDERAL ELECTION COMMISSION

County of Hillsborough)
) MUR 2989
State of Florida)

AFFIDAVIT OF RICHARD A. WALKER

Richard A. Walker, first being duly sworn, deposes and says:

1. I am Richard A. Walker. On September 18, 1986, I signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on my personal account (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for United States Senate, it was my intent that the amount represent a contribution of $1,250 from myself and a contribution of $1,250 from my co-worker, Jack Schulman. At that time, I owed Jack Schulman approximately $1,250 on a pre-existing debt. Jack Schulman and I agreed that I would write the check to Friends of Mattingly and make the contribution in both our names as complete payment of that debt, so that he could have his picture taken with President Reagan.

3. At the time we made the contribution, Jack Schulman and I indicated to Stanton Shapiro, who was coordinating the contributions on behalf of Friends of Mattingly, the proper allocation of the contribution. In return, I received a letter from Stanton Shapiro (copy

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attached hereto) confirming the allocation of the check. To the best of my memory, I complied with his instructions regarding the allocation form referenced in that letter. It was my understanding at the time that that action was sufficient to designate the allocation of the contribution equally between Jack Schulman and me.

4. I understood that there was a campaign debt from the primary election and that Jack Schulman and I could allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also my intent, contemporaneous with the making of that donation, that $250 of my contribution be allocated to the payment of that primary debt and that the remaining $1,000 of my donation be allocated toward Mattingly's general election campaign. As I remember, Jack Schulman made a similar request.

Richard A. Walker

State of FLORIDA)
County of HILLSBOROUGH) ss.

Subscribed to and sworn before me this 4 day of October, 1990.

Notary Public
NOTARY PUBLIC, STATE OF FLORIDA AT LARGE
MY COMMISSION EXPIRES SEPTEMBER 06, 1993

My Commission Expires: [illegible]

2304351-55503

RICHARD A. WALKER
BLDG. 3, SUITE 3
8313 W. HILLSBOROUGH AVE.
TAMPA, FL 33615

No. 198

September 18 86

63-27
631 201

Pay to the order of FRIENDS OF MATTINGLY $ 2,500.00

**Two Thousand five hundred dollars DOLLARS

NCNB National Bank
of Florida
Tampa, FL 33601

MEMO

Richard A. Walker

rec'd 10/1-/86 Robert Mann

930435155504

FILE

A. L. WILLIAMS & ASSOCIATES, INC.
3120 BRECKINRIDGE BOULEVARD
DULUTH, GEORGIA 30199-0001
404 381-1674

STANTON J. SHAPIRO
LEGAL COUNSEL

October 16, 1986

Mr. Richard A. Walker
Building 3, Suite 3
8313 W. Hillsborough Avenue
Tampa, Florida 33615

Dear Dick:

I understand that your check for $2,500.00 payable to Friends of Mattingly was a contribution from both you and Jack Schulman, to the extent of $1,250.00 each, with $1,000.00 of the $1,250.00 being contributed toward the general election campaign and $250.00 of the $500.00 being contributed toward the retirement of the primary election debt. If my understanding is not correct, please call me. Of course, Jack Schulman should have paid you $1,250.00.

In accordance with the above assumption, I have provided you with a letter that you and Jack Schulman should sign. After you sign it, send it to Jack. Then have Jack send the letter back to me and I will forward it to Friends of Mattingly. This letter will better reflect the intent of your contributions.

Very truly yours,

Stan Shapiro

Stanton J. Shapiro
Legal Counsel

SJS:kbj

enclosures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1990

Mr. John A. Conant
2902 Rivermeade Dr.
Atlanta, GA 30327

RE: MUR 2989
John A. Conant

Dear Mr. Conant:

We received your response dated July 31, 1990, concerning the Federal Election Commission's finding that there is reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). However, the Factual & Legal Analysis sent to you listed only the excessive contributions made by you to Mack Mattingly, a candidate for the U.S. Senate in 1986 in the Republican primary election in Georgia. Reports filed with the Commission by the Friends of Mattingly Committee show that you made the following contributions to Mack Mattingly's 1986 Senate campaign:

Date	Amount
6-9-82	$250
9-21-84	$1,000
4-8-85	$1,000
5-9-85	$1,000

If you wish to amend your response to include all of the above contributions, please do so within 15 days of your receipt of this letter.

In addition, in your response you indicated that you would like to settle this matter promptly. The quickest way to resolve this matter is through pre-probable cause 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). The Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to a respondent.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555 07

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1990

Mr. Carl Bolch, Jr.
P.O. Box 105035
Atlanta, GA 30348

RE: MUR 2989
Carl Bolch, Jr.

Dear Mr. Bolch:

We have received your response dated August 20, 1990, concerning the Federal Election Commission's finding that there is reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). However, the Factual & Legal Analysis sent to you listed only the excessive contributions made by you to Mack Mattingly, a candidate for the U.S. Senate in 1986 in the Republican primary in Georgia. Reports filed by the Friends of Mattingly Committee show that you made an additional contribution of $1,000 around November 22, 1983. If you wish to amend your response to include this contribution, please do so within 15 days of your receipt of this letter.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351550 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1990

Mr. John M. Stuckey, Jr.
1409 Peachtree St., N.E.
Atlanta, GA 30309

RE: MUR 2989
John M. Stuckey, Jr.

Dear Mr. Stuckey:

We received your response on October 9, 1990, concerning the Federal Election Commission's finding that there is reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). However, the Factual & Legal Analysis sent to you listed only the excessive contributions made by you to Mack Mattingly, a candidate for the U.S. Senate in 1986 in the Republican primary election in Georgia. Reports filed with the Commission by Friends of Mattingly show that you made an additional contribution of $1,000 around October 11, 1983. If you wish to amend your response to include this contribution, please do so within 15 days of your receipt of this letter.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons 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 ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 23, 1990

Mr. Charles B. West
3340 Peachtree Rd., N.E.
Atlanta, GA 30026

RE: MUR 2989
Charles B. West

Dear Mr. West:

We have received your response dated September 20, 1990, concerning the Federal Election Commission's finding that there is reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). However, the Factual & Legal Analysis sent to you listed only those contributions which resulted in excessive contributions to the general election campaign of Mack Mattingly, a candidate for U.S. Senate from Georgia in 1986. Reports filed with the Commission by the Friends of Mattingly committee show that you also made the following contributions:

5-18-85	$1,000
1-26-84	$1,000

If you wish to amend your response to include these contributions, please do so within 15 days of your receipt of this letter.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff persons assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

DOC 8310
ORIGINAL

DOW, LOHNES & ALBERTSON
ATTORNEYS AT LAW
1255 TWENTY-THIRD STREET
WASHINGTON, D. C. 20037

TELEPHONE (202) 857-2500

TELECOPIER (202) 857-2900
CABLE "DOWLA"
TELEX 425546

JOHN S. LOGAN
DIRECT DIAL NO.
857-2640

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 23 PM 1:07

October 22, 1990

90 OCT 22 PM 4:22

VIA HAND DELIVERY

Hon. John W. McGarry
Vice Chairman
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jeffrey Long, Esq.

Re: MUR 2989
Rankin Smith

Dear Vice Chairman McGarry:

This letter is in response to your letter of July 20, 1990, to Rankin Smith, regarding the above-referenced MUR.[1/] We have been designated as Mr. Smith's counsel in this matter. For the reasons set forth herein, we submit that no further action should be taken against Mr. Smith in this matter. As described below, Mr. Smith made the contributions described in the attachment to your letter in accordance with the requirements of the Federal Election Campaign Act of 1971 and the Commission's Rules.

The Factual and Legal Analysis (the "Analysis") appended to your letter argues that, in 1985, Mr. Smith made excessive contributions in the amount of $1,200 to Mack Mattingly's 1986 primary election campaign for the United States Senate. Although the Analysis does not show any other contributions to the 1986 Mattingly campaign, these contributions

---

1/ As noted in our letter of September 27, 1990 to Jeffrey Long of the Commission staff, your letter to Mr. Smith was misaddressed and, consequently, he did not receive it until long after it was mailed. We have since been granted an extension of time for the preparation of this response until October 22, 1990. Consequently, this response is timely filed.

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apparently were deemed to be excessive because Mr. Smith had made a $1,000 contribution to the Friends of Mattingly, Senator Mattingly's campaign committee, in 1983. The Analysis concluded that there is reason to believe that Mr. Smith's 1985 contributions violated 2 U.S.C. § 441a(a)(1)(A), which prohibits an individual from making contributions exceeding $1,000 to any one candidate for a single election.

Our investigation of this matters suggests that no violation took place. Mr. Smith did make contributions to Friends of Mattingly in 1983 and 1985: $1,000 on November 2, 1983; $200 on June 20, 1985; and $1,000 on July 18, 1985. However, as shown by the Commission's records and the affidavit of Mr. Smith, it would appear that these contributions were within the lawful limits placed on campaign contributions.

First, the Analysis implies that the 1983 contribution was made in connection with the 1986 primary. However, as explained in the Affidavit of Rankin Smith, attached hereto as Exhibit A, he made the contribution with the understanding that it was intended to pay debts of Senator Mattingly's previous campaign. Even if the Friends of Mattingly erroneously reported this contribution as intended for the 1986 election, that does not affect Mr. Smith's intentions at the time the contribution was made. Thus, the 1983 contribution should not be counted against Mr. Smith's 1986 limits.

Similarly, there is external evidence to show that Mr. Smith's July, 1985 contribution for $1,000 was designated for the 1986 general election, not the primary. The 1985 year-end report of Friends of Mattingly shows a contribution by Mr. Smith on July 18, 1985, the day he made the contribution, designated for the general election. A copy of that page of the report is attached hereto as Exhibit B. While the report shows the contribution in the amount of $800, not $1,000, it does provide contemporaneous evidence of the intentions of Mr. Smith when he made the contribution.[2/]

2/ While a record of a written designation would provide better evidence of Mr. Rankin's intentions at the time he made the contribution, the Commission's Rules did not require political committees to keep such records in 1985. Section 110.1(1) of the rules, which requires such record keeping, was not added to the rules until 1987. Compare 11 C.F.R. § 110.1 (1984) with 11 C.F.R. § 110.1 (1987). Until that time, treasurers were required only to file accurate reports. See 1 Fed. Elect. Camp.

(continued...)

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Taken together, this evidence shows a pattern of lawful contributions. Mr. Smith's first contribution was intended to pay campaign debts for 1980. His second, undesignated contribution, was for the 1986 primary. His third contribution, as reported by the Friends of Mattingly, was designated for the 1986 general election. These contributions, individually and collectively, are within the per-election limits established by 2 U.S.C. § 441a(a)(1)(A). There is, therefore, no basis for any further action by the Commission in this matter.

Although we believe there is no basis for further action against Mr. Smith, we remain willing to resolve this matter through the Commission's conciliation process. Consequently, we hereby request pre-probable cause conciliation pursuant to Section 111.18(d) of the Commission's Rules.

Please inform me if any questions should arise in regard to this matter.

Respectfully submitted,

John S. Logan

JSL/jgh
Attachments

9304351551 3

2/ (...continued)
Fin. Guide (CCH) ¶ 864 (Explanation and justification of Part 110).

Before the
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

In the matter of)
) MUR 2989
RANKIN SMITH)

AFFIDAVIT OF RANKIN SMITH

State of Atlanta)
) ss
Fulton County)

Rankin Smith, being first duly sworn under oath, deposes and says:

1. My name is Rankin Smith. I am submitting this affidavit in connection with the response to the finding of the Federal Election Committee ("FEC") that there is reason to believe I violated the Federal Election Campaign Act. This affidavit is based on my personal knowledge of the matters discussed herein.

2. I first became aware of the FEC proceeding in September, 1990, when I received a July 20, 1990 letter from John W. McGarry. Vice Chairman McGarry's letter was addressed to me at 707 Life of Georgia Building, Atlanta, Georgia. My correct address, set out in my Statement of Designation of Counsel, is 950 E. Paces Ferry Road, Suite 2930, Atlanta, Georgia.

3. I made three contributions to Friends of Mattingly, Senator Mack Mattingly's campaign committee. The first contribution was made by check dated November 2, 1983 in the amount of $1,000. The second contribution was made by bank draft dated June 20, 1985 in the amount of $200. The final

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contribution was made by check dated July 18, 1985 in the amount of $1,000. I made no other contributions to Friends of Mattingly.

4. The November 2, 1983 contribution was made in response to a request for contributions to repay campaign debts remaining from Senator Mattingly's 1980 campaign. I have no recollection of my intended designations of the contributions made in 1985. I am, however, a frequent contributor to federal campaigns, and I make every effort to assure that I do not exceed contribution limits. This leads me to believe that it is unlikely I made these contributions in such a way as to exceed the limits set by federal law.

The foregoing is true and accurate to the best of my knowledge, information and belief.

Rankin Smith

Subscribed and sworn before me
this 17th day of October, 1990

Notary Public

My commission expires: 6-14-93

2304351551 5

OGC 837

WILEY, REIN & FIELDING

1776 K STREET, N.W.
WASHINGTON, D.C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

October 22, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 OCT 24 PM 2:22

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

ATTN: Elizabeth Campbell, Esq.

Re: MUR 2989 (Murray)

Dear Mr. Noble:

Please find enclosed the Affidavits of R. Danny Murray and his wife, Janice C. Murray, and attached documentation. These materials are provided to the Commission in Response to the Commission's Notice of Reason to Believe addressed to Mr. Murray in Matter Under Review (MUR) 2989.

The FEC's complaint alleges that R. Danny Murray made contributions to the 1986 general election campaign account of Friends of Mattingly totaling $3,475 and alleges excess contributions by Mr. Murray totaling $2,475. As the attached Affidavits clearly state, the contributions noted by the Commission were from Danny and Janice Murray's joint checking account and represent contributions from both Mr. & Mrs. Murray, to be allocated between the two of them and designated to the Mattingly campaign's primary and general election accounts.

Moreover, the allocation letter signed by Danny Murray (and attached to his Affidavit) demonstrates that at the time the $2,500 contribution was made in 1986, he made an individual effort to assure that his wife's and his own contributions were properly reported to the Mattingly campaign and were within permissible limits of the law. The Murrays received representations that the Mattingly campaign did indeed have a primary debt. The burden of proper reporting, redesignation and refund of the contribution, if required, fell squarely on the Mattingly campaign.

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I. Inaccurate Reporting

This matter is complicated by the fact that the Mattingly Committee allocated and reported the Murrays' contributions without regard to the allocation letter from the Murrays. Although the allocations disclosed in the FEC's records reflect contributions entirely within the Murrays' individual contribution limits, the reports do not reflect the allocation requested by the Murrays as relayed to the Mattingly campaign, nor do the reports reflect the order in which the contributions were issued. (The relevant pages of the 1986 Friends of Mattingly October quarterly and pre-general reports are attached hereto).

Three checks were issued from the Murrays' joint account. The first for $2,500 on September 16, 1986; the second for $600 on September 22, 1986; and the third for $375 on October 1, 1986. While the original check for $2,500 was to be allocated as follows (pursuant to the Murrays' allocation letter) Danny A. Murray - $1,000 general account, $250 primary account, Janice C. Murray - $1,000 general account, $250 primary account, the campaign appears to have first allocated the September 22 contribution of $600 entirely to Danny Murray. Thus, when the campaign later went to report the earlier $2,500 check, it was prevented from allocating that contribution according to the Murrays' instructions without violating the permissible contribution limits. This same problem occurred with regard to the $375 contribution issued on October 1, 1990. Reporting the contributions in this manner resulted in an inequitable distribution of the Murrays' contributions so that $2,000 in total was reported as being from Mr. Murray and $1,475 in total was reported as being from Mrs. Murray. As shown below, these amounts are inconsistent with the Murrays' stated allocations.

II. Correct Allocation

Although the allocation assigned to these contributions by the Mattingly Committee is completely within the permissible individual limits of 2 U.S.C. § 441a, the Mattingly campaign reports fail to reflect the allocation intended by the Murrays. All checks from the Murrays' joint account should have been divided equally between Danny and Janice Murray and allocated as follows:

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9/16/86	R. Danny Murray	$1,000	general account
		$250	primary account
	Janice C. Murray	$1,000	general account
		$250	primary account
9/22/86	R. Danny Murray	$300	primary account
	Janice C. Murray	$300	primary account
10/1/86	R. Danny Murray	$187.50	primary account
	Janice C. Murray	$187.50	primary account

If properly allocated as indicated above, the resulting contributions would have been $1,000 to the general campaign and $737.50 to the primary campaign for debt retirement for both Danny Murray and Janice Murray. The Murrays should not be held accountable for the failure of the Mattingly campaign to follow their instructions, especially because the campaign did not contact them further or refund the contributions.

Conclusion

Both the allocation assigned by Friends of Mattingly and the allocation intended by the Murrays are within the permissible limits of the law. This matter results from misreporting by the campaign, but not from any excessive contributions. Accordingly, I urge the General Counsel to recommend no probable cause to believe that R. Danny Murray violated the Act.

Sincerely,

Jan Witold Baran

By: Trevor Potter

rpb
cc: Mr. and Mrs. R. Danny Murray

2304351551 8

BEFORE THE FEDERAL ELECTION COMMISSION

County of Gwinnett)
) MUR 2989
State of Georgia)

AFFIDAVIT OF R. DANNY MURRAY

R. Danny Murray, first being duly sworn, deposes and says:

1. I am R. Danny Murray. On September 16, 1986, I signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my wife, Janice C. Murray and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my wife, resulting in a contribution of $1,250 from myself and $1,250 from my wife.

3. Shortly thereafter, I signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between my wife and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My wife and I understood that there was a campaign debt from the primary election and that we could

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allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my wife's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contributions were made, I signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my wife and me between the campaign's primary and general election accounts.

6. In addition, the Federal Election Commission complaint indicates that I wrote two other checks payable to Friends of Mattingly for $600 and $375 respectively. I have been unable to locate copies of these checks, but I do remember writing these checks to purchase tickets to a Mattingly fundraiser which I distributed to my employees. I have no recollection of expressly indicating to the Mattingly committee how these contributions should be designated between my wife and me or how the amounts should be allocated between the primary and general election campaigns. I assumed that the Mattingly committee would properly allocate

23043515520

these contributions to ensure my wife and I had not exceeded the permissible limits, or that alternatively, the committee would return any excess portions of those contributions to me.

R. Danny Murray

State of Georgia)
County of Gwinnett) ss.

Subscribed to and sworn before me this 3rd day of September, 1990.

Notary Public

Notary Public, Gwinnett County, Georgia
My Commission Expires July 26, 1994

My Commission Expires:

2304351552

BEFORE THE FEDERAL ELECTION COMMISSION

County of Gwinnett)
) MUR 2989
State of Georgia)

AFFIDAVIT OF JANICE C. MURRAY

Janice C. Murray, first being duly sworn, deposes and says:

1. I am Janice C. Murray. On September 16, 1986, my husband, R. Danny Murray, signed a check payable to Friends of Mattingly for the amount of $2,500 drawn on a joint account of my husband and myself (copy of check attached hereto).

2. Contemporaneously with the giving of that contribution to the Mattingly campaign for the United States Senate, it was my intent that the amount be jointly given with my husband, resulting in a contribution of $1,250 from myself and $1,250 from my husband.

3. Shortly thereafter, my husband signed a letter to the Mattingly campaign (copy attached hereto) indicating that the contribution was to be equally divided between him and me. It was our understanding at the time that that action was sufficient to designate the allocation of the contribution from our joint checking account equally between the two of us.

4. My husband and I understood that there was a campaign debt from the primary election and that we could

9304351552 2

allocate our contributions between the general campaign and the payment of the primary debt. Based on that understanding, it was therefore also our intent, contemporaneous with the making of that donation, that $250 of my contribution and $250 of my husband's contribution be allocated to the payment of that primary debt and that the remaining $1,000 of each of our donations be allocated toward Mattingly's general election campaign.

5. As evidence of our intent to allocate the contributions between the primary and general campaigns at the time the contributions were made, my husband signed the above-referenced letter to the Mattingly campaign which indicated the appropriate allocation of the contributions from my husband and me between the campaign's primary and general election accounts.

Janice C. Murray
Janice C. Murray

9304355-55523

State of Georgia)
County of Gwinnett) ss.

Subscribed to and sworn before me this 30th day of September, 1990.

Cynthia H. Nash
Notary Public

Notary Public, Gwinnett County, Georgia
My Commission Expires July 25, 1994

My Commission Expires: _____

Mr. Robert Mason
Finance Director
Friends of Mattingly
P.O. Box 1986
Atlanta, Georgia 30301-1986

Dear Bob:

As you are aware, my wife and I have purchased "photo op" tickets for the upcoming Mattingly Rally. Please let this letter confirm my understanding that the contribution for the photo op to the extent of $1,000.00 for myself and $1,000.00 for my wife constitutes a contribution to Friends of Mattingly for use in the general election. I further understand that the campaign has an outstanding primary debt; toward the retirement of that primary debt I have contributed $250.00 and my wife $250.00.

Although for my convenience I have only provided you with one check for the combined amount, I did want to clarify my understanding.

Please advise me if my understanding is contrary to the facts.

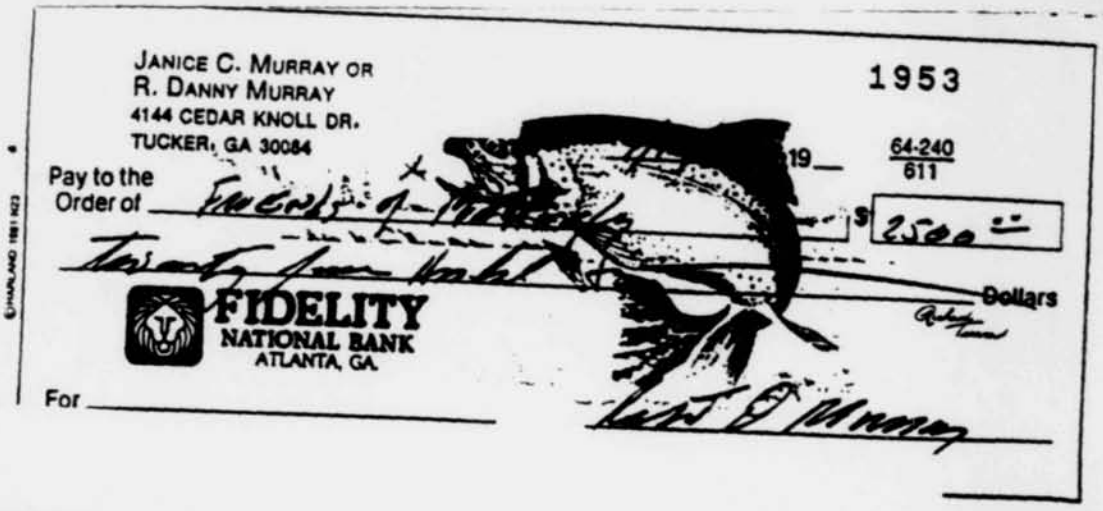
Sincerely,

Date: 10/9/86

Danny Murray
Danny Murray
Robert Mason

rcd 10/12/86

9304351552 4



Date Contribution Was Made	Date Contribution Was Recorded	Amount of Contribution	Intended Allocation			Allocation in Mattingly Report		
Sept. 22	Sept. 22	$600	$300 $300	Danny Murray Janice Murray	(Primary) (Primary)	$600	Danny Murray	(General)
Oct. 1	Oct. 1	$375	$187.50 $187.50	Danny Murray Janice Murray	(Primary) (Primary)	$375	Danny Murray	(General)
Sept. 16	Oct. 14	$2,500	$250 $250 $1,000 $1,000	Danny Murray Janice Murray Danny Murray Janice Murray	(Primary) (Primary) (General) (General)	$1,000 $475 $25 $1,000	Danny Murray Janice Murray Danny Murray Janice Murray	(Primary) (Primary) (General) (General)

9 3 0 4 3 5 1 5 5 2 5

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
90 OCT 17 AM 11:13

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	**SENSITIVE**
	)	
Friends of Mattingly and	)	
Donald P. Gammon, as treasurer	)	MUR 2989
74 Individuals	)	
17 Political Committees	)	
55 Corporations	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 19, 1990, the Commission found reason to believe Friends of Mattingly ("the Mattingly Committee") and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), and 441b(a), and 11 C.F.R. § 110.6(c)(3). The Commission granted the Mattingly Committee an extension of time to respond until August 31, 1990. On the same date the Commission also found reason to believe 72 individuals had violated 2 U.S.C. § 441a(a)(1)(A), 17 political committees had violated 2 U.S.C. § 441a(a), and 55 corporations had violated 2 U.S.C. § 441b(a). On August 3, 1990, the Commission found reason to believe two additional individuals violated 2 U.S.C. § 441a(a)(1)(A).

This report covers three individuals and a number of the "corporate" respondents where action can be taken at this time.

II. LEGAL AND FACTUAL ANALYSIS

A. Individuals

1. Deceased

The responses on behalf of two individual respondents state that they are deceased. The Citizens and Southern Trust Company responded on behalf of A. T. Kennedy and noted that he had died on September 20, 1985. The bank is one of the executors of the

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estate. Attachment 1. Counsel for Albert L. Luce, Jr., in responding on behalf of Mr. Luce, noted in his letter that George E. Luce, a brother and also a respondent in this matter, had died on July 5, 1990. A further response confirming this was received on August 29 from George Luce's son-in-law. Attachment 2.

Therefore, this Office recommends that the Commission take no further action with respect to A. T. Kennedy and George E. Luce and close the file with respect to these respondents.

2. **Incapacitated**

On July 30, 1990, J. Barnett Woodruff, a respondent in this matter, filed a response on behalf of his sister Emily Woodruff, who is also a respondent.

Therefore, this Office recommends that the Commission take no further action with respect to Emily Woodruff and close the file as it pertains to her.[1]

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1. In a subsequent response on August 3, Mr. Woodruff notes that in December 1988, he received a letter from the Mattingly Committee regarding Emily Woodruff's $1,050 in excessive contributions for the primary. This letter was evidently sent while the audit was in progress. It asks the contributor to indicate how he or she wanted the excess contribution to be "listed." In response, Mr. Woodruff's sons agreed to have the contribution listed in their names. Mr. Woodruff states in his July 30 response that he had power of attorney for his sister and was handling her business affairs in 1988. This Office does not consider this effort to be a proper reattribution of Emily Woodruff's contributions. Instead, the letter from the Mattingly Committee could be construed as its soliciting persons to, in effect, make contributions in the names of others. While this factor may bear on the findings with respect to the Mattingly Committee, it does not alter our view that no further action should be taken with respect to Emily Woodruff because of her present incapacity.

B. Corporations

1. Cashier's Check

The Commission found reason to believe Brown Brothers Harriman & Co. ("Brown Brothers") violated 2 U.S.C. § 441b on the basis of a cashier's check written on its accounts and made payable to Matt Mattingly for Senate in the amount of $1,000. Brown Brothers has presented evidence that it did not make the $1,000 contribution. In its response, it states:

> Brown Brothers Harriman & Co. is a licensed Private Bank and in the ordinary course of business it issues Cashier's Checks for its clients at their request. The contribution of $1,000 made to "Matt Mattingly for Senate" was in the form of a Cashier's Check that we issued, as a bank, to our client, J. M. Ireland, who in turn made the contribution. The Cashier's Check was issued persuant [sic] to her instructions on 6/5/86 and the $1,000 was debited to her principal account as indicated on the Cashier's Check.

A copy of the subject cashier's check does carry the notation that payment was ordered by J. M. Ireland "Principal AC Personal Funds." It has a "Friends of Mattingly" endorsement on the back. Attachment 4. Commission regulations recognize that contributions may be made by "check, money order, or other written instrument." 11 C.F.R. § 104.8(c). Therefore, it appears the use of a cashier's check from a private bank to make a contribution to a federal candidate is permitted. Thus, the evidence shows that Brown Brothers did not make a contribution to the Mattingly Committee.

Accordingly, this Office will prepare a brief recommending no probable cause on 2 U.S.C. § 441b with respect to Brown Brothers Harriman & Co.

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2. Returned Checks

According to the Audit Division, the Mattingly Committee's contribution check copies, beginning in June 1985, were numbered consecutively from one to more than 20,000, apparently in order of receipt. However, the Committee's deposit slips were not in any way associated with the numbers on the contribution check copies, and the auditors could not verify what checks made up a deposit. The Committee told them that it thought the corporate contribution checks it received had been returned, not deposited. Nevertheless, due to the condition of the Committee's records, the auditors could not confirm whether copies of corporate checks received by the Mattingly Committee were actually deposited. Therefore, it included such contributions in its referral. As expected, the responses from several corporate entities confirm that their checks were returned, not deposited, by the Mattingly Committee.

Century 21 Cook Realty, Inc. responded with a copy of the voided check for $125 dated May 24, 1985, made payable to "Georgia Tribute to the President." Yvonne Otts, broker/owner of the respondent, also provided a copy of her personal check for $125 dated May 31, 1985. Attachment 5. Thus, it appears the corporate check was returned and replaced with a personal check.

Century 21 of the Southeast, Inc., responded by noting that while it had been unable to find a copy of the check, it had been able to determine that it had never been cashed and the check had been voided. In support, counsel produced a copy of an internal document listing the May 22, 1985, check (#30379) as outstanding

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on August 12, 1985, and another document indicating it had been voided. A copy of the September 25, 1985, listing of outstanding checks no longer includes #30379, thus, in counsel's view, indicating the voiding had occurred. Counsel also discusses how a check made payable to "Georgia Tribute to the President" found its way to the Friends of Mattingly Committee.[2] Attachment 6.

The Lex Jolley & Co., Inc., responded by noting that it is a small, family-owned company. Among the Mattingly Committee records was a check dated November 12, 1985, from the Lex Jolley & Co., Inc., for $500 payable to Friends of Mattingly. Malinda J. Mortin, secretary/treasurer, states in a letter:

> On November 12, 1985, I sent a corporate check for what was a personal contribution. Unfortunately, I did not think about the connection that would be made between a corporate check and the Federal Campaign Finance Law, but Senator Mattingly's campaign staff realized that the check was a corporate check and returned it on November 26, 1985. Since all of this happened in the month of November, 1985 before I closed my books for the month, this check was never credited to a personal account on our books, but the check was simply voided as shown on the attached copy.

In addition to a copy of the voided check, Ms. Mortin also included a copy of the letter dated November 26, 1985, from the Mattingly Committee returning the check. Attachment 7.

The audit also located a check dated December 2, 1985, for $500 on an account of Oral and Maxillofacial Surgery Associates and signed by Dr. J. David Allen along with a response item

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2. Other contributors who made checks to the Georgia Tribute to the President in 1985 have also claimed they did not realize the funds would go or actually went to the Mattingly Committee. After receiving and reviewing the Mattingly Committee's response, this Office will consider whether further inquiry regarding this event is warranted.

addressed to the Mack Mattingly Senate Club. In response, Beverly Allen, business manager, enclosed a photocopy of the check that had been voided. She notes that "the check was never processed, but, rather, was returned to us unused." She adds that the check was voided and no endorsement was made on it. She states that apparently "the financial advisor to the campaign caught our (unintended) error, since we were not fully informed as to the differences in the Georgia laws versus the federal laws at that time." Attachment 8.

Also among the Mattingly Committee records was a check dated November 15, 1985, for $250 payable to Friends of Mattingly and drawn on an account of The Pinkerton and Laws Company. In response, J. P. Cranmer, senior vice president, notes that the company "found that a check had been process [sic] through our accounting system, but subsequently was voided." A copy of the voided check was attached.[3] He further notes that "[a]fter a diligent search of our accounting records, we can find no instance of any contribution in connection with the election campaign of Mack Mattingly or any other candidate for public office." Attachment 9.

These respondents have each produced statements and documents to support their claim that the corporate checks were returned and voided. Therefore, this Office recommends that the Commission take no further action with respect to Century 21 Cook

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3. The copy of the check does not reproduce clearly. Nevertheless, an examination of the copy indicates it is the same check noted during the audit.

Realty, Inc.; Century 21 of the Southeast, Inc.; Lex Jolley & Co., Inc.; Oral and Maxillofacial Surgery Associates; and The Pinkerton and Laws Company and close the file as it pertains to these respondents.[4]

3. Not Incorporated or Not a Corporate Account

As part of its review, the Audit Division sought to verify the corporate status of apparent corporate contributors with the Georgia Secretary of State or similar offices in other states. Several of these respondents have submitted statements to the effect that they were or are not incorporated or that the check was not drawn on a corporate account.

The Mattingly Committee records included two checks on the account of Collins Brothers of Vienna, Georgia. One check for $100 dated July 26, 1985, and another check for $25 dated June 27, 1986, were made payable to Friends of Mattingly. In response, Larry Collins, a partner of Collins Brothers Farms, stated that "Collins Brothers is a general partnership and not a

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4. Although this Office will recommend that the Commission find no probable cause to believe that Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a), we are recommending no further action against these other respondents because of the difference in the weight of the evidence obtained by this Office. In the Brown Brothers Harriman & Co. situation, the documentary evidence clearly indicates that there was no corporate contribution. The Audit Division agrees that the documentary evidence shows that there was no corporate contribution by Brown Brothers Harriman & Co.

However, with respect to the respondents in this section, this Office is accepting the statements provided in the responses as accurate, rather than expending more of the Commission's resources to verify each response. But because of the circumstances surrounding these particular contributions such as their size, and the fact that it appears they were returned, this Office believes that the Commission should take no further action against these respondents.

corporation." He notes that there is a Collins Bros., Inc. located around Atlanta, but that there is no connection with Collins Brothers of Vienna. Attachment 10. When the Audit Division contacted the Georgia Secretary of State, they were told that there is a "Collins Brothers Corporation" in Georgia.

The records also contained two checks drawn on an account in the name of J. R. "Jimmy" Curry d/b/a Curry Farm Supply in Shellman, Georgia. One check for $100 dated August 13,, 1985, and another for $50 dated April 3, 1986, were made payable to Friends of Mattingly. A response from Eddie E. Arnold, Jr., a certified public accountant in Cuthbert, Georgia, states that he does the accounting and income tax work for J. R. Curry, Jr., d/b/a/ Curry Farm Supply. He states:

> The political contribution mentioned in your letter was a personal contribution made by J. R. Curry, Jr. using a Curry Farm Supply check. Curry Farm Supply is [a] sole proprietorship operated by Mr. Curry and reported for income tax purposes on Schedule "C" of his individual form 1040. Curry Farm Supply is not a corporation. You should be able to verify this fact from his federal I.D. number
>
> We do not understand how the Georgia Secretary of State office could have verified the corporate status of Curry Farm Supply unless they got the name confused with a different business, Curry Farms, Inc.

Attachment 11.

The audit discovered among the Mattingly Committee records a check for $150 dated February 13, 1986, drawn on an account in the name of J & W Farms of Glennville, Georgia, and made payable to "Friends of Mac Mattingly." In response, we received a letter from Wayne Durrence that states: "I am informing you that J & W FARMS is not now and has never been registered as a corporate

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entity." Attachment 12.

Among the Mattingly Committee records was a copy of a check for $200 dated October 23, 1986, drawn on an account in the name of Pacelli High School in Columbus, Georgia, and made payable to Friends of Mattingly. Copied with the check was a note on the letterhead of J. Barnett Woodruff indicating that "these" would allow three individuals to visit with the President. In response, Sylvia A. Meares, office manager, states that the check was for two tickets to a presidential breakfast to permit a student and a teacher to attend. Attached to her response are two documents for the request and disbursement of this check that support her statement. She notes that "Pacelli's participation in this event was not in support of any candidate or either party." More importantly, she notes: "Pacelli High School is not a corporation. We operate under the auspices of the Catholic Diocese of Savannah and all property is owned by the Diocese." She adds that there may have been some confusion with Pacelli Education Foundation, Inc. or that Pacelli Home and School Association may have submitted an application for incorporation around that time. Attachment 13.

The Mattingly Committee records also included a copy of a check for $285 dated September 16, 1986, drawn on an account in the name of Reeves, Avary Associates and made payable to Friends of Mattingly. The check also contains the handwritten name and address of Robert F. Reeves and the notation "19 tickets" in the memo line. In response, Robert F. Reeves states:

> Reeves, Avary Associates, Inc. had been a corporation made up of myself and a partner to provide management

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> consulting services to companies wishing to improve their productivity. However, our business effort was not successful, and the corporation was dissolved in 1985 and the Georgia Secretary of State's office was notified.

He adds that in 1985 he became a full time contractor associated with A. L. Williams under the name Robert F. Reeves d/b/a/ Reeves, Avary Associates. He states that Reeves, Avary was no longer a corporation but a doing business as name only. He adds that in 1986 the A L. Williams organization supported a fundraising rally for Mack Mattingly at the Omni complex in Atlanta. He states that as a regional vice president "I had to purchase the tickets for all the people in my down line organization." Because he viewed this as a personal business expense, he says he paid for the tickets with a check from "my personal business account." He reiterates that Reeves, Avary was not a corporation at that time. Attachment 14.

The Mattingly Committee records contained a copy of a check for $250 dated November 11, 1985, and drawn on an account in the name of Whilom L. Reno and Associates of Statesboro, Georgia. Francis C. Long, an accountant for William L. Reno, responded by noting that while Mr. Reno is the sole shareholder of a corporation called William J. Reno and Associates, Inc., the contribution did come from a corporate bank account. Instead, Mr. Long states that Mr. Reno also operates a real estate agency known as "Mr. William J. Reno, d/b/a William J. Reno and Associates." Mr. Long states that the contribution to the Mattingly Committee "was made by Mr. Reno personally." He says the check "was drawn on a personal account of Mr. Reno's" and

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"did not come from a corporation." Attachment 15.

The Mattingly Committee records also included a check for $250 dated June 10, 1985, drawn on an account in the name of Riverside Development of Macon, Georgia, and made payable to Friends of Mattingly. The name "Charles H. Jones" was handwritten on the check. Mr. Jones responded on the letterhead of Ocmulgee Fields, Inc., of Macon and included a letter from his accountant, Roy W. Wyche. Mr. Wyche states in his letter to Mr. Jones that he has been Mr. Jones' accountant and tax advisor for over 33 years. He further states:

> Riverside Developments is not now a corporation and never has been since you adopted the name as a "trade name" over 25 years ago.
>
> The name is used for a bank account to account for all of your personal business income and expenses. ... In addition, you pay charitable contributions, property taxes, life insurance premiums and some personal non-business expenditures through this account.

Mr. Wyche further notes that the IRS has reviewed this account and accepted it as a personal operating account. He then adds that if the Georgia Secretary of State's office has a record of a corporation named Riverside Developments, it must belong to someone else. He again emphasizes that Riverside Developments is merely a trade name. Attachment 16.

The Mattingly Committee also reported a $500 contribution from Bill Taylor & Associates of Jacksonville, Florida. William M. Taylor filed a response that enclosed a copy of a check for $500 dated February 19, 1985, drawn on an account in the name of Bill Taylor and Associates of Jacksonville, Florida. In his letter, Mr. Taylor states that there "appears to be some

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confusion abut the account on which Bill Taylor, an individual, made a contribution to the Friends of Mattingly in connection with the 1986 Senate Election." He states that the account on which the check was drawn "is clearly a personal account and has always been." He says that when he incorporated in 1983, the corporate account had "Inc." added. He enclosed a copy of corporate check which carries a different account number than the check used to make the contribution. Attachment 17.

The reports of the Mattingly Committee included an entry for a $500 contribution from Willis and Veenstra Investment Company. In response on The Willis Group, Inc., letterhead, Lynwood G. Willis stated: "Willis and Veenstra Investment Company is not a Florida Corporation. It is a General Partnership that was formed on August 3, 1973, and is still in existence." He attached a copy of the contribution check for $500 dated February 15, 1985, on an account in the name of Willis and Veenstra Investment Co. in Jacksonville, Florida, and made payable to Friends of Mattingly. He also included a copy of the executed partnership agreement for Willis and Veenstra Investment Company dated August 3, 1973. The agreement states that the Willis and Veenstra Investment Company is not incorporated. Mr. Willis does note that there is a Willis and Veenstra Investment Co., Inc., that is a Florida corporation. But he states that "it has never been utilized nor has it even had a bank account." Attachment 18.

In view of the statements and information submitted by these respondents, this Office recommends that the Commission take no further action with respect to Collins Brothers, Curry Farm

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Supply, J & W Farms, Pacelli High School, Reeves, Avary Associates, William J. Reno and Associates, Riverside Development, Bill Taylor & Associates, and Willis and Veenstra Investment Company and close the file as it pertains to these respondents.

4. Charged to Individual

Several responses indicate that although the check may have been drawn on a corporate account, it was charged to an individual as a personal expense.

The audit located a check for $150 dated October 23, 1986, drawn on an account in the name of Dr. John C. Adams Jr., P.C. in Statesboro, Georgia, and made payable to Friends of Mattingly. In response Edwin G. Hill, the accountant for Dr. Adams, stated that the "political contribution in question for the year ended December 31, 1986, was not in any way taken as a credit or as a deduction on the tax return for the corporation." He states that this "check was written on the corporate account because no personal account existed for Dr. John C. Adams, Jr." He adds that the "check upon being written was then treated as a personal expense and added to the corporate shareholder's receivable account." He notes that this account is periodically reimbursed by Dr. Adams and that the contribution "was solely a personal expenditure." He enclosed copies of the corporation's and Dr. Adams' tax returns for 1986 to show that no corporate deduction was taken for the contribution but that Dr. and Mrs. Adams took a $100 deduction for a political contribution. Attachment 19.

The audit located a check from Dixie Trucking Company dated

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May 17, 1985, for $250 payable to Friends of Mattingly. In response Marie L. Massey, manager, states that "the first check for this contribution was returned by the Mattingly campaign because of being a corporate contribution. This was replaced by a check which was in turn charged to three of the corporate officers." She identifies these officers as F. M. Fairman, John A. Stubbs, and Carl G. Prendergast. The copy of the May 17, 1985, check has the names Mike Fairman and John Stubbs in the memo line. She further states that on September 30, 1986, a portion of the assets of Dixie Trucking Company was sold to an individual, who is now operating Dixie as an individual, since he did not buy the corporation. Attachment 20.

The Mattingly Committee records also included a copy of a check for $150 dated October 24, 1986, drawn on an account in the name of Maricom Electronics, Inc., of Savannah, Georgia, and made payable to Friends of Mack Mattingly. In response, Bill Willingham, president, states that "a Maricom Electronics, Inc. check was used to made a contribution of $150.00 to Matt Mattinglys [sic] Senatorial Campaign." He states that he is president of the corporation and "this amount of money was to have been charged to my personal account." He adds that he has instructed his accountant to check and be sure this was done. He further notes that the corporation is controlled by five equal partners and that they have never supported or made a contribution to any political party or candidate. Attachment 21.

Also included in the records of the Mattingly Committee was a check for $200 dated May 31, 1985, drawn on an account in the

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name of Bill Walker and Associates of St. Simons Island, Georgia, and made payable to Mack Mattingly Re-election Campaign along with a response item with the name of William Q. Walker on it. The records also contained a check for $100 dated February 19, 1986, drawn on an account of Bill Walker and Associates at a different bank and made payable to Mack Mattingly Friends along with a response item. It also contains a handwritten notation "personal account" next to the account holder's name. In response, William Q. Walker, Jr., president, states that "Bill Walker & Associates is a 100% wholly owned corporation owned by myself."

He adds that the business was originally a proprietorship "using my only personal checking account for business purposes." He said it was later changed into a corporation and the checking account "was then placed into the corporate use before I opened a personal account." He said he thought his wife's account was sufficient for general household purposes, but discovered that he was issuing corporate checks and "charging my personal reimbursement account within corporate books." As he saw his personal check writing becoming more than he had predicted, he then opened a personal account but "not before this incident, however." He states that the corporation's practice regarding personal bills paid from the corporate account was to "reimburse the corporation from my personal account for any corporate checks written for personal expenses." He adds that "the contributions in question were charged directly to my personal account and were paid for by myself in after tax dollars." He continues that he

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was not fully aware of the details about how contributions to federal candidates should be made and any errors he made were "inadvertent and unintentional." His statement purports to be sworn to. Attachment 22.

The Commission has previously recognized that contributions made for nonrepayable drawing accounts are permissible under the Act. See Advisory Opinion 1978-42. A published notice on this question states:

> The Commission distinguishes among three types of corporate accounts used by employees: 1) repayable drawing accounts, 2) non-repayable drawing accounts and, 3) expense accounts. Contributions made from drawing accounts that the employee is responsible to repay will be considered corporate contributions for the outstanding period of the draw, however, contributions made from non-repayable drawing accounts established to permit personal draws against salary, profits or commissions will be considered personal contributions. Contributions written against standard expense accounts are prohibited as corporate contributions.

See 2 Fed. Election Camp. Fin. Guide (CCH) ¶ 9064 (1978).

The descriptions of the corporate accounts given in these responses appear to refer to repayable accounts rather than nonrepayable drawing accounts, although the information presently available leaves some uncertainty. Nevertheless, we note that the amounts in question range from only $150 to $300 and that all of these contributions were apparently charged to individuals personally for tax purposes.

Therefore, this Office recommends that the Commission take no further action with respect to Dr. John C. Adams, Jr., P.C.; Dixie Trucking Company; Maricom Electronics, Inc.; and Bill Walker & Associates and close the file as it pertains to these

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respondents.

5. Other Circumstances

Five other corporate respondents involve contributions ranging from $150 to $300.

A check for $250 dated December 5, 1985, drawn on an account in the name of Avail-Ability Inc. of Lithia Springs, Georgia, was among those reviewed by the audit. The check is made payable to Freddi S. Hagin, who is also the signatory on the check, and is noted as "personal salary" on the memo line. In response, Ms. Hagin states:

> I have no recollection of this matter which you alledge [sic] to have occurred in 1986, and unfortunately my records are not readily accessible from for this period of time; however, I would ask the Commission's favorable consideration towards me in this matter since the alledged [sic] action was done out of ignorance rather than malice. Since I do not remember the specific contribution, there is little I can offer by way of explanation. I can assure you, however, that it was not my intent to violate the law.

She also questions why the Mattingly campaign did not return the check and request a personal one. Attachment 23.

The Bibb Distributing Company also made a contribution to the Mattingly Committee of $250 in a check dated June 14, 1985, drawn on a company account with the name "Winburn E. Stewart Jr., Pres." written across the top. In response, Robert M. Nicholson, comptroller and secretary, states that the company "does not contest" that it made this contribution, which he says was "given to Matt Mattingly." He adds that in 1986, Winburn E. Stewart, Jr., bought out his father's ownership of the company. Attachment 24.

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The Mattingly Committee records also included a check for $150 dated October 1, 1986, drawn on an account in the name of Cathedral of Faith Church of God in Christ Executive Fund in Atlanta, Georgia, and made payable to Friends of Mattingly Committee. It was signed by Jonathan Greer and included a contributor information card with his name. The memo line of the check states "One Reservation/Georgia Victory." In response, Pastor Greer acknowledges that the church made a contribution to the campaign but without any intent to violate the law. He states:

> As best as we can remember, we were approached by the Mattingly Campaign Office to solicit volunteers to help in his campaign in Southwest Atlanta. The volunteers' task were to distribute campaign literature and receive donations from persons who wish to contribute. There contributions totaled $150.00 and were freely given by the general public. As a result, one check was given as the donations were cash in various denominations of money.

He asks that the Commission "forgive us for this oversight." Attachment 25.

A $300 check dated April 3, 1986, drawn on an account in the name of Gary Cooper Construction Account Flintside Subdivision in Albany, Georgia, and made payable to Friends of Mattingly Committee was also among the records reviewed by the audit. There was also a contributor information card identifying Gary and Sissy Cooper as the contributors. In response, Gary Cooper states that he was unaware this contribution violated the Act. He says he was solicited by the Mattingly campaign manager for Albany. He proffers no defense other than ignorance of the Act. He further notes that after contacting this Office he had lunch

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with Rep. Charles Hatcher, who told him that the candidate should have returned the check and that the responsibility lies with the candidate. Attachment 26.

The Mattingly Committee records also contained a check for $250 dated May 24, 1985, drawn on an account in the name of Vaughn Lumber Company of Forsyth, Georgia, and made payable to Georgia Tribute to the President. The memo line indicates it was a donation by A. Lee Vaughn. In response, A. Lee Vaughn states that after receiving the notification letter in this matter, "and locating this old check, I note that it was endorsed by Friends of Mattingly." He adds that "it is hard to remember that far back, but to the best of my knowledge, at the time I wrote the check, I thought it was going toward some programs of the President, not to Mack Mattingly." Attachment 27.

Based on the relative small amounts involved and the other noted circumstances, this Office recommends that the Commission take no further action with respect to Avail-Ability, Inc.; Bibb Distributing Company; Cathedral of Faith Church of God in Christ; Gary Cooper Construction; and Vaughn Lumber Company and close the file as it pertains to these respondents.

6. Preprobable Cause Conciliation

Three corporate respondents have requested preprobable cause conciliation.

The Mattingly Committee records had a copy of a check for $250 dated April 25, 1985, drawn on an account in the name of Fesperman Insurance Company of Waycross, Georgia, signed by Sandy Smart, and made payable to Friends of Mattingly. It was

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accompanied with a response item in the form of a membership enrollment form in the Mack Mattingly Senate Club from Tommy Fesperman, an insurance agent. In response counsel for Fesperman Insurance Company enclosed an affidavit from George T. Fesperman, Jr., president, that states the company did make such a contribution. He adds that until recently neither he nor the company knew such a contribution was illegal and that he has never made a contribution in the past. Counsel stresses that Mr. Fesperman did not have any "criminal intent" to violate the Act. Attachment 28. In view of the amount involved, this Office recommends that the Commission decline to enter into preprobable cause conciliation with Fesperman Insurance Company and instead take no further action with respect to it and close the file as it pertains to the company.

The Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc., requested preprobable cause conciliation in its response. The audit workpapers include a photocopy of a $500 check dated March 13, 1984, drawn on an account in the name of the association and made payable to Friends of Mattingly Committee. The photocopy of the check is also on a piece of Mattingly Committee stationery dated March 19, 1984, from Donald P. Gammon, treasurer. It is addressed to the association and informs them that the Committee cannot accept corporate contributions. Gammon states that he is returning the check and adds that he would be happy to accept a contribution on a personal check. In response Herald J. Bresnihan, treasurer of the association, notes that they sent two persons to a reception

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in honor of Mack Mattingly in Savannah on March 16, 1984, at a cost of $500. Attachment 29. In checking its records the association apparently discovered it had written the check to the Mattingly Committee, but did not discover that the check had been returned. Because it appears that the check was returned after the event and after it had been reviewed promptly by the treasurer, we recommend that the Commission decline to enter into preprobable cause conciliation with the association and instead take no further action with respect to it and close the file as it pertains to the association.

The Mattingly Committee records also included a check for $250 dated March 6, 1984, drawn on an account in the name of Morris Newspaper Corporation of Savannah, Georgia, and made payable to the Friends of Mattingly Committee. It also is accompanied by a copy of a letter dated March 7, 1984, from the treasurer to the corporation. The treasurer states that the Committee cannot accept corporate checks and is returning the $250 check. He also indicates that he could accept a contribution on a personal check. In response, Christopher H. Beecher states that after receiving the notification letter, the corporation "researched our files and are unable to either confirm or refute this allegation." He says that in the absence of any information, "we must assume that the contribution was made and made out of ignorance to the facts of the law." Attachment 30. Because the information indicates that the $250 check was promptly returned, this Office recommends that the Commission decline to enter into preprobable cause conciliation

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with Morris Newspaper Corporation and instead take no further action with respect to it and close the file as it pertains to the corporation.

III. RECOMMENDATIONS

1. Decline to enter into preprobable cause conciliation with Fesperman Insurance Company, Independent Freights Forwarders and Customs Brokers Association, and Morris Newspaper Corporation prior to a finding of probable cause to believe.

2. Take no further action with respect to the following respondents and close the file as it pertains to them:

a. A. T. Kennedy
b. George E. Luce
c. Emily Woodruff
d. Dr. John C. Adams, Jr., P.C.
e. Avail-Ability, Inc.
f. Bibb Distributing Company
g. Cathedral of Faith Church of God in Christ
h. Century 21 Cook Realty, Inc.
i. Century 21 of the Southeast, Inc.
j. Collins Brothers
k. Gary Cooper Construction
l. Curry Farm Supply
m. Dixie Trucking Company
n. Fesperman Insurance Company
o. Independent Freight Forwards and Customs Brokers Association
p. J & W Farms
q. Lex Jolley & Co., Inc.
r. Maricom Electronics, Inc.
s. Morris Newspaper Corporation
t. Oral & Maxillofacial Surgery Associates
u. Pacelli High School
v. The Pinkerton and Laws Co.
w. Reeves, Avary Associates
x. William L. Reno and Associates
y. Riverside Development
z. Bill Taylor & Associates
aa. Vaughn Lumber Company
bb. Bill Walker and Associates
cc. Willis and Veenstra Investment Co.

9304355547

3. Approve the appropriate letters.[5]

Lawrence M. Noble
General Counsel

10/16/90
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
1. Kennedy response and audit document
2. Luce responses and audit document
3. Woodruff responses and audit document
4. Brown Bros. Harriman response
5. Century 21 Cook Realty response and audit document
6. Century 21 of the Southeast response and audit document
7. Lex Jolley & Co. response and audit document
8. Oral and Maxillofacial response and audit document
9. Pinkerton and Laws response and audit document
10. Collins Bros. response and audit document
11. Curry Farm Supply response and audit document
12. J & W Farms response and audit document
13. Pacelli High School response and audit document
14. Reeves, Avary Associates response and audit document
15. William J. Reno & Associates response and audit document
16. Riverside Development response and audit document
17. Bill Taylor & Associates response
18. Willis and Veenstra Investment Co. response
19. Dr. John C. Adams, Jr., P.C. response and audit document
20. Dixie Trucking Company response and audit document
21. Maricom Electronics response and audit document
22. Bill Walker and Associates response and audit document
23. Avail-Ability response and audit document
24. Bibb Distributing Company response and audit document
25. Cathedral of Faith Church response and audit document
26. Gary Cooper Construction response and audit document
27. Vaughn Lumber Company response and audit document
28. Fesperman Lumber Company response and audit document
29. Freight Forwarders response and audit document
30. Morris Newspaper Corp. response and audit document

Staff persons: Elizabeth Campbell
Jeffrey D. Long
George F. Rishel

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5. The letters to the respondents for which taking no further action is recommended will contain the admonition regarding the prohibition on corporate contributions.

2304355548

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Friends of Mattingly and Donald P. Gammon, as treasurer; 74 Individuals; 17 Political Committees; 55 Corporations.	)	MUR 2989

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 22, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2989:

1. Decline to enter into preprobable cause conciliation with Fesperman Insurance Company, Independent Freights Forwarders and Customs Brokers Association, and Morris Newspaper Corporation prior to a finding of probable cause to believe.

(continued)

9304351549

2. Take no further action with respect to A. T. Kennedy, George E. Luce, Emily Woodruff, Dr. John C. Adams, Jr., P.C., Avail-Ability, Inc., Bibb Distributing Company, Cathedral of Faith Church of God in Christ, Century 21 Cook Realty, Inc., Century 21 of the Southeast, Inc., Collins Brothers, Gary Cooper Construction, Curry Farm Supply, Dixie Trucking Company, Fesperman Insurance Company, Independent Freight Forwards and Customs Brokers Association, J & W Farms, Lex Jolley & Co., Inc., Maricom Electronics, Inc., Morris Newspaper Corporation, Oral & Maxillofacial Surgery Associates, Pacelli High School, The Pinkerton and Laws Co., Reeves, Avary Associates, William L. Reno and Associates, Riverside Development, Bill Taylor & Associates, Vaughn Lumber Company, Bill Walker and Associates, and Willis and Veenstra Investment Co., and close the file as it pertains to these respondents.

3. Approve the appropriate letters, as recommended in the General Counsel's Report dated October 16, 1990.

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

Attest:

10-22-90
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Wed., Oct. 17, 1990 11:13 a.m.
Circulated to the Commission: Thurs., Oct. 17, 1990 11:00 a.m.
Deadline for vote: Mon., Oct. 22, 1990 11:00 a.m.

dh

9304355550

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

John E. Stumbo, Esq.
305 Knoxville Street
Fort Valley, GA 31030

RE: MUR 2989
George E. Luce

Dear Mr. Stumbo:

On July 20, 1990, a letter was sent to George E. Luce, to notify him that the Federal Election Commission found reason to believe that he had violated 2 U.S.C. § 441a(a)(1)(A). On August 29, 1990, we received a letter from you in response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against George E. Luce, and closed the file as it pertains to George E. Luce. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555 1

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Jon G. White
Senior Vice President
Citizens and Southern Trust Company
P.O. Box 4446
Atlanta, GA 30302

RE: MUR 2989
A.T. Kennedy

Dear Mr. White:

On July 20, 1990, a letter was sent to A.T. Kennedy, to notify him that the Federal Election Commission found reason to believe that he had violated 2 U.S.C. § 441a(a)(1)(A). On August 7, 1990, we received a letter from you in response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against A.T. Kennedy, and closed the file as it pertains to A.T. Kennedy. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351555 2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. Gary D. Cooper
Gary Cooper Construction Co.
2507 West Doublegate Drive
Albany, GA 31707

RE: MUR 2989
Gary Cooper Construction

Dear Mr. Cooper:

On August 3, 1990, Gary Cooper Construction was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 17, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Gary Cooper Construction, and closed the file as it pertains to Gary Cooper Construction. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351555 3

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555 4

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Ms. June E. Edmondson, Esq.
Williams & Jensen, P.C.
1101 Connecticut Ave., N.W.
Washington, D.C. 20036

RE: MUR 2989
Century 21 of the
Southeast, Inc.

Dear Ms. Edmondson:

On August 3, 1990, Century 21 of the Southeast, Inc., was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 24, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Century 21 of the Southeast, Inc., and closed the file as it pertains to Century 21 of the Southeast, Inc.. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351555

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351555556

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Ms. Yvonne Otts
Century 21 Cook Realty, Inc.
108 South Thornton Avenue
P.O. Box 926
Dalton, GA 30722-0926

RE: MUR 2989
Century 21 Cook Realty, Inc.

Dear Ms. Otts:

On August 3, 1990, Century 21 Cook Realty, Inc. was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 8, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Century 21 Cook Realty, Inc., and closed the file as it pertains to Century 21 Cook Realty, Inc.. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351555 7

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304355155568

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. Robert M. Nicholson
Comptroller & Secretary
Bibb Distributing Company
6401 Hawkinsville Road
P.O. Box 929
Macon, GA 31202

RE: MUR 2989
Bibb Distributing Company

Dear Mr. Nicholson:

On August 3, 1990, Bibb Distributing Company was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 28, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Bibb Distributing Company, and closed the file as it pertains to Bibb Distributing Company. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

2304351559

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555 60

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. William Q. Walker, Jr.
President
Bill Walker & Associates
McKinnon Airport
St. Simons Island, GA 31522

RE: MUR 2989
Bill Walker & Associates

Dear Mr. Walker:

On August 3, 1990, Bill Walker & Associates was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 8, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Bill Walker & Associates, and closed the file as it pertains to Bill Walker & Associates. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351561

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 5, 1990

Ms. Freddi S. Hagin
President
Avail-Ability, Inc.
561 Thornton Road
Suite S
Lithia Springs, GA 30057

RE: MUR 2989
Avail-Ability, Inc.

Dear Ms. Hagin:

On August 3, 1990, Avail-Ability, Inc. was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 18, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Avail-Ability, Inc., and closed the file as it pertains to Avail-Ability, Inc.. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

2304351562

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555563

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5, 1990

Edwin G. Hill
Dabbs, Hickman, Hill & Cannon
P.O. Box 727
319 South Main Street
Statesboro, GA 30458

RE: MUR 2989
Dr. John C. Adams, Jr., P.C.

Dear Mr. Hill:

On August 3, 1990, Dr. John C. Adams, Jr. was notified that the Federal Election Commission found reason to believe that he had violated 2 U.S.C. § 441b(a). On August 10, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Dr. John C. Adams, Jr., and closed the file as it pertains to Dr. John C. Adams, Jr. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). Your client should take immediate steps to insure that this activity does not occur in the future.

9304351556 4

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351555665

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

J. Barnett Woodruff
P.O. Box 750
Columbus, GA 31902-0750

November 5,1990

RE: MUR 2989
Emily Woodruff

Dear Mr. Woodruff:

On July 20, 1990, a letter was sent to Emily Woodruff, to notify her that the Federal Election Commission found reason to believe that she had violated 2 U.S.C. § 441a(a)(1)(A). On July 30, 1990, we received a letter from you in response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Emily Woodruff, and closed the file as it pertains to Emily Woodruff. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304355566

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Dr. Jonathan Greer II, Pastor
Cathedral of Faith C.O.G.I.C.
1137 Avon Avenue, S.W.
Atlanta, GA 30310

RE: MUR 2989
Cathedral of Faith Church
of God in Christ

Dear Dr. Greer:

On August 3, 1990, Cathedral of Faith Church of God in Christ was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 10, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Cathedral of Faith Church of God in Christ, and closed the file as it pertains to Cathedral of Faith C.O.G.I.C.. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351555 67

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555 68

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. A. Lee Vaughn
President
Vaughn Lumber Company
P.O. Box 31
Forsyth, GA 31029

RE: MUR 2989
Vaughn Lumber Company

Dear Mr. Vaughn:

On August 3, 1990, Vaughn Lumber Company was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 8, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Vaughn Lumber Company, and closed the file as it pertains to Vaughn Lumber Company. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351555 69

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351557 0

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

J. P. Cranmer
Senior Vice President
The Pinkerton and Laws Company
875 Douglas Road, N.E.
Atlanta, GA 30342

RE: MUR 2989
The Pinkerton and Laws Company

Dear Mr. Cranmer:

On August 3, 1990, the Pinkerton and Laws Company was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 14, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against the Pinkerton and Laws Company, and closed the file as it pertains to the Pinkerton and Laws Company. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351557 1

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351557 2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Ms. Beverly Allen
Business Manager
Oral and Maxillofacial Surgery
Associates
5243 Snapfinger Woods Dr.
Suite 106
Decatur, GA 30035

RE: MUR 2989
Oral and Maxillofacial
Surgery Associates

Dear Ms. Allen:

On August 3, 1990, Oral and Maxillofacial Surgery Associates was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 14, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Oral and Maxillofacial Surgery Associates, and closed the file as it pertains to Oral and Maxillofacial Surgery Associates. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351557 3

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304355155574

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. Christopher H. Beecher
Morris Newspaper Corporation
P.O. Box 8167
Savannah, GA 31412

RE: MUR 2989
Morris Newspaper Corporation

Dear Mr. Beecher:

On August 3, 1990, Morris Newspaper Corporation was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 17, 1990, you submitted a response to the Commission's reason to believe finding and requested that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to decline to enter into conciliation prior to a finding of probable cause to believe and to instead take no further action against Morris Newspaper Corporation, and closed the file as it pertains to Morris Newspaper Corporation. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

9304351557 5

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351555776

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Bill Willingham, President
Maricom Electronics, Inc.
P.O. Box 14287
Savannah, GA 31416

RE: MUR 2989
Maricom Electronics, Inc.

Dear Mr. Willingham:

On August 3, 1990, Maricom Electronics, Inc. was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 9, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Maricom Electronics, Inc., and closed the file as it pertains to Maricom Electronics. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

9304351557 7

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351557/8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Ms. Malinda J. Mortin
Secretary/Treasurer
Lex Jolley & Co., Inc.
34 Peachtree St., N.W.
Suite 2500
Atlanta, GA 30303-2316

RE: MUR 2989
Lex Jolley & Co., Inc.

Dear Ms. Mortin:

On August 3, 1990, Lex Jolley & Co., Inc., was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 7, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Lex Jolley & Co., Inc., and closed the file as it pertains to Lex Jolley & Co., Inc.. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351557 9

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555 80

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Gerald J. Bresnihan, Treasurer
Independent Freight Forwarders
and Customs Brokers Association
of Savannah, Inc.
P.O. Box 1465
Savannah, GA 31402

RE: MUR 2989
Independent Freight
Forwarders and Customs
Brokers Association of
Savannah, Inc.

Dear Mr. Bresnihan:

On August 3, 1990, Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc. was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August August 14, 1990, you submitted a response to the Commission's reason to believe finding and requested that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to decline to enter into conciliation prior to a finding of probable cause to believe and to instead take no further action against Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc., and closed the file as it pertains to Independent Freight Forwarders and Customs Brokers Association of Savannah, Inc. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304355581

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555 82

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Forrest W. Sweat, Jr., Esq.
Walker & Sweat
809 Elizabeth Street
P.O. Box 1100
Waycross, GA 31502

RE: MUR 2989
Fesperman Insurance Co.

Dear Mr. Sweat:

On August 3, 1990, Fesperman Insurance Company was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August August 9, 1990, you submitted a response to the Commission's reason to believe finding and requested that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to decline to enter into conciliation prior to a finding of probable cause to believe and to instead take no further action against Fesperman Insurance Company, and closed the file as it pertains to Fesperman Insurance Company. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). Your client should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555 84

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

F. M. Fairman
President
Dixie Trucking Company
P.O. Box 960
Brunswick, GA 31521

RE: MUR 2989
Dixie Trucking Company

Dear Mr. Fairman

On August 3, 1990, Dixie Trucking Company was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 14, 1990, Marie L. Massey submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Dixie Trucking Company, and closed the file as it pertains to Dixie Trucking Company. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office is a violation of 2 U.S.C § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell or Jeffrey Long, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304355155586

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. Larry Collins
Partner
Collins Brothers Farms
Route 3, Box 88A
Vienna, GA 31092

RE: MUR 2989
Collins Brothers

Dear Mr. Collins:

On August 3, 1990, Collins Brothers was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 14, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Collins Brothers, and closed the file as it pertains to Collins Brothers. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351555887

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. J.R. Curry, Jr.
Curry Farm Supply
P.O. Box 291
Shellman, GA 31786

RE: MUR 2989
Curry Farm Supply

Dear Mr. Curry:

On August 3, 1990, Curry Farm Supply was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 14, 1990, Eddie E. Arnold, Jr. of Garland, Craft & Arnold submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Curry Farm Supply, and closed the file as it pertains to Curry Farm Supply. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304355155888

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. Wayne Durrence
J & W Farms
P.O. Box 354
Glenville, GA 30427

RE: MUR 2989
J & W Farms

Dear Mr. Durrence:

On August 3, 1990, J & W Farms was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 8, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against J & W Farms, and closed the file as it pertains to J & W Farms. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2930435155889

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November

Ms. Sylvia A. Meares
Office Manager
Pacelli High School
Trinity Drive
Columbus, GA 31907-3299

RE: MUR 2989
Pacelli High School

Dear Ms. Meares:

On August 3, 1990, Pacelli High School was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 15, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Pacelli High School, and closed the file as it pertains to Pacelli High School. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304355590

FEDERAL FLECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Robert F. Reeves
Reeves, Avary Associates
5063 Fox Forest Circle
Lilburn, GA 30247

RE: MUR 2989
Reeves, Avary Associates

Dear Mr. Reeves:

On August 3, 1990, Reeves, Avary Associates was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 14, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Reeves, Avary Associates, and closed the file as it pertains to Reeves, Avary Associates. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351559 1

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. Francis C. Long, MBA, CPA
13A South Mulberry Street
P.O. Box 272
Statesboro, GA 30458

RE: MUR 2989
William L. Reno and
Associates

Dear Mr. Long:

On August 3, 1990, William L. Reno and Associates was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 9, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against William L. Reno and Associates, and closed the file as it pertains to William L. Reno and Associates. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351559 2

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. Charles J. Jones
President
Riverside Development
P.O. Box 7006
Macon, GA 31298

RE: MUR 2989
Riverside Development

Dear Mr. Jones:

On August 3, 1990, Riverside Development was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 17, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Riverside Development, and closed the file as it pertains to Riverside Development. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351559 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. William M. Taylor
c/o Bill Taylor & Associates, Inc.
4161 Carmichael Avenue
Suite 135
Jacksonville, FL 32207

RE: MUR 2989
Bill Taylor & Associates

Dear Mr. Taylor:

On August 3, 1990, Bill Taylor & Associates was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 6, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Bill Taylor & Associates, and closed the file as it pertains to Bill Taylor & Associates. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304355155994

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Mr. William Q. Walker, Jr.
President
Bill Walker & Associates
McKinnon Airport
St. Simons Island, GA 31522

RE: MUR 2989
Bill Walker & Associates

Dear Mr. Walker:

On August 3, 1990, Bill Walker & Associates was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 8, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Bill Walker & Associates, and closed the file as it pertains to Bill Walker & Associates. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2930435155995

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

November 5,1990

Lynwood G. Willis, A.I.A.
The Willis Group, Inc.
415 East Monroe Street
Jacksonville, FL 32202

RE: MUR 2989
Willis and Veenstra
Investment Co.

Dear Mr. Willis:

On August 3, 1990, Willis and Veenstra Investment Co. was notified that the Federal Election Commission found reason to believe that it had violated 2 U.S.C. § 441b(a). On August 7, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on October 22, 1990, to take no further action against Willis and Veenstra Investment Co., and closed the file as it pertains to Willis and Veenstra Investment Co. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Jeffrey Long or Elizabeth Campbell, the staff members assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351559 6

Sonat Inc.
Post Office Box [redacted]
Birmingham Al[redacted]202 2563
205 325 7110

Mary Lynn Bates
Assistant General Counsel

OGC 8559

90 NOV -6 AM 9:42

SONAT

October 31, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV -6 AM 11:36

Ms. Elizabeth Campbell
Federal Election Commission
1325 K Street, NW
Washington, DC 20463

Re: MUR 2989 - Southern Energy

Dear Ms. Campbell:

Enclosed please find a letter dated October 12, 1990 from George F. Rishel to "Southern Energy" at P. O. Box 960, Brunswick, Georgia 31520, which was apparently served on our registered agent by mistake. Our subsidiary company, Southern Energy Company, is located in Savannah, Georgia, and its mailing address is P. O. Box 2563, Birmingham, Alabama 35202. According to our registered agent in Georgia, The Prentice Hall Corporation System, Inc., there are four other companies doing business in Georgia with names that begin with "Southern Energy".

Please let me know if we need to take any further action with regard to this matter.

Very truly yours,

Mary Lynn Bates

Mary Lynn Bates

MLB:mdc

Enclosure

9304351559 7

Doc 8571

October 26,1990

RECEIVED
1990 NOV -6 AM 8:41
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV -7 AM 9:11

Mr. Lawrence M. Noble
Federal Election Commission
1036 Longworth House Office Building
Washington, DC 20515-6612

Dear Mr. Noble,

In reference to your letter of October 11, as I stated in my letter to Ms. Elizabeth Campbell on August 9th, this building - Morrow Professional Building- was incorporated in 1978 to separate that account from existing accounts that I had in same property. At that time I had formed a partnership to build this building, this partnership and corporation was dissolved three months later. The DBA checking account was never changed because the partnership was never indicated on the checks. All funds deposited under that checking account was my personal funds because no one else was ever involved.

The building was sold in September 1986.

Yours truly,

Alfred Hammack

Alfred Hammack
221 Upper Riverdale Road, Apt. 5E
Jonesboro, GA 30236

REF: MUR2989 - Alfred Hammack d/b/a/

9304351559 8

2902 Rivermeade Drive, N.W.
Atlanta, Georgia 30327

November 7, 1990

90 NOV -9 PM 12:29

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 2989 John A. Conant

Dear Ms. Lerner:

This is in response to your letter of October 23, 1990 regarding campaign contributions by me in 1982, 1984, and 1985 to Mack Mattingly, a candidate for the U. S. Senate. I have reviewed my files for these years and I did make payments as follows:

Date	Amount	Payable to	Check #
6/ 4/82	$ 250	Friends of Mattingly Campaign	
9/21/84	$1,000	Friends of Mattingly Campaign	1122
4/ 8/85	$1,000	Friends of Mattingly Campaign	1216
5/ 9/85	$1,000	Georgia Tribute to President Reagan	1227

I do not have a cancelled check for the $250 payment on 6/4/82, but I do have cancelled checks for the other three payments.

As I explained in my letter of July 31, 1990, I was under the impression that the limit on individual contributions to candidates for House and Senate seats was $1,000 per year. I therefore did not realize that my three contributions to the Friends of Mattingly Campaign Committee in 1982, 1984, and 1985 put me over the limit for campaign contributions. I did not understand that the contribution to the Georgia Tribute to President Reagan was in fact a contribution to the Mattingly Campaign.

2304351559

It was a seated dinner and eight guests joined Mrs. Conant and me at our table so the campaign netted substantially less than $1,000.

The original correspondence from your office referred to contributions to the Republican Primary Election of 8/12/86. Your letter indicates that additional contributions were made for the 1986 Senate Campaign. This is not the case, the search of my records shows that the contributions listed above are the only ones that I made in 1982, 1984, and 1985. I do find a contribution of $50 from Mrs. Conant's and my joint checking account on 1/6/86. Please note that I do not find a record of a $250 contribution on 9/21/84 as shown in the original correspondence. I assume that the Mattingly campaign records are incorrect in this regard. Clearly, all the contributions were intended for the General Election as I don't believe that Senator Mattingly had opposition in the Primary.

At this point, I would like to request pre-probable cause conciliation as I hope that it will be possible to settle this matter on a reasonable basis. Anything you can do to facilitate this will be appreciated.

Sincerely,

John A. Conant

JAC:ggb

enclosures
copies of checks #1122, 1216, & 1227

93043515600

JOHN A. CONANT
2902 RIVERMEADE DR. NW
ATLANTA, GA 30327

1122

Sept 2, 1984

64-10
610

PAY TO THE ORDER OF Friends of Mattingly Campaign Comm. $ 1,000.00

One thousand and no/100 DOLLARS

Trust Company Bank
Atlanta, Georgia

FOR

John A Conant

JOHN A. CONANT
2902 RIVERMEADE DR. NW
ATLANTA, GA 30327

1216

April 8, 1985

64-10
610

PAY TO THE ORDER OF Friends of Mattingly Campaign Comm. $ 1000.00

One thousand and no/100 DOLLARS

Trust Company Bank
Atlanta, Georgia

FOR Contribution

John A Conant

JOHN A. CONANT
2902 RIVERMEADE DR. NW
ATLANTA, GA 30327

1227

May 9, 1985

64-10
610

PAY TO THE ORDER OF Georgians Elected to Pres. Reagan $ 1,000.00

One thousand and no/100 DOLLARS

Trust Company Bank
Atlanta, Georgia

FOR

John A Conant

9304351560 1

PAY ANY BANK FED
ATLANTA, GA. 061000146
4905 4908 04 11-01-84 121010 98

#1122

PAY TO THE ORDER OF
FIRST AMERICAN BANK
WASHINGTON, DC
FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY
3257754

01 84 31

ANY BANK, FED
AMERICAN BK. NA
WASHINGTON, D.C.

01-99

049 34 782

PAY TO THE ORDER OF
The Citizens & Southern National Bank
ATLANTA, GEORGIA

049 34782

FOR DEPOSIT ONLY
FRIENDS OF MATTINGLY

#1216

#1227

079 35 109

PAY TO THE ORDER OF
The Citizens & Southern [illegible]
ATLANTA, GA

FOR DEPOSIT ONLY
FRIENDS OF [illegible]
GENERAL ACCOUNT

PAID

930435156002

OGC 8619

Carl Bolch, Jr.

P.O. Box 105035
Atlanta, Ga. 30348
404-431-7600

90 NOV 13 AM 10:43

November 6, 1990

MUR2489

90 NOV 13 PM 12:35

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, DC 20463

Dear Mr. Noble:

The purpose of this letter is to respond to your letter of October 23, 1990, concerning my wife's and my contributions to the Primary and General election campaigns of Mack Mattingly in the years 1983, 1985, and 1986.

By letter dated August 20, 1990, I initially accounted for the 1985 and 1986 checks, but did not recall the 1983 check at that time period. Further research and discussions with my wife have refreshed my recollection concerning all three checks, and they are accounted for as follows:

1) November 22, 1983, contributed by Carl E. Bolch, Jr., to the Primary election campaign of Mack Mattingly. Payee designated as "Friends of Mattingly."
2) June 5, 1985, contributed by my spouse, Susan Bass Bolch, to the Primary election campaign of Mack Mattingly. Payee designated as "Georgia Tribute to the President."
3) July 24, 1986, contributed by Carl E. Bolch, Jr., to General election campaign of Mack Mattingly. Payee designated as "Friends of Mattingly."

All three checks were drawn on a joint checking account maintained at Bank South, account number 158 58 40. The law permits an individual to contribute $1,000 to each election campaign. I contributed $1,000 to the Mattingly Primary campaign in 1983, and $1,000 to the General election campaign in 1986. My spouse contributed $1,000 in 1985 to the Mattingly Primary campaign. Accordingly, neither of us contributed an amount in excess of that permitted by law to any election campaign.

2304351560 3

The Mattingly campaign has not kept good records. On December 7, 1988, we requested in writing verification of our 1985 and 1986 contributions. The campaign replied that their records for 1985 and 1986 have been misplaced and cannot be located in their storage warehouse. We have had to reconstruct from memory, events which occurred no less than four, and in one case, seven years ago. We hope the information provided herein clarifies our record of legal campaign contributions.

Sincerely,

Carl Bolch, Jr.

/smj

9304351560 4

OGC 86695

LAW OFFICES

GLASS, McCULLOUGH, SHERRILL & HARROLD

1409 PEACHTREE STREET, N.E.

ATLANTA, GEORGIA 30309

TELEPHONE (404) 885-1500
TELEX: 54323
TELECOPIER: (404) 892-1801

WRITER'S DIRECT NUMBER

(404)-885-6774

90 NOV 19 PM 12:33

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 NOV 19 PM 3:58

November 15, 1990

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2989
John M. Stuckey, Jr.

3004351560 5

Dear Ms. Lerner:

I have your letter of October 23, 1990. Will you please advise me as to how a contribution made to Friends of Mattingly in October of 1983 impacts upon the issue of alleged excessive contributions made by me to Mack Mattingly as a candidate for the U.S. Senate in 1986.

Thank you very much for your attention to this matter.

Sincerely,

John M. Stuckey, Jr. (JWD)

06 c 8915

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 DEC 10 AM 10:42
OFFICE

LAW OFFICES
HULL, TOWILL, NORMAN & BARRETT
A PROFESSIONAL CORPORATION
P.O. BOX 1564
AUGUSTA, GEORGIA 30913

TRUST COMPANY BANK BUILDING
801 BROAD STREET
SEVENTH FLOOR
AUGUSTA, GEORGIA 30901

TELEPHONE (404) 722-4481
TELECOPIER (404) 722-9779

JOHN BELL TOWILL
ROBERT C. NORMAN
WM. HALE BARRETT
LAWTON JORDAN, JR.
PATRICK J. RICE
DOUGLAS D. BATCHELOR, JR.**
DAVID E. HUDSON
CHARLES W. ROWELL IV
NEAL W. DICKERT*
JOHN W. GIBSON
GAIL DUFFIE STEBBINS*
WILLIAM F. HAMMOND
MARK S. BURGREEN*
GEORGE R. HALL*
JAMES B. ELLINGTON
F. MICHAEL TAYLOR*
WILLIAM W. HORLOCK, JR.

**ALSO FL AND S.C.
*ALSO S.C.

December 5, 1990

Ms. Elizabeth Campbell
Federal Election Commission
Washington, D.C. 20463

RE: MUR 2989
Clayton P. Boardman, Jr.

Dear Ms. Campbell:

Please find enclosed our Statement of Designation of Counsel. I look forward to working with you.

Sincerely,

John W. Gibson

JWG:lkb

enc.

2304351560 6

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 DEC 10 PM 4:14

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989 Clayton P. Boardman, Jr.

NAME OF COUNSEL: John W. Gibson

ADDRESS: Hull, Towill, Norman & Barrett, P.C.
801 Broad Street 7th Floor
Augusta, GA 30901

TELEPHONE: 404-722-4481

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.

12-4-90
Date

Clayton P. Boardman
Signature
Clayton P. Boardman, Jr.

RESPONDENT'S NAME: Clayton P. Boardman, Jr.

ADDRESS: Boardman Petroleum
1804 Gordon Highway
Augusta, GA 30904

HOME PHONE: -

BUSINESS PHONE: 404-736-6466

9304335156007

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

90 DEC 11 AM 9:31

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	**SENSITIVE**
	)	
Friends of Mattingly and	)	
Donald P. Gammon, as treasurer	)	MUR 2989
71 Individuals	)	
17 Political Committees	)	
29 Corporations	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 19, 1990, the Commission found reason to believe Friends of Mattingly ("the Mattingly Committee") and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), and 441b(a), and 11 C.F.R. § 110.6(c)(3). On the same date, the Commission also found reason to believe 72 individuals had violated 2 U.S.C. § 441a(a)(1)(A), 17 political committees had violated 2 U.S.C. § 441a(a), and 55 corporations had violated 2 U.S.C. § 441b(a). On August 3, 1990, the Commission found reason to believe two additional individuals violated 2 U.S.C. § 441a(a)(1)(A). On October 22, 1990, the Commission decided to take no further action and closed the file as it pertained to three individual and twenty-six corporate respondents.

This report covers twelve more "corporate" respondents where action can be taken at this time. The Commission previously found that each of these respondents had violated 2 U.S.C. § 441b.

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II. LEGAL AND FACTUAL ANALYSIS

A. Not Incorporated or Not a Corporate Account

As part of its review, the Audit Division sought to verify the corporate status of apparent corporate contributors with the Georgia Secretary of State or similar offices in other states. Several of these respondents have submitted statements to the effect that they were or are not incorporated or that the check was not drawn on a corporate account.

The Mattingly Committee records included four checks on the account of Lakeside Farm. Lakeside Farm's contributions made in connection with the 1986 Senate Election of Mack Mattingly totaled $1,175 and included a check for $1000 dated February 6, 1986, a check for $50 dated May 19, 1986, a check for $25 dated July 9, 1986, and a check for $100 dated September 6, 1986. In response, Frank L. Woodard stated that the Lakeside Farm account is a personal account belonging to him and his wife, Pauline H. Woodard and that Lakeside Farm is not incorporated. See Attachment 1.

The records also contained two checks drawn on an account in the name of Robert T. Shircliff and Associates. One check for $500 dated February 12, 1985 and another for $250 dated January 7, 1986, were made payable to Friends of Mattingly. A response from William O. Inman III, President of Shircliff and Associates, included a certification from the First Union National Bank stating that the account on which these checks were written is a personal account. See Attachment 2, page 3.

Among the Mattingly records was a $1000 check drawn on an

2304351560 9

account in the name Alfred Hammack d/b/a Morrow Professional Building and dated September 26, 1986. Mr. Hammack responded that he operated as an individual and used the bank account Alfred Hammack d/b/a Morrow Professional Building as a title only. See Attachment 3, page 2. He stated that the business was never incorporated but that he had operated as a partnership for a two month period in 1978. Id.

Based on these circumstances, this Office recommends taking no further action with respect to Lakeside Farm, Robert T. Shircliff and Associates, and Alfred Hammack d/b/a Morrow Professional Building and closing the file with respect to these respondents.

B. Personal Account

The Mattingly records also included a $200 check drawn on an account in the name Moultrie Surgical Associates and dated September 9, 1986. In response, William M. McIntosh, counsel for Moultrie Surgical Associates, stated that Dr. Michael J. Haney and Dr. Thomas L. Estes made a joint $200 contribution with $100 charged to each doctor's draw account. See Attachment 4, page 2-3. Mr. McIntosh asserted that the doctors' names were listed individually on the upper "remittance advice" portion of the subject check and that this indicated the clear intent to show that the funds were being sent by individuals. See Attachment 4, page 2.

Based on these circumstances, this Office recommends taking no further action with respect to Moultrie Surgical Associates and closing the file in regard to this respondent.

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C. Refund

The Mattingly Committee records indicated a $250 check dated March 8, 1985 from Morris Brown College. On June 17, 1986, the Friends of Mattingly refunded the $250 and the voucher for the check states that it is a refund of a corporate contribution. See Attachment 5, page 2.

Therefore, this Office recommends taking no further action with respect to Morris Brown College and closing the file in regard to this respondent.

D. Returned Check

The Friends of Mattingly records also included a $500 check drawn on an account in the name A.G. Spanos Development and dated November 12, 1985. Natalia Orfanos, Public Relations, responded that the corporation routinely makes political contributions through its central office in Stockton. However, she indicated that the check in question had been prepared in the Atlanta division by an individual unaware of the federal regulations regarding contributions. See Attachment 6, page 1. Ms. Orfanos stated that the Friends of Mattingly promptly returned the corporate contribution to the Atlanta division at which time the check was voided. She enclosed a copy of the voided check. See Attachment 6, page 2.

Therefore, this Office recommends taking no further action with respect to A.G. Spanos Development and closing the file in regard to this respondent.

E. Unpaid Debt

It is unlawful for any corporation to make a contribution

9304351561 1

or expenditure to political candidates or committees. 2 U.S.C. § 441b(a). Commission regulations provide that credit extended for a length of time beyond normal business or trade practice by any person is considered a contribution, unless the creditor has made a commercially reasonable attempt to collect the debt. 11 C.F.R. § 100.7(a)(4).

Commission regulations allow a corporation to extend credit to a candidate, political committee, or other person in connection with a Federal election provided that the credit is extended in the ordinary course of the corporations' business and the terms are substantially similar to extensions of credit to to nonpolitical debtors which are of similar risk and size of obligation. 11 C.F.R. § 114.10(a). A corporation may forgive or settle a debt if the creditor has treated the outstanding debt in a commercially reasonable standard. 11 C.F.R. § 114.10(c).

Settlements will satisfy the standards of commercial reasonableness if three conditions are met:

> (1) the initial extension of credit was extended in the ordinary course of the corporation's business and the terms are substantially similar to extensions of credit to nonpolitical debtors which are of similar risk and size of obligation;
>
> (2) the candidate or political committee or person has undertaken all commercially reasonable efforts to satisfy the outstanding debt; and
>
> (3) the corporate creditor has pursued its remedies in a manner similar in intensity to that employed by the corporation in pursuit of a non-political debtor, including lawsuits if filed in similar circumstances. 11 C.F.R. § 114.10(c).

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The corporation or the debtor must also file a statement of settlement with the Commission including the initial terms of credit, the steps the debtor has taken to satisfy the debt and remedies pursued by the creditor. 11 C.F.R. § 114.10(c).

A review of the records of Friends of Mattingly indicated that Armada Vehicle Rental, Inc. made a contribution totaling $240.59 in connection with the 1986 Senate election of Mack Mattingly. Ray Miller, President of Armada, responded that the $240.59 was not a contribution from Armada but the total amount for invoices for car rentals to the Mattingly Committee which were billed but never paid. See Attachment 7, page 1-4. Mr. Miller stated that Armada wrote this amount off as uncollectible. See Attachment 7, page 1.

Although it appears that the original extension of credit was extended in the ordinary course of Armada's business and the terms of were substantially similar to extensions of credit to nonpolitical debtors which are of similar risk and size of obligation, Mr. Miller did not indicate what action, if any, Armada had pursued in order to collect the debt. Mr. Miller did not indicate what efforts, if any, Friends of Mattingly took to satisfy the debt. Neither Friends of Mattingly nor Armada filed a statement of settlement with the Commission.

Therefore, it appears that Armada violated 2 U.S.C. § 441b(a) by making a corporate contribution when it failed to pursue debtor Friends of Mattingly in a manner similar to a non-political debtor or to file a statement of settlement with the Commission as required by 11 C.F.R. 114.10(c). However,

2304351561 3

based on the relatively small amount involved, this Office recommends that the Commission take no further action with respect to Armada Vehicle Rental, Inc. and close the file as it pertains to this respondent.

F. Other Circumstances

Five other corporate respondents involve contributions ranging from $150 to $300.

The Mattingly Committee records included a $250 check drawn on an account in the name of OB-GYN Associates, P.A. of Marietta, Georgia and dated May 17, 1985. Carolyn Ivey, Bookkeeper, responded that one of the doctors had asked that she send a contribution to the campaign. See Attachment 8, page 2. She stated that she did not know that it was inappropriate to write a check from the office account, a corporate account. Id.

A review of the records of the Friends of Mattingly revealed a $200 contribution check, drawn on a account in the name of Stubbs Shipping Company and dated June 26, 1986. John Stubbs, President, responded that Stubbs Shipping is no longer an active corporation. See Attachment 9, page 2. He stated that at the time of the contribution, it was believed to be legal or his accountant charged it to his personal account. Id. Mr. Stubbs stated that because the corporation was 100 percent owned by him, it was a frequent practice for checks to be drawn on the Stubbs Shipping account and then charged to his personal account. Id.

A check for $300 drawn on an account in the name Family and Marriage Resources and dated September 10, 1986 was among

2304351561 4

the Mattingly Committee records. Counsel for Family and Marriage Resources indicated that Mr. Jim Powers, President of Family and Marriage Resources, believed that he wrote a check in order to purchase two tickets to a Reagan rally to be held in Atlanta on October 8, 1986. See Attachment 10, page 2. Counsel stated that Mr. Powers did not know that purchasing two tickets to a political rally was a violation of the Federal Election Campaign Act. Id. Counsel also noted that Friends of Mattingly did not return the check to Family and Marriage Resources with the advice that corporations are not allowed to make campaign contributions. Id.

Mattingly Committee records indicated a $150 contribution made with check dated September 29, 1986 and drawn on an account in the name Standard Southeast, Incorporated. Daniel Szucs, President, responded that due to the date of the contribution, he was unsure of the circumstances surrounding the contribution to Friends of Mattingly. See Attachment 11, page 2. He indicated that his company was a small company and that he could not recall any other time in its history that political contributions had been made. Id.

Friends of Mattingly records included one check for $25 dated May 8, 1986 and another for $250 dated May 21, 1985 drawn on an account in the name Ed Voyles Chrysler-Plymouth. Barry Banister, General Manager of Ed Voyles Chrysler-Plymouth, responded that William Voyles made the $275 in contributions from the corporate account instead of his personal account. See Attachment 12, page 3. Banister stated that the corporation

2304351561 5

"will see that it does not happen again." Id.

Based on the relative small amounts involved and the other noted circumstances, this Office recommends that the Commission take no further action with respect to OB-GYN Associates, P.A., Stubbs Shipping Company, Family and Marriage Resources, Standard Southeast, Incorporated, and Ed Voyles Chrysler-Plymouth.

III. RECOMMENDATIONS

1. Take no further action with respect to the following respondents and close the file as it pertains to them:

   a. Lakeside Farm
   b. Robert T. Shircliff and Associates
   c. Alfred Hammack d/b/a Morrow Professional Building
   d. Moultrie Surgical Associates
   a. Morris Brown College
   f. A.G. Spanos Development
   g. Armada Vehicle Rental, Inc.
   h. OB-GYN Associates, P.A.
   i. Stubbs Shipping Company
   j. Family and Marriage Resources
   k. Standard Southeast, Incorporated
   l. Ed Voyles Chrysler-Plymouth

2. Approve the appropriate letters.[1]

Lawrence M. Noble
General Counsel

12/10/90
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
1. Lakeside Farm response
2. Robert T. Shircliff and Associates response and

---

1. The letters to respondents who are incorporated and for which taking no further action is recommended will contain an admonition regarding the prohibition on corporate contributions.

9304351561 6

certification from First Union National Bank
3. Alfred Hammack d/b/a Morrow Professional Building response and audit document
4. Moultrie Surgical Associates, P.C. response and audit document
5. Morris Brown College check and refund check
6. A.G. Spanos response and voided check
7. Armada Vehicle Rental, Inc. response and invoices
8. OB-GYN Associates, P.A. response and check
9. Stubbs Shipping Company response and audit document
10. Family and Marriage Resources response and check
11. Standard Southeast, Incorporated response and audit document
12. Ed Voyles Chrysler-Plymouth response and audit documents

Staff persons: Elizabeth Campbell
Mary Taksar

9304351561 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Mattter of	)	
	)	MUR 2989
Friends of Mattingly and	)	
Donald P. Gammon, as treasurer;	)	
71 Individuals;	)	
17 Political Committees;	)	
29 Corporations.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 13, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 2989:

1. Take no further action with respect to Lakeside Farm; Robert T. Shircliff and Associates; Alfred Hammack d/b/a Morrow Professional Building; Moultrie Surgical Associates; Morris Brown College; A.G. Spanos Development; Armada Vehicle Rental, Inc.; OB-GYN Associates, P.A.; Stubbs Shipping Company; Family and Marriage Resources; Standard Southeast, Incorporated; and Ed Voyles Chrysler-Plymouth, and close the file pertaining to these respondents.

2. Approve the appropriate letters, as recommended in the General Counsel's Report dated December 10, 1990.

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

Attest:

12-13-90
Date

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

Received in the Secretariat: Tues., December 11, 1990 9:31 a.m.
Circulated to the Commission: Tues., December 11, 1990 11:00 a.m.
Deadline for vote: Thurs., December 13, 1990 11:00 a.m.

dh

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

Mr. Barry W. Banister, General Manager
Ed Voyles Chrysler-Plymouth
789 Cobb Parkway, S.E.
Marietta, GA 30062

RE: MUR 2989
Ed Voyles Chrysler-Plymouth

Dear Mr. Banister:

On August 3, 1990, Ed Voyles Chrysler-Plymouth was notified that the Federal Election Commission found reason to believe that Ed Voyles Chrysler-Plymouth violated 2 U.S.C. § 441b(a). On September 11, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Ed Voyles Chrysler-Plymouth and closed the file as it pertains to Ed Voyles Chrysler-Plymouth. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351562O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

Mr. Dan Szucs, President
Standard Southeast, Incorporated
1555 Oakbrook Drive, Suite 100
Norcross, GA 30093

RE: MUR 2989
Standard Southeast, Incorporated

Dear Mr. Szucs:

On August 3, 1990, Standard Southeast, Incorporated was notified that the Federal Election Commission found reason to believe that Standard Southeast, Incorporated violated 2 U.S.C. § 441b(a). On August 23, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Standard Southeast, Incorporated and closed the file as it pertains to Standard Southeast, Incorporated. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351562 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

Kathleen Ford Bay, Esq.
Small, Craig & Werkenthin
Suite 1100, 100 Congress Avenue
Austin, TX 78701-4099

RE: MUR 2989
Family and Marriage
Resources

Dear Ms. Bay:

On August 3, 1990, Family and Marriage Resources was notified that the Federal Election Commission found reason to believe that Family and Marriage Resources violated 2 U.S.C. § 441b(a). On September 10, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Family and Marriage Resources and closed the file as it pertains to Family and Marriage Resources. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). Your client should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351156224

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

Mr. John Stubbs, President
Stubbs Shipping Company
Post Office Drawer 1543
Fernandina Beach, FL 32034

RE: MUR 2989
Stubbs Shipping Company

Dear Mr. Stubbs:

On August 3, 1990, Stubbs Shipping Company was notified that the Federal Election Commission found reason to believe that Stubbs Shipping Company violated 2 U.S.C. § 441b(a). On September 26, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Stubbs Shipping Company, and closed the file as it pertains to Stubbs Shipping Company. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351556226

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

OB-GYN Associates, P.A.
72 Plaza Way
Marietta, GA 30060

RE: MUR 2989
OB-GYN Associates, P.A.

Dear Gentlemen:

On August 3, 1990, OB-GYN Associates, P.A. was notified that the Federal Election Commission found reason to believe that OB-GYN Associates, P.A. violated 2 U.S.C. § 441b(a). On September 20, 1990, OB-GYN Associates, P.A. submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against OB-GYN Associates, P.A. and closed the file as it pertains to OB-GYN Associates, P.A. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351562 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

Mr. Ray Miller, President
Armada Vehicle Rental, Inc.
P.O. Box 48405
Doraville, GA 30362

RE: MUR 2989
Armada Vehicle Rental, Inc.

Dear Mr. Miller:

On August 3, 1990, Armada Vehicle Rental, Inc. was notified that the Federal Election Commission found reason to believe that Armada Vehicle Rental, Inc. violated 2 U.S.C. § 441b(a). On September 24, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Armada Vehicle Rental, Inc. and closed the file as it pertains to Armada Vehicle Rental, Inc. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351556330

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

Natalia Orfanos, Public Relations
A.G. Spanos Development, Inc.
1341 W. Robinhood Drive
Stockton, CA 95207

RE: MUR 2989
A.G. Spanos Development, Inc.

Dear Ms. Orfanos:

On August 3, 1990, A.G. Spanos Development, Inc. was notified that the Federal Election Commission found reason to believe that A.G. Spanos Development, Inc. violated 2 U.S.C. § 441b(a). On August 28, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against A.G. Spanos Development, and closed the file as it pertains to A.G. Spanos Development. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351563 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

Mr. Charles W. Moore
Vice President for Finance
Morris Brown College
643 Martin Luther King, Jr. Dr., N.W.
Atlanta, GA 30314

RE: MUR 2989
Morris Brown College

Dear Mr. Moore:

On August 3, 1990, Morris Brown College was notified that the Federal Election Commission found reason to believe that Morris Brown College violated 2 U.S.C. § 441b(a). On October 9, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Morris Brown College, and closed the file as it pertains to Morris Brown College. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

William M. McIntosh, Esq.
Fallin and McIntosh
39 North Main Street, P.O. Box 250
Moultrie, GA 31776

RE: MUR 2989
Moultrie Surgical
Assoc., P.C.

Dear Mr. McIntosh:

On August 3, 1990, your client, Moultrie Surgical Assoc., P.C., was notified that the Federal Election Commission found reason to believe that Moultrie Surgical Assoc., P.C. violated 2 U.S.C. § 441b(a). On August 24, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Moultrie Surgical Assoc., P.C. and closed the file as it pertains to Moultrie Surgical Assoc., P.C. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

The Commission reminds you that using a corporate account to make a contribution to a candidate for federal office appears to be a violation of 2 U.S.C. § 441b(a). Your client should take immediate steps to insure that this activity does not occur in the future.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351563 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

Mr. Alfred Hammack
221 Upper Riverdale Road, Apt. 5-E
Jonesboro, GA 30236

RE: MUR 2989
Alfred Hammack d/b/a
Morrow Professional
Building

Dear Mr. Hammack:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Alfred Hammack d/b/a Morrow Professional Building violated 2 U.S.C. § 441b(a). On August 9, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Alfred Hammack d/b/a/ Morrow Professional Building, and closed the file as it pertains to Alfred Hammack d/b/a/ Morrow Professional Building. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

William O. Inman III, President
Robert T. Shircliff and Associates, Inc.
2529 Gulf Life Tower
Jacksonville, FL 32207

RE: MUR 2989
Robert T. Shircliff and Associates

Dear Mr. Inman:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Robert T. Shircliff and Associates violated 2 U.S.C. § 441b(a). On September 28, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Robert T. Shircliff and Associates, and closed the file as it pertains to Robert T. Shircliff and Associates. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 21, 1990

Mr. Frank L. Woodard
Lakeside Farm
Route 1, Box 223
Hayesville, N.C. 28904

RE: MUR 2989
Lakeside Farm

Dear Mr. Woodard:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Lakeside Farm violated 2 U.S.C. § 441b(a). On September 19, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on December 13, 1990, to take no further action against Lakeside Farm, and closed the file as it pertains to Lakeside Farm. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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If you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
91 JAN -8 AM 11:13

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
Rose Briglevich M.D., P.C.	)	
Brown Brothers Harriman and Co.	)	MUR 2989
Folsom Construction Company	)	
Pickett, Pickett & Pickett	)	

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to Rose Briglevich M.D., P.C., Brown Brothers Harriman and Co., Folsom Construction Company, and Pickett, Pickett & Pickett, based on the assessment of the information presently available.

1/7/90

Date

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 14, 1991

Mr. Will Hays Pickett, Jr.
Pickett, Pickett & Pickett
Edge Building
225 North Main Street
Jasper, GA 30143

RE: MUR 2989
Pickett, Pickett & Pickett

Dear Mr. Pickett:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 19, 1990, the Federal Election Commission found reason to believe that Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a), 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

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than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

2304351556 45

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2989
Pickett, Pickett, & Pickett)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On October 22, 1986, Pickett, Pickett & Pickett made a $1,000 contribution to the Friends of Mattingly committee. On June 19, 1990, the Commission found reason to believe that Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a) by making a corporate contribution to a Federal candidate and instituted an investigation into this matter.

II. ANALYSIS

The Federal Election Act of 1971, as amended ("the Act"), prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A).

A review of the reports submitted by the Friends of Mattingly revealed that on October 22, 1986, Pickett, Pickett & Pickett, a law firm, made a $1,000 contribution in connection with the 1986 U.S. Senate Election of Mack Mattingly. In response to interrogatories, Mr. Will Hays Pickett, Jr., of Pickett, Pickett & Pickett indicated that the firm was a Georgia corporation and had

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made a $1,000 contribution to the Mattingly Committee. Mr. Pickett stated that the check was sent pursuant to a solicitation through the mail. He also stated that Pickett, Pickett & Pickett did not knowingly and willfully violate the law.

Based on the aforementioned information provided by Pickett, Pickett & Pickett, the contribution made to Friends of Mattingly was a corporate contribution in violation of 2 U.S.C. § 441b(a).

III. **GENERAL COUNSEL'S RECOMMENDATION**

Find probable cause to believe that Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a).

1/11/91
Date

Lawrence M. Noble
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 14, 1991

Mr. Randy Folsom, President
Folsom Construction Company
Route 4, Box 34
Cordele, GA 31015

RE: MUR 2989
Folsom Construction Company

Dear Mr. Folsom:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 19, 1990, the Federal Election Commission found reason to believe that Folsom Construction Company, violated 2 U.S.C. § 441b(a), 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.

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Should you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2989
Folsom Construction Company)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On May 28, 1985, Folsom Construction Company made a $1,000 contribution to the Friends of Mattingly committee with a check made payable to the "Georgia Tribute to the President." On June 19, 1990, the Commission found reason to believe that Folsom Construction Company violated 2 U.S.C. § 441b(a) by making a corporate contribution to a Federal candidate and instituted an investigation into this matter.

II. ANALYSIS

The Federal Election Act of 1971, as amended ("the Act"), prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A).

A review of the reports submitted by the Friends of Mattingly revealed that Folsom Construction Company made a $1,000 contribution in connection with the 1986 U.S. Senate Election of Mack Mattingly. The Mattingly Committee reported the receipt of $1,000 contribution check from Folsom Construction, dated May 28,

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1985 and made payable to "Georgia Tribute to the President."

In response to interrogatories, Ms. Brenda Clements of Folsom Construction Company indicated that the company was incorporated in 1985. She also stated that the $1,000 contribution check was drawn on a corporate account and that the check was never returned or voided.

Based on the aforementioned, Folsom Construction Company made a corporate contribution in violation of 2 U.S.C. § 441b(a).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Folsom Construction Company violated 2 U.S.C. § 441b(a).

1/11/91
Date

LM Noble (JPR)
Lawrence M. Noble
General Counsel

2304351565 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 14, 1991

Edward Hoenig, Deputy Manager
Brown Brothers Harriman and Co.
59 Wall Street
New York, NY 10005

RE: MUR 2989
Brown Brothers Harriman
& Co.

Dear Mr. Hoenig:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 19, 1990, the Federal Election Commission found reason to believe that Brown violated 2 U.S.C. § 441b(a), 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 no probable cause to believe that a violations 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

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than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

Enclosure
Brief

2304351565 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2989
Brown Brothers Harriman & Co.)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On June 5, 1986, Brown Brothers Harriman & Co. made out a $1,000 cashier's check payable to the Friends of Mattingly committee. On June 19, 1990, the Commission found reason to believe that Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a) by making a corporate contribution to a Federal candidate and instituted an investigation into this matter.

II. ANALYSIS

The Federal Election Act of 1971, as amended ("the Act"), prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A).

A review of the reports submitted by the Friends of Mattingly revealed that on June 5, 1986, Brown Brothers Harriman & Co. made a $1,000 contribution in connection with the 1986 U.S. Senate Election of Mack Mattingly. In response to interrogatories, Edward Hoenig, Deputy Manager of Brown Brothers, indicated that Brown Brothers had not made the contribution in question to the

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Mattingly Committee. He stated that Brown Brothers is a licensed private bank that issues cashier's checks for its clients in the ordinary course of business. Mr. Hoenig indicated that the check in question was issued to J.M. Ireland, a client of the bank. He stated that the cashier's check was issued on June 5, 1986 pursuant to Ms. Ireland's instructions and that the $1,000 was debited to her principal account. He enclosed a copy of the cashier's check which indicates on its face that the payment was ordered by J.M. Ireland and was issued from her personal funds.

Based on the aforementioned information provided by Brown Brothers Harriman & Co., Brown Brothers did not make a corporate contribution in violation of 2 U.S.C. § 441b(a).

III. GENERAL COUNSEL'S RECOMMENDATION

Find no probable cause to believe that Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a).

Date 1/11/91

Lawrence M. Noble
General Counsel

9304351565

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 14, 1991

Rose Briglevich M.D., P.C.
Smyrna Medical Building, Suite 207
3903 South Cobb Drive
Smyrna, GA 30080

RE: MUR 2989
Rose Briglevich M.D., P.C.

Dear Dr. Briglevich:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on June 19, 1990, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441b(a), 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

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than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Mary Taksar, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

LMNoble (JP)

Lawrence M. Noble
General Counsel

Enclosure
Brief

9304351565 7

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2989
Rose Briglevich M.D., P.C.)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

The Friends of Mattingly committee reported receiving a contribution check for $1,250, dated May 27, 1985, from Rose Briglevich M.D., P.C. The Committee also reported a check for $50, dated May 29, 1986, from Rose Briglevich M.D., P.C. An audit of the Mattingly Committee indicated that $300 was refunded to Dr. Briglevich. On June 19, 1990, the Commission found reason to believe that Rose Briglevich M.D., P.C. violated 2 U.S.C. § 441b(a) by making a corporate contribution to a Federal candidate and instituted an investigation into this matter.

II. ANALYSIS

The Federal Election Act of 1971, as amended ("the Act"), prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A).

A review of the reports submitted by the Friends of Mattingly revealed that Rose Briglevich M.D., P.C. made a $1250 and $50 contribution in connection with the 1986 U.S. Senate Election of

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Mack Mattingly. As noted, an audit indicated that a $300 refund was made to Dr. Briglevich. Therefore, Dr. Briglevich made a $1,000 contribution to the Mattingly Committee.

In response to interrogatories, Dr. Briglevich stated that as she recalled, she was contacted by the local Republican Party Headquarters to attend a reception and dinner hosted by President Reagan. She indicated that she was led to believe that she was donating money to see President Reagan and not to a local campaign. Dr. Briglevich also stated that she is foreign born and a naturalized citizen and was unaware of any rule governing donations. Dr. Briglevich did not refute the corporate status of her practice.

Based on the aforementioned, the $1,000 contribution from Rose Briglevich M.D., P.C. to Friends of Mattingly was a corporate contribution in violation of 2 U.S.C. § 441b(a).

III. GENERAL COUNSEL'S RECOMMENDATION

Find probable cause to believe that Rose Briglevich M.D., P.C. violated 2 U.S.C. § 441b(a).

1/11/91
Date

Lawrence M. Noble
General Counsel

9304351565 9

DOC 9999

CLARK & JUSTICE
Attorneys at Law
142 South Park Square
Suite H
Marietta, Georgia 30060
(404) 426-0777
Telecopier (404) 426-8968

Herman Clark, P.C.
Joseph T. Justice, P.C.

Of Counsel
Bert W. Cohen

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB -4 AM 11:04

January 31, 1991

Lawrence M. Noble
General Counsel
Federal Election Commission
Washington, DC 20463

91 FEB -4 PM 3:52

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

RE: Dr. Rose Briglevich M.D., P. C.
MUR 2989
Our File No. C91-252

Dear Sir,

Would you be so kind as to enter the enclosed Respondent's reply to General Counsel's brief in the file for the above cited case. I have enclosed an extra copy for you to indicate receipt and would request that you return a stamped copy to me.

Thank you for your attention to this matter. Should you have questions, please contact me.

Sincerely,

Herman Clark

Herman Clark

HC/cc
enclosures
cc: Dr. Rose Briglevich

9304351560

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2989
Rose Briglevich M. D., P.C.	)	

RESPONDENT'S REPLY TO GENERAL COUNSEL'S BRIEF

COMES NOW, Respondent, by and through her undersigned attorney and files this her response to General Counsel's brief:

I. Respondent's Statement of Case

In early April or May, 1985, Dr. Rose Briglevich M.D., a recognized Cobb County, Georgia community leader, was approached by the Georgia Republican Party to attend a reception and tribute to President Ronald Reagan. Since Ms. Briglevich is a foreign born, naturalized citizen of this great country, she was ecstatic at the opportunity to meet her president. She readily accepted the invitation. At no time did she understand nor was she ever advised that the money contributed to see the president was going to the Friends of Mattingly campaign committee.

Moreover, Respondent did not know until notified by the Commission in August, 1990 and reviewing the canceled check that the Friends of Mattingly committee was involved in and received the contribution. In fact, her check number 122 (see exhibit A attached hereto) was made payable to the "Georgia Tribute to the President".

The check tendered, on its face, reflects "Rose

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CLARK & JUSTICE
Attorneys at Law
142 South Park Square
Suite H
Marietta, Georgia 30060
(404) 426-0777

Briglevich, MD, PC". Albeit, the check indicated that Dr. Briglevich operated as a professional corporation, the checking account upon which this check was drawn was, in fact, a personal account maintained in the Fulton Federal Savings and Loan Association subsequently succeeded by the Fulton Federal Savings Bank (see exhibit B, attached hereto).

The $50.00 check dated 5-29-86 was never issued by Dr. Briglevich and, in fact, appears to be check number 342 dated 5-19-86 which was voided (as evidenced by exhibit C, attached hereto).

Dr. Briglevich has no knowledge nor do her records indicate a $300.00 refund from the Friends of Mattingly committee. However, General Counsel's statement of the case reflects that an audit of the Friends of Mattingly campaign account indicated that this money was refunded to Respondent.

Respondent denies ever giving a corporate campaign contribution to the Friends of Mattingly committee. Furthermore, Respondent denies violating 2 U.S.C. Section 441 b(a).

II. Argument

In order to find probable cause, the Movant must demonstrate under 2 U.S.C. Section 441b(a) that Dr. Briglevich made the subject contribution(s) as a corporation. Even arguendo, that Dr. Briglevich's check

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CLARK & JUSTICE
Attorneys at Law
142 South Park Square
Suite H
Marietta, Georgia 30060
(404) 426-0777

indicated, on its face, the letters PC which are an indication of a professional corporation, the account was clearly personal in nature and at no time did it contain corporate funds therefore defeating the claim that corporate funds were used in violation of 2 U.S.C. 441b(a). Furthermore, if in fact, the Friends of Mattingly committee refunded $300.00 to Dr. Briglevich, thereby reducing the contributed amount to $1,000.00, she would be in compliance with Federal Election laws even though she never knew she was contributing Mattingly's campaign.

III. Respondent's Prayers

WHEREFORE, Respondent prays that this Honorable Commission deny the recommendation of General Counsel and find that Respondent has not violated 2 U.S.C. Section 441b(a).

Respectfully submitted,

Herman Clark

Herman Clark
Attorney for Respondent
Georgia Bar No. 127050

Clark & Justice
142 South Park Square
Marietta, Georgia 30060
404-426-0777

9304351563

CLARK & JUSTICE
Attorneys at Law
142 South Park Square
Suite H
Marietta, Georgia 30060
(404) 426-0777

ROSE BRIGLEVICH MD PC 16 1084
GEORGE BRIGLEVICH
3903 SOUTH COBB DR. STE. 207
SMYRNA, GA 30080

122

5/27 19 85 64-7000 2610

PAY TO THE ORDER OF Georgia Eye Bank for the Prevention of Blindness $1,250.00

One Thousand and Two hundred and fifty no/100 DOLLARS

PROCESSED 03-08-84

Market Access Account
Fulton Federal Savings
and Loan Association
Atlanta, Georgia 30370

FOR

R. Briglevich

A351560

Exhibit A

9304351565

64-0878 FHLB-ATLANTA 64-0878
NOW SERVICES - ATLANTA CENTER
ATLANTA FRB GA 30303
4324 4372 US 08-04-85 13203197

Exhibit A

Fulton Federal Savings Bank

AFFIDAVIT

The below signed individual personally appeared before me and stated that she is a Second Vice-President and Branch Manager of Fulton Federal Savings Bank and hereby certifies account number to the benefit of Rose Briglevich and George Briglevich is a personal account and not a corporate account as indicated by the records of the bank.

This is the 28th day of January of 1991.

Ruth Mitchell

Ruth Mitchell

Sworn to and subcribed before me this
28th day of January 1991.

Patricia A. Wrenk

Notary Public

Notary Public, Fulton County, Georgia
My Commission Expires Feb 24 1992

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Exhibit B

342

ROSE BRIGLEVICH, M.D., P.C. 12-85
4002 RIDGE RD. 433-0434
SMYRNA, GA 30080

64-326/611

5/19 19 86

PAY TO THE ORDER OF Friends of Mattingly $ 50.00

Fifty no/100 DOLLARS

SBT Smyrna Bank & Trust Co.
Smyrna, Georgia

Exhibit 3

930435156 67

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: HERMAN CLARK, PC

ADDRESS: CLARK & JUSTICE
142 SOUTH PARK SQ.
MARIETTA, GA 30060

TELEPHONE: 404-426-0777

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.

1-26-91
Date

R. Briglevich
Signature

RESPONDENT'S NAME: Rose Briglevich

ADDRESS: SMYRNA Medical Bldg Suite 207
3903 South Cobb DR.
SMYRNA, GA 30080

HOME PHONE:

BUSINESS PHONE: 404-433-0434

9304351566 8

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB -5 AM 11:22

HAYS & ANSON
ATTORNEYS AT LAW

2700 ONE AMERICAN CENTER
600 CONGRESS AVENUE
AUSTIN, TEXAS 78701

TELEPHONE
512/478-4040

TELECOPIER
512/478-4140

January 31, 1991

Mr. Lawrence M. Noble
General Counsel
Ms. Mary Taskar
Staff Member
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

91 FEB -5 PM 3:10
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

Re: MUR 2989

Dear Mr. Noble and Ms. Taskar:

My client, Family and Marriage Resources, has asked me to send you the enclosed information to be included in and made part of the public record on this matter. We appreciate your prompt decision to take no further action and to close the file.

My client has taken steps to insure that a corporate account cannot be used to make inadvertent contributions to a candidate for federal office. In addition, the Executive Director of my client has reimbursed Family and Marriage Resources in the amount of $300 and a copy of his check is enclosed.

Very truly yours,

Kathleen Ford Bay

Kathleen Ford Bay

cc: Jim Powers
Enclosure
KFB/jaf

2304351 5669

JAMES L POWERS
MARIPAT POWERS
6803 CACTUS CROSSING
AUSTIN TX 78737

Total Asset Account

156

1/24 1991

25-80
440

PAY TO THE ORDER OF Family and Marriage Resources $ 300.00

Three hundred and 00/100 DOLLARS

A.G. Edwards & Sons, Inc.

BANK ONE

BANK ONE, COLUMBUS, NA
Columbus, Ohio 43271

FOR Reimb. Mattindo tickets

Dan Powers

930435156700

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

91 JAN 31 AM 9:57

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	**SENSITIVE**
Friends of Mattingly and	)	
Donald P. Gammon, as treasurer	)	MUR 2989
74 Individuals	)	
17 Political Committees	)	
17 Corporations	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 19, 1990, the Commission found reason to believe Friends of Mattingly ("the Mattingly Committee") and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), and 441b(a), and 11 C.F.R. § 110.6(c)(3). On the same date, the Commission also found reason to believe 72 individuals had violated 2 U.S.C. § 441a(a)(1)(A), 17 political committees had violated 2 U.S.C. § 441a(a), and 55 corporations had violated 2 U.S.C. § 441b(a). On August 3, 1990, the Commission found reason to believe two additional individuals violated 2 U.S.C. § 441a(a)(1)(A). On October 22, 1990, the Commission decided to take no further action and closed the file as it pertained to three individual and twenty-six corporate respondents. On December 13, 1990, the Commission decided to take no further action and closed the file as it pertained to twelve more corporate respondents. On January 14, 1991, briefs were mailed to four corporate respondents, recommending probable cause in three instances and no probable cause in one instance.

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This report covers 10 more corporate respondents where action can be taken at this time.[1] The Commission previously found that each of these respondents had violated 2 U.S.C. § 441b.

The Commission has already decided to take no further action against many of the corporate respondents in this matter where the amount of the contribution was less than $1,000. See General Counsel's Reports, dated October 16, 1990, and December 10, 1990.

II. LEGAL AND FACTUAL ANALYSIS

This report deals with the following corporate respondents and their contributions:

Contributor	Amount
Dunwoody Office Supply, Inc.	$150
Ellis Building Systems	$150
Farmers Tobacco Warehouse	$250
Patrician Properties	$150
Peoples' Transportation Services, Ltd.	$200
Bill Pilgrim Enterprises, Inc.	$250
Southern Energy	$250

1. As noted, the Commission has taken no further action with respect to 38 of the corporate respondents, and briefs have been sent to four more. Thus, with this report covering ten corporate respondents, 52 of the 55 original corporate respondents will have been addressed. The remaining three corporate respondents made contributions of $1,000 or more to the Mattingly Committee. One has not yet been located, and the investigation with respect to the other two is still underway.

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Stricklands Pharmacy	$150
Weatherly & Associates, Inc.	$250
General Roofing d/b/a White Roofing Company	$275

Incomplete responses have been received from Dunwoody Office Supply, Inc., Ellis Building Systems, Bill Pilgrim Enterprises, Inc., and Weatherly & Associates, Inc. Bill Pilgrim Enterprises submitted a written request for preprobable cause conciliation. None of the others have submitted a written response, but all have spoken with staff from this Office on one or more occasions concerning this matter.

Betsy McCamey was the owner of Dunwoody Office Supply at the time she wrote the $150 check to Friends of Mattingly. She has since sold the business. McCamey said that she wrote the check in order to attend a luncheon with Mack Mattingly and Elizabeth Dole. She did intend to make a contribution to Friends of Mattingly; she only wanted to attend the luncheon. A copy of the reply card obtained from the Audit Division's workpapers instructs luncheon attendees to make their checks payable to "Friends of Mattingly."

A representative from Ellis Buildings Systems said that Ellis Buildings Systems is a proprietorship rather than a corporation.

In Bill Pilgrim Enterprises' request for preprobable cause conciliation, counsel for the President of Pilgrim Enterprises stated for the record that his client was unaware that his contribution violation the Act. See Attachment 1.

Sam and Susan Weatherly of Weatherly & Associates, Inc., stated that their corporate check was returned by the Mattingly

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Committee and replaced with Mrs. Weatherly's personal check.

Based on the above circumstances and the small amount of the contributions, we recommend that the Commission decline to enter into preprobable cause conciliation with Bill Pilgrim Enterprises and take no further action with respect to it.

Reminder letters were sent to Farmers Tobacco Warehouse, Peoples' Transportation Services, Ltd., and Stricklands Pharmacy, but to date no response has been received. This Office has not been able to locate Patrician Properties, Southern Energy, and General Roofing d/b/a White Roofing Company.

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we recommend that the Commission also take no further action with respect to these entities as well as Dunwoody Office Supply, Inc., Ellis Building Systems, and Weatherly & Associates, Inc.

III. RECOMMENDATIONS

1. Decline to enter into conciliation with Bill Pilgrim Enterprises, Inc., prior to a finding of probable cause to believe.

2. Take no further action with respect to Dunwoody Office Supply, Inc.; Ellis Building Systems; Farmers Tobacco Warehouse; Patrician Properties; Peoples' Transportation Services, Ltd.; Bill Pilgrim Enterprises, Inc.; Southern Energy; Stricklands Pharmacy; Weatherly & Associates, Inc.; General Roofing Co. d/b/a White Roofing Company and close the file as it pertains to these respondents.

3. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

Date 1/30/91 BY: _____
Lois G. Lerner
Associate General Counsel

Attachment
1. Bill Pilgrim Enterprises, Inc., response

Staff person: Elizabeth Campbell

9304351567 5

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Friends of Mattingly and Donald P. Gammon, as treasurer; 74 Individuals; 17 Political Committees; 17 Corporations.	)	MUR 2989

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 4, 1991, the Commission decided by a vote of 4-0 to take the following actions in MUR 2989:

1. Decline to enter into conciliation with Bill Pilgrim Enterprises, Inc., prior to a finding of probable cause to believe.

2. Take no further action with respect to Dunwoody Office Supply, Inc.; Ellis Building Systems; Farmers Tobacco Warehouse; Patrician Properties; Peoples' Transportation Services, Ltd.; Bill Pilgrim Enterprises, Inc.; Southern Energy; Stricklands Pharmacy; Weatherly & Associates, Inc.; General Roofing Co. d/b/a/ White Roofing Company and close the file as it pertains to these respondents.

(continued)

9304351567 6

3. Approve the appropriate letters, as recommended in the General Counsel's Report dated January 30, 1991.

Commissioners Aikens, Elliott, Josefiak, and McGarry voted affirmatively for the decision; Commissioners McDonald and Thomas did not cast votes.

Attest:

2-4-91
Date

Helda Arnold
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., January 31, 1991 9:57 a.m.
Circulated to the Commission: Thurs., January 31, 1991 4:00 p.m.
Deadline for vote: Mon., February 4, 1991 4:00 p.m.

dh

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1991

Peoples' Transportation Services, Ltd.
P.O. Box 491261
Atlanta, GA 30349

RE: MUR 2989
Peoples' Transportation
Services, Ltd.

Dear Gentlemen:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Peoples' Transportation Services, Ltd., violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of the matter, the Commission determined on February 4, 1991, to take no further action against Peoples' Transportation Services, Ltd., and closed the file as it pertains to Peoples' Transportation Services, Ltd. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that using a corporate account to make a contribution to a candidate for Federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351567 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1991

Farmers Tobacco Warehouse
P.O. Box 432
Vidalia, GA 30474

RE: MUR 2989
Farmers Tobacco Warehouse

Dear Gentlemen:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Farmers Tobacco Warehouse violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of the matter, the Commission determined on February 4, 1991, to take no further action against Farmers Tobacco Warehouse, and closed the file as it pertains to Farmers Tobacco Warehouse. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that using a corporate account to make a contribution to a candidate for Federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351567 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1991

Betsy McCamey
Dunwoody Office Supply, Inc.
5481 Chamblee-Dunwoody Rd.
Dunwoody, GA 30362

RE: MUR 2989
Dunwoody Office Supply, Inc.

Dear Ms. McCamey:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Dunwoody Office Supply, Inc. ("the Corporation") violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On August 23, 1990, you spoke with staff from this office concerning the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on February 4, 1991, to take no further action against Dunwoody Office Supply, Inc., and closed the file as it pertains to Dunwoody Office Supply. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that using a corporate account to make a contribution to a candidate for Federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351568 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1991

Ellis Building Systems
Rt. 1, Highway 100 South
Tallapoosa, GA 30176

RE: MUR 2989
Ellis Building Systems

Dear Gentlemen:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Ellis Building Systems violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of the matter, the Commission determined on February 4, 1991, to take no further action against Ellis Building Systems, and closed the file as it pertains to Ellis Building Systems. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that using a corporate account to make a contribution to a candidate for Federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351568 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1991

Patrician Properties
P.O. Box 8879
Savannah, GA 31412

RE: MUR 2989
Patrician Properties

Dear Gentlemen:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Patrician Properties violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of the matter, the Commission determined on February 4, 1991, to take no further action against Patrician Properties, and closed the file as it pertains to Patrician Properties. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that using a corporate account to make a contribution to a candidate for Federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351568 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1991

Don F. DeFoor, Esquire
2175-B County Line Road
Douglasville, Georgia 30135

RE: MUR 2989
Bill Pilgrim Enterprises, Inc.

Dear Mr. DeFoor:

On August 3, 1990, Bill Pilgrim Enterprises, Inc. was notified that the Federal Election Commission found reason to believe that Bill Pilgrim Enterprises, Inc. violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On August 24, 1990, you submitted a request to enter into conciliation negotiations prior to a finding of probable cause to believe.

After considering the circumstances of the matter, the Commission determined on February 4, 1991, to decline to enter into conciliation and to instead take no further action against Bill Pilgrim Enterprises, Inc., and closed the file as it pertains to Bill Pilgrim Enterprises, Inc. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that using a corporate account to make a contribution to a candidate for Federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351568 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1991

Stricklands Pharmacy
111 Bonard
Glennville, GA 30427

RE: MUR 2989
Stricklands Pharmacy

Dear Gentlemen:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Stricklands Pharmacy violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of the matter, the Commission determined on February 4, 1991, to take no further action against Stricklands Pharmacy and closed the file as it pertains to Stricklands Pharmacy. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that using a corporate account to make a contribution to a candidate for Federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351568 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 14, 1991

Mrs. Susan Weatherly
Mr. Sam Weatherly
Weatherly & Associates, Inc.
P.O. Box 503
Tybee Island, GA 31328

RE: MUR 2989
Weatherly & Associates, Inc.

Dear Mr. & Mrs. Weatherly:

On August 3, 1990, you were notified that the Federal Election Commission found reason to believe that Weatherly & Associates, Inc. violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). On several occasions, you spoke with staff from this Office concerning the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on February 4, 1991, to take no further action against Weatherly & Associates, Inc., and closed the file as it pertains to Weatherly & Associates, Inc.. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The Commission reminds you that using a corporate account to make a contribution to a candidate for Federal office appears to be a violation of 2 U.S.C. § 441b(a). You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

9304351568 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Randy Folsom, President
Folsom Construction Company
Route 4, Box 34
Cordele, GA 31015

RE: MUR 2989
Folsom Construction Company

Dear Mr. Folsom:

On January 14, 1991, you were mailed a brief stating the position of the General Counsel on the legal and factual issues in this matter under review. This brief and accompanying letter notified you of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe that Folsom Construction Company violated 2 U.S.C. § 441b(a).

To date, you have not responded to the General Counsel's brief. Unless we receive a response from you within 10 days of your receipt of this letter, this Office will circulate a report to the Commission recommending a finding of probable cause. You should submit 10 copies of your response to the Secretary of the Commission, and forward 3 copies to the Office of the General Counsel.

Should you have any questions, please contact Mary Taksar, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

9304351568 6

OGC 0109

LAW OFFICES
PICKETT, PICKETT & PICKETT
A PROFESSIONAL CORPORATION
225 NORTH MAIN STREET
JASPER, GEORGIA 30143
(404) 692-2494

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
91 FEB 20 AM 9:48

WILL HAYS PICKETT
WILL HAYS PICKETT, JR.

ROSCOE PICKETT
(1883-1954)

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
91 FEB 20 AM 10:51

February 14, 1991

Ms. Mary Taksar
Federal Election Commission
Washington, DC 20463

RE: Pickett, Pickett & Pickett, P.C. (MUR 2989)

Dear Ms. Taksar:

Enclosed please find our response. Please let me hear from you so that we may settle this matter.

Sincerely yours,

Will Hays Pickett, Jr.

WHPJR/vlj

Enclosure

9304351560 7

BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF)

) MUR 2989

PICKETT, PICKETT & PICKETT, P.C)

RESPONDENT'S BRIEF

NOW COMES, the respondent, Pickett, Pickett & Pickett, P.C., and admits that it made a $1,000.00 contribution to the Friends of Mattingly, pursuant to a solicitation through the mail. Pickett, Pickett & Pickett, P.C. did not willfully, wantonly or knowingly violate the law.

This the 14th day of Feb, 1991.

Respectfully submitted,

PICKETT, PICKETT & PICKETT, P.C.

Will Hays Pickett, Jr.
Georgia State Bar No. 578255

225 North Main Street
Edge Building
Jasper, Georgia 30143
(404) 692-2494

9304351568 8

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB 25 AM 11:12

DLC 0159

Folsom Construction Co.

2281 US Hwy. 41 South
Cordele, Georgia 31015
Ph. (912) 273-6626
Fax (912) 273-7579

February 18, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

91 FEB 25 PM 3:42

Federal Election Commission
999 E Street N.W.
Washington, D.C. 20463

Re: MUR 2989 - Folsom Construction Co.

Dear Sirs:

As per your correspondence regarding the above this check was written inadvertently on the company account.

Sincerely,

Brenda Clements

Brenda Clements
Folsom Construction Co.

BC:bc

9304351156889

Campbell/Kirshbaum

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

91 MAR -6 PM 4:40

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE
EXECUTIVE SESSION
MAR 12 1991

In the Matter of	)	
	)	MUR 2989
Folsom Construction Company	)	
Pickett, Pickett & Pickett	)	
Rose Briglevich M.D., P.C.	)	
Brown Brothers Harriman & Co.	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On June 19, 1990, the Commission found reason to believe that Folsom Construction Company, Pickett, Pickett & Pickett, Rose Briglevich M.D., P.C., and Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a) by making a corporate contribution to a Federal candidate and instituted an investigation into this matter. After reviewing responses from Folsom Construction Company, Pickett, Pickett & Pickett, and Rose Briglevich M.D., P.C., on January 14, 1991, this Office sent General Counsel's briefs recommending probable cause to believe to these three respondents. After reviewing the response submitted by Brown Brothers Harriman & Co., on January 14, 1991, this Office sent a General Counsel' brief recommending no probable cause to believe to Brown Brothers.

Based on this Office's investigation and the responses to the General Counsel's briefs received from Folsom Construction Company, Pickett, Pickett & Pickett, and Rose Briglevich M.D., P.C., we are recommending that the Commission find probable cause to believe that Folsom Construction Company and Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a) and no probable cause to believe that Rose Briglevich M.D., P.C. violated 2 U.S.C.

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§ 441b(a). See Section II for a detailed discussion. This Office did not receive a response to the General Counsel's brief from Brown Brothers. We are recommending that the Commission find no probable cause to believe that Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a). See Section II for a detailed discussion.

II. **ANALYSIS**

The Federal Election Act of 1971, as amended ("the Act"), prohibits a corporation from making any contribution or expenditure to any candidate for federal office in connection with any election. 2 U.S.C. § 441b(a). The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A).

A review of the reports submitted by Friends of Mattingly revealed that Folsom Construction Company made a $1,000 contribution in connection with the 1986 U.S. Senate Election of Mack Mattingly. The Mattingly Committee reported the receipt of a $1,000 contribution check from Folsom Construction, dated May 28, 1985 and made payable to "Georgia Tribute to the President."

In response to interrogatories, Ms. Brenda Clements of Folsom Construction indicated that the company was incorporated in 1985. She also stated that the $1,000 contribution check was drawn on a corporate account and was never returned or voided. On January 14, 1991, this Office sent a General Counsel's brief to Folsom Construction which recommended that the Commission find

2304351569 1

probable cause to believe that Folsom Construction Company violated 2 U.S.C. § 441b(a). On February 18, 1991, Folsom Construction responded that the $1,000 contribution check was inadvertently written on the company account. See Attachment 1.

Based on the foregoing, this Office recommends that the Commission find probable cause to believe that Folsom Construction Company violated 2 U.S.C. § 441b(a).

A review of the reports submitted by Friends of Mattingly revealed that on October 22, 1990, Pickett, Pickett & Pickett, a law firm, made a $1,000 contribution in connection with the 1986 U.S. Senate Election of Mack Mattingly. In response to interrogatories, Mr. Will Hays Pickett, Jr. of Pickett, Pickett & Pickett indicated that the firm was a Georgia corporation and had made a $1,000 contribution to the Mattingly Committee. Mr. Pickett stated that the check was sent pursuant to a solicitation through the mail. He also stated that Pickett, Pickett & Pickett did not knowingly and willfully violate the law.

On January 14, 1991, this Office sent a General Counsel's brief to Pickett, Pickett & Pickett which recommended that the Commission find probable cause to believe that Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a). In its February 14, 1991 response, Pickett, Pickett & Pickett once again asserted that the firm made a $1,000 contribution pursuant to a solicitation received through the mail and that the firm did not willfully, wantonly or knowingly violate the law. See Attachment 2, page 2.

Based on the foregoing, this Office recommends that the Commission find probable cause to believe that Pickett, Pickett &

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Pickett violated 2 U.S.C. § 441b(a).

A review of the reports submitted by the Friends of Mattingly revealed that Rose Briglevich M.D., P.C. made a $1,250 contribution and a $50 contribution in connection with the 1986 U.S. Senate Election of Mack Mattingly. An audit of the Mattingly Committee revealed that a $300 refund was made to Dr. Briglevich. Therefore, it appeared that Rose Briglevich M.D., P.C. made a $1,000 contribution to the Mattingly Committee.

In response to interrogatories, Dr. Briglevich stated that as she recalled, she was contacted by the local Republican Party Headquarters to attend a reception and dinner hosted by President Reagan. She indicated that she was lead to believe that she was donating money to see President Reagan and not to a local campaign. Dr. Briglevich also stated that she is foreign born and a naturalized citizen and was unaware of any rule governing donations. Dr. Briglevich did not refute the corporate status of her practice.

On January 14, 1991, this Office sent a General Counsel's brief to Dr. Briglevich which recommended that the Commission find probable cause to believe that Rose Briglevich M.D., P.C. violated 2 U.S.C. § 441b(a). On February 4, 1991, we received a reply brief submitted by Dr. Briglevich's counsel. In this brief, Dr. Briglevich asserts that although the $1,250 check tendered reflects "Rose Briglevich, M.D., P.C." on its face, the checking account upon which it was drawn was a personal account maintained in the Fulton Federal Savings and Loan Association subsequently succeeded by Fulton Federal Savings Bank. See Attachment 3, pages

2304351569 3

2-3. The response brief included an affidavit from Ruth Mitchell, Second Vice-President and Manager of Fulton Federal Savings Bank, certifying that account Number is a personal account of Rose and George Briglevich and not a corporate account as indicated by the records of the bank. See Attachment 3, page 9. In her response brief, Dr. Briglevich also included documentation which indicates that the $50 contribution check was originally written on a corporate account but was voided. See Attachment 3, page 3. Dr. Briglevich asserts that she has no knowledge nor do her records indicate a $300 refund from the Mattingly Committee. Id. However, as noted earlier, an audit of the Committee indicated that $300 was refunded to Dr. Briglevich.

Based on the foregoing, this Office recommends that the Commission find no probable cause to believe that Rose Briglevich M.D., P.C. violated 2 U.S.C. § 441b(a) and close the file as it pertains to Rose Briglevich M.D., P.C.

A review of the reports submitted by the Friends of Mattingly revealed that on June 5, 1986, Brown Brothers Harriman & Co. made a $1,000 contribution in connection with the 1986 U.S. Senate Election of Mack Mattingly. In response to interrogatories, Edward Hoenig, Deputy Manager of Brown Brothers, indicated that Brown Brothers had not made the contribution in question to the Mattingly Committee. He stated that Brown Brothers is a licensed private bank that issues cashier's checks in the ordinary course of business. Mr. Hoenig stated that the check in question was issued to J.M. Ireland, a client of the bank. He stated that the cashier's check was issued on June 5, 1986 pursuant to

9304351569 4

Ms. Ireland's instructions and that the $1,000 was debited to her principal account. He enclosed a copy of the cashier's check which indicates on its face that payment was ordered by J.M. Ireland and was issued from her personal funds.

Based on the information provided by Mr. Hoenig, it appears that Brown Brothers Harriman & Co. did not violate 2 U.S.C. § 441b(a). On January 14, 1991, this Office mailed a General Counsel's brief to Brown Brothers which recommended that the Commission find no probable cause to believe that Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a). Brown Brothers did not respond to the General Counsel's brief. Therefore, this Office is recommending that the Commission find no probable cause to believe that Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a) and close the file as it pertains to Brown Brothers Harriman & Co.

III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

Based on the foregoing analysis, this Office recommends that the Commission find probable cause to believe that Folsom Construction Company and Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a).

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IV. RECOMMENDATIONS

1. Find probable cause to believe that Folsom Construction Company and Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a).

2. Find no probable cause to believe that Rose Briglevich M.D., P.C. and Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a) and close the file as it pertains to them.

3. Approve the attached conciliation agreements and appropriate letters.

3/6/91
Date

Lawrence M. Noble
General Counsel

Attachments:
1. Folsom Construction Company's Response
2. Pickett, Pickett & Pickett's Response
3. Rose Briglevich M.D., P.C.'s Response
4. Conciliation Agreement for Folsom Construction Company
5. Conciliation Agreement for Pickett, Pickett & Pickett

Staff assigned: Elizabeth Campbell
Mary Taksar

9304351556996

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2989
Folsom Construction Company;	)	
Pickett, Pickett & Pickett;	)	
Rose Briglevich M.D., P.C.;	)	
Brown Brothers Harriman & Co.	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of March 19, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2989:

1. Find probable cause to believe that Folsom Construction Company and Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a).

2. Find no probable cause to believe that Rose Briglevich M.D., P.C. and Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a) and close the file as it pertains to them.

3. Approve the conciliation agreements and appropriate letters, as recommended in the General Counsel's report dated March 6, 1991.

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

Attest:

3-20-91
Date

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

9304351569 7

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

March 26, 1991

Mr. Randy Folsom, President
Folsom Construction Company
Route 4, Box 34
Cordele, GA 31015

RE: MUR 2989
Folsom Construction Company

Dear Mr. Folsom:

On March 19, 1991, the Federal Election Commission found that there is probable cause to believe Folsom Construction Company violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended.

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 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 Mary Taksar or Elizabeth Campbell, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

LMNoble (792)

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

2304351569 8

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

March 26, 1991

Mr. Will Hays Pickett, Jr.
Pickett, Pickett & Pickett
Edge Building
225 North Main Street
Jasper, GA 30143

RE: MUR 2989
Pickett, Pickett & Pickett

Dear Mr. Pickett:

On March 19, 1991, the Federal Election Commission found that there is probable cause to believe Pickett, Pickett & Pickett violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended.

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 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 Mary Taksar or Elizabeth Campbell, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

L.M. Noble (JGT)

Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

9304 351 56 99

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 26, 1991

Herman Clark, Esquire
Clark & Justice
142 South Park Square
Suite H
Marietta, GA 30060

RE: MUR 2989
Rose Briglevich M.D., P.C.

Dear Mr. Clark:

This is to advise you that on March 19, 1991, the Federal Election Commission found that there is no probable cause to believe your client, Rose Briglevich M.D., P.C., violated 2 U.S.C. § 441b(a). Accordingly, the file in this matter has been closed as it pertains to Rose Briglevich M.D., P.C.

The file will be made part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Mary Taksar or Elizabeth Campbell, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

LMNoble (JA)

Lawrence M. Noble
General Counsel

9304351570 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 26, 1991

Edward Hoenig, Deputy Manager
Brown Brothers Harriman and Co.
59 Wall Street
New York, N.Y. 10005

RE: MUR 2989
Brown Brothers Harriman & Co.

Dear Mr. Hoenig:

This is to advise you that on March 19, 1991, the Federal Election Commission found that there is no probable cause to believe Brown Brothers Harriman & Co. violated 2 U.S.C. § 441b(a). Accordingly, the file in this matter has been closed as it pertains to Brown Brothers Harriman & Co.

The file will be made part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

If you have any questions, please contact Mary Taksar or Elizabeth Campbell, the attorneys assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 APR 22 AM 11:55

SIMMONS & McANDREWS
ATTORNEYS AND COUNSELORS AT LAW
1441 FOURTH STREET
SANTA MONICA, CALIFORNIA 90401

(213) 458-1405
FAX (213) 394-4028

COLLEEN CONWAY McANDREWS
JERRY MARGARET SIMMONS

91 APR 22 PM 3:29

April 17, 1991

Elizabeth Campbell, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 2989

Dear Ms. Campbell:

This letter is in response to your request for additional information in connection with MUR 2989. The focus of this matter as it relates to Northrop Employees Political Action Committee ("NEPAC") is an alleged violation of 2 USC Section 441a(a)(2)(A). You have requested information with respect to the redesignation of a contribution made in 1986.

The contribution in question concerns a NEPAC check made payable to Friends of Mattingly Committee dated March 10, 1986 in the amount of $2,000.00. This contribution was originally reported by NEPAC on its Report of Receipts and Disbursements (FEC 3X) filed on April 9, 1986 as being made in connection with Senator Mattingly's 1986 primary election. This report was amended on April 16, 1986, within one week of filing the initial report, to revise the election designation of this disbursement. This amended report reflects the fact that it was made in connection with Senator Mattingly's 1986 general election.

Unfortunately, virtually all of the NEPAC backup material for 1986 has been destroyed as allowed by law. (See, 2 USC Section 432(d); 11 CFR Sections 102.9(c) and 104.14(b)(3).) The paperwork associated with NEPAC, like other sizable federal committees, is voluminous and occupies a significant amount of storage space. Thus, NEPAC disposed of its 1986 records as permitted by law.

Thus, there are no records to confirm that the Mattingly campaign was contacted in writing to advise them that the $2,000.00 contribution dated March 10, 1986 was redesignated for the 1986 general election. However, our office has been advised by Ms. Lily Balian, Director, Civic Action at Northrop Corporation, that it was standard procedure for Northrop

2304351570 2

personnel in the Washington, D.C. office to advise the candidate's campaign regarding any such redesignations. Since this contribution was made over five years ago and is only one of hundreds of contributions NEPAC makes each year, Ms. Balian has no specific recollection of the circumstances surrounding this particular contribution. Moreover, none of the individuals who were employed in the Northrop Washington, D.C. office in 1986 are currently employed by Northrop.

Despite the fact that NEPAC has no evidence to confirm that the Mattingly campaign was advised regarding the redesignation, the fact that the NEPAC FEC 3X report was amended within one week to revise this designation is a strong indication that all necessary steps, including a written redesignation to the Mattingly campaign, were undoubtedly taken immediately.

We respectfully submit that NEPAC has not violated the Federal Election Campaign Act. The NEPAC FEC 3X report was amended within one week to accurately reflect the designation of the contribution to the Mattingly campaign. It was common practice for the candidate's campaign to be advised of any such redesignation. With this redesignation, the contributions to Senator Mattingly's 1986 primary campaign did not exceed $5,000. It seems unfair to penalize NEPAC for its inability to produce documentation of a written redesignation to the candidate's campaign five years after the contribution was made when the law specifically permits records to be destroyed after three years.

Nevertheless, should the Federal Election Commission determine that it desires to proceed further with this matter, we respectfully request pre-probable cause conciliation pursuant to 11 CFR Section 111.18(d). We believe this minor technical matter would best be dealt with in this fashion.

Please feel free to contact me at any time to discuss this matter further.

Sincerely yours,

Jerry Margaret Simmons

JMS/dm

2304351570 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 1, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Randy Folsom, President
Folsom Construction Company
Route 4, Box 34
Cordele, GA 31015

RE: MUR 2989
Folsom Construction Company

Dear Mr. Folsom:

On March 26, 1991, you were notified that the Federal Election Commission found probable cause to believe that Folsom Construction Company violated 2 U.S.C. § 441b(a). 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, the Office of the General Counsel will recommend that the Commission authorize the filing of a civil suit unless we receive a response from you with 15 days of your receipt of this letter.

Should you have any questions, please contact Elizabeth Campbell or Mary Taksar, the attorneys assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

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RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

91 APR 25 AM 10:51

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	
Friends of Mattingly and	)	
Donald P. Gammon, as treasurer	)	MUR 2989
	)	
17 Political Committees	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was generated by an audit conducted by the Federal Election Commission ("Commission") in accordance with the Federal Election Campaign Act of 1971, as amended ("the Act") pursuant to 2 U.S.C. § 438(b). On June 19, 1990, the Commission found reason to believe Friends of Mattingly ("the Mattingly Committee") and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), and 441b(a), and 11 C.F.R. § 110.6(c)(3). On the same date, the Commission also found reason to believe 17 political committees had violated 2 U.S.C. § 441a(a). This report covers the 17 political committees.

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II. LEGAL AND FACTUAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act") states that no multicandidate political committee may make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceeds $5,000. 2 U.S.C. § 441a(a)(2)(A). The term "election" means a general, special, primary, or runoff election. 2 U.S.C. § 431(1). The term

"multicandidate political committee" means a political committee which has been registered under 2 U.S.C. § 433 for six or more months which has received contributions from more than 50 persons and except for a State political party organization, has made contributions to five or more candidates for Federal office. 2 U.S.C. § 441a(a)(4). The Regulations state that in the case of a contribution designated for a particular election, "with respect to any election" means the election designated.[1] 11 C.F.R. § 110.1(a)(2). A contribution made after a primary, caucus, or convention and designated for any of these is made only to the extent that the contribution does not exceed net debts outstanding from the primary election, caucus, or convention. Id. An undesignated contribution is considered a primary contribution if it is made prior to or on the date of the primary. Id. An undesignated contribution is considered a general election contribution if it is made after the date of the primary. Id.

The Act also states that no person may make contributions to a candidate and his authorized political committees with respect to any Federal election which, in the aggregate, exceeds $1,000. 2 U.S.C. § 441a(a)(1)(A). The term "person" includes an individual, partnership, committee, association, corporation, labor organization, or any other

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1. This Office notes that the regulations governing this case are those in effect at the time the contributions were made and received. Therefore, citations to Parts 103, 104, and 110 of Title 11 of the Code of Federal Regulations refer to regulations in effect prior to the April 8, 1987 amendments to those sections.

organization or group of persons, but does not include the Federal Government or any authority of the Federal Government. 2 U.S.C. § 431(11).

A. **A.L. Williams & Associates PAC**

A.L. Williams & Associates PAC (ALWPAC) made a $5,000 contribution to Friends of Mattingly with a check dated October 31, 1986. On the face of the check, ALWPAC designated this contribution for the primary, which was held on August 12, 1986. See Attachment 1, Page 8. ALWPAC also made a second contribution in the amount of $5,000 to Friends of Mattingly on October 31, 1986. On the face of this check, ALWPAC designated this contribution for the general election.[2] See Attachment 1, Page 8.

In its response to the Commission's reason to believe findings, ALWPAC states that the October 31, 1986 contribution designated for the primary was for net debts outstanding. In an affidavit, Kevin King, Vice-President and General Counsel of A.L. Williams, indicates that ALWPAC relied on the statements of Robert Mason, the Financial Director of the Mattingly Committee, that the Committee had net debts outstanding from the primary election. See Attachment 1, page 9-10. Commission regulations require that a contribution made after the primary election and designated for the primary may be made only to the extent that

2. In its 1986 Post-Election Report, ALWPAC reported making a $5,000 contribution to the Committee on October 31, 1986 for primary debt. In this same report, ALWPAC reported a $5,000 contribution to the Committee on October 31, 1986 for the general election.

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the contribution does not exceed net debts outstanding from the primary election. The Audit division determined that the Mattingly Committee had no net debts outstanding after the primary and, in fact, finished the primary with a surplus of $193,202.10. The Mattingly Committee continues to vigorously dispute this finding.

As noted elsewhere in this report, the Mattingly Committee made similar representations to other political action committees in soliciting funds. Also, the Mattingly Committee continues to hold strong views that the Committee had a primary debt, thus indicating that the Committee genuinely believed that to be the case. Despite this disagreement between the Commission and the Mattingly Committee, we conclude that ALWPAC was not unjustified in relying on the representations made by Mr. Mason.

Based on these circumstances, this Office is recommending that the Commission take no further action in regard to A.L. Williams & Associates PAC and Jack Smith, as treasurer, and close the file as it pertains to these respondents.

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B. Lockheed Employee's Political Action Committee

Lockheed Employee's Political Action Committee made eight contributions totaling $10,000 to the Committee prior to the August 12, 1986 primary. It appears from copies of the checks and accompanying letters that Lockheed designated only two of the eight contributions. In its response to the Commission's reason to believe findings, Lockheed states that from March 3, 1982 until May 15, 1985, it assumed that pursuant to 11 C.F.R.

§ 110.2, Lockheed contributions made prior to the primary were primary contributions.[3] See Attachment 2, Page 2. However, in reports filed with the Commission, Lockheed disclosed that contributions made prior to June 7, 1985 were for the general election. In a telephone conversation with staff from this Office, Lockheed indicated that prior to June 1985, the treasurer did not understand how designation occurred and, therefore, just checked off the general election box on FEC forms. Lockheed stated that it assumed that the contributions would go to the next election. Lockheed notes that it designated all contributions made after May 15, 1985 and that on its June 7, 1985 contribution check it designated $500 for the primary and $500 for the general election. This $500 contribution to the primary which Lockheed made on June 7, 1985 brought Lockheed to its $5,000 primary contribution limit.[4] On February 26, 1986, Lockheed made its last contribution for the 1986 election cycle in the amount of $4,500. This $4,500 contribution was designated on the face of the check for the

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3. Pursuant to 11 C.F.R. § 110.1(a)(2)(ii), a contribution not designated in writing is a primary contribution if made on or before the date of the primary election. This Office acknowledges that Lockheed's reference to the language of 11 C.F.R. § 110.2 regarding contributions not designated in writing is appropriate. However, this Office notes that at the time the contributions were made, the language presently in 11 C.F.R. § 110.2 regarding contributions not designated in writing was contained in 11 C.F.R. § 110.1.

4. All prior contributions made by Lockheed were undesignated. Commission regulations require that these contributions be considered primary contributions because they were made prior to the date of the primary election.

general election.[5] Therefore, because Lockheed's primary contributions total $5,000 and its general election contributions total $5,000, it appears that Lockheed did not violate 2 U.S.C. § 441a(a) by exceeding its primary or general contribution limits. Nevertheless, it appears that Lockheed's reports to the Commission did not accurately report the election for which its contributions were made. In prior matters, the Commission has, after a reason to believe finding, taken no further action with respect to such reporting errors.

Based on the foregoing, this Office recommends that the Commission take no further action in regard to Lockheed Employee's Political Action Committee and Stephen E. Chaudet, as treasurer, and close the file as it pertains to these respondents. The notification letter will include a reminder that in the reports it files with the Commission, Lockheed must properly report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2.

C. **Flowers Industries Inc. Political Action Committee**

Flowers Industries Inc. Political Action Committee made two contributions to the Committee, $2,500 on February 13, 1985 and $5,000 on June 3, 1985. In its response to the Commission's reason to believe findings, Flowers submitted an affidavit from its treasurer, Earl Quigg. See Attachment 3. In his affidavit, Mr. Quigg states that Flowers made the February 13, 1985

5. When the $4,500 contribution is added to the $500 contribution which Lockheed designated to the general election on June 7, 1985, Lockheed reaches its general election limit.

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contribution for the primary election. In its 1985 February Monthly Report, Flowers disclosed this contribution as a contribution for the general election.[6] The copy of the February 13, 1985 check which Flowers sent indicates no designation, and there is no accompanying letter indicating a primary designation. As Commission regulations require an undesignated contribution made prior to a primary to be considered a primary contribution, Flowers' February 13, 1985 contribution is a primary contribution. Flowers' June 3, 1985 contribution is considered a general election contribution because it was designated as such on the face of the check. Based on these facts, it appears that Flowers did not violate 2 U.S.C. § 441a(a) by exceeding the $5,000 aggregate limit for contributions to the general election but it did fail to properly report the election designation of the February 13, 1985 contribution.

Based on the foregoing, this Office recommends that the Commission take no further action in regard to Flowers Industries Inc. Political Action Committee and Earl Quigg, as treasurer, and close the file as it pertains to these respondents. The notification letter will include a reminder that in the reports which it files with the Commission, Flowers must properly report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2.

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6. In Mr. Quigg's affidavit, he requests that if these contributions were not correctly reported to the Commission that the affidavit stand as a correction of such records.

D. Citizens & Southern Georgia Corporation Better Government Committee

Citizens & Southern Georgia Corporation Better Government Committee ("Citizens and Southern") made five contributions to the Mattingly Committee between September 23, 1983 and April 17, 1985, totaling $5,500. In its reports to the Commission, Citizens & Southern disclosed these contributions as primary contributions. In response to the Commission's reason to believe findings, Citizens & Southern stated that on July 25, 1985, it wrote a letter to the Mattingly Committee notifying the Committee that any contributions above the $5,000 aggregate limit for primary contributions were to be designated to the general election. See Attachment 4, Page 3. In this letter, Citizens & Southern specifically noted that checks dated May 21, 1985 and June 20, 1985 were to be designated to the general election. Id.

This Office notes that the April 17, 1985 contribution brought Citizens & Southern over its $5,000 primary contribution limit by $500. However, as noted above, Citizens & Southern redesignated all contributions over the $5,000 primary aggregate limit to the general election on July 25, 1985, approximately ninety days after Citizens & Southern exceeded its $5,000 primary aggregate limit.[7] In other matters, redesignation

7. Current Commission regulations require that a contribution which exceeds contribution limits when aggregated with the other contributions from the same contributor must be redesignated within 60 days or refunded by the treasurer of the recipient committee. 11 C.F.R. § 103.3(b)(3). In 1986, however, the regulation dealing with this subject stated that when a contribution cannot be determined to be legal, refunds must

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within 90 days has not been viewed as being done within a reasonable time. We note, however, that the amount of the excessive is relatively small and that redesignation was made at the contributor's initiative before this matter or the audit began.

Based on these circumstances, this Office recommends that the Commission take no further action in regard to Citizens & Southern Corporation Better Government Committee and James D. Dixon, as treasurer, and close the file as it pertains to these respondents. The notification letter will include a reminder that if a multicandidate committee notifies a recipient committee of a redesignation, it must file an amendment indicating the redesignation to the Commission report in which the contribution was originally disclosed.

E. United Technologies Corporation Political Action Committee

Prior to the August 12, 1986 primary, United Technologies Corporation Political Action Committee made six contributions, totaling $8,500, to the Committee.[8] In its response to the

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(Footnote 7 continued from previous page)
occur within a reasonable amount of time.

8. On March 3, 1982, United Technologies made a $500 contribution for primary debt. On November 15, 1983, United Technologies made a $1,000 undesignated contribution and on February 20, 1985, it made another undesignated contribution for $1,000. On March 27, 1986, United Technologies designated $3,000 for the primary while on August 12, 1986 and October 23, 1986, United designated $1,000 and $2,000, respectively, for the general election.

Base on the designations and the contribution dates of those contributions not designated, United Technologies' primary contributions totaled $5,500 and its general election contributions totaled $3,000.

Commission's reason to believe findings, United Technologies states that the Commission's $5,500 total for primary contributions includes a $500 contribution made on March 3, 1982 to help Mattingly retire his 1980 debt.[9] See Attachment 5, Page 1. A determination whether the Mattingly Committee still had 1980 primary debt as of March 3, 1982 is difficult to make at this time.[10] We note, however, that the amount involved here is relatively small and that United Technologies Corporation Political Action Committee evidently believed that it was making a contribution to retire 1980 debt.

Based on the foregoing, this Office recommends that the Commission take no further action in regard to United Technologies Corporation Political Action Committee and Donald E. Groce, as treasurer, and close the file as it pertains to these respondents.

F. **The National Association of Life Underwriters (NALU) Political Action Committee**

The National Association of Life Underwriters (NALU) Political Action Committee made contributions, totaling $10,000, to the Mattingly Committee from October 1983 through October 1986. In its response to the Commission's reason to

9. In its 1982 February Monthly Report, United Technologies reported that its March 3, 1982 contribution for $500 was for primary debt.

10. In a telephone conversation with staff from this Office, the Audit division indicated that the reports filed by the Mattingly Committee revealed a surplus of cash and no debts at the end of 1980; however, the Audit division is not certain that the Mattingly Committee had no 1980 debts because it may not have reported debts.

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believe findings, NALU indicates that it made primary contributions totaling $5,000 and general election contributions totaling $5,000.[11] See Attachment 6. NALU notes that the $3,850 contribution in question, made on October 23, 1986, was not a contribution for the general election because it was designated for primary debt on the face of the check. According to Commission regulations, a contribution for the primary election can be made after the primary to the extent that the contribution does not exceed net debts outstanding. 11 C.F.R. § 110.1(a)(2). NALU stated that the $3,850 contribution for primary debt was made in good faith reliance upon information from the Mattingly campaign that it had incurred primary campaign debt. See Attachment 6, Page 2 and Section II, Page 3 for an earlier discussion of this issue. NALU requested pre-probable cause conciliation in its response.

Based on the foregoing, this Office recommends that the Commission decline to enter into pre-probable cause conciliation and instead take no further action in regard to The National Association of Life Underwriters Political Action Committee and Bruce C. Hendrickson, as treasurer, and close the file as it pertains to these respondents.

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11. According to reports filed by NALU with the Commission, NALU made two contributions for the primary, $1,000 on October 5, 1983 and $150 on February 20, 1986, and one contribution, $3,850, for primary debt on October 23, 1986. According to NALU reports filed with the Commission, NALU made a $3,850 contribution for the general election on September 18, 1986 and $1,150 contribution for the general election on October 23, 1986.

G. **The Political Action Committee of the Dun & Bradstreet Corporation**

The Political Action Committee of the Dun & Bradstreet Corporation made seven contributions to the Committee between September 1983 and September 1986, totaling $6,119.34. In its reports filed with the Commission, Dun & Bradstreet disclosed all contributions as contributions for the general election. In its response to the Commission's reason to believe findings, Dun & Bradstreet indicated that it made a clerical error when it incorrectly reported the first $4,333.34 in contributions for the general instead of the primary and requested pre-probable cause conciliation. See Attachment 7.

This Office notes that because all of Dun & Bradstreet's contributions appear to be undesignated, it is the date of the contributions that is controlling, not the boxes which Dun & Bradstreet checked off on reports filed with the Commission. Based on the dates of the contributions, it appears that Dun & Bradstreet had a primary aggregate of $5,119.34 and a general aggregate of $1,000. This Office notes that Dun & Bradstreet exceeded its primary contribution limit by $119.34, a relatively small amount.

Based on the foregoing, this Office recommends that the Commission decline to enter into pre-probable cause conciliation and instead take no further action in regard to The Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer, and close the file as it pertains to these respondents. This Office will include in the

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notification letter a reminder that when a multicandidate committee exceeds its $5,000 primary election limit, it violates 2 U.S.C. § 441a(a) and that Dun & Bradstreet should take measures to ensure that it does not exceed this contribution limit in the future.

H. Banker's Trust New York Corporation Political Action Committee

Banker's Trust New York Corporation Political Action Committee made five contributions totaling $7,000 to the Committee between 1983 and 1986, $5,000 before the primary and $2,000 after the primary. This Office reviewed copies of three contribution checks which do not have designations on the face of the check or on the accompanying written statements. In its reports filed with the Commission, Banker's Trust disclosed all their contributions as contributions for the general election. In its response, Banker's Trust states that it improperly reported the election for which contributions were made because, at the time, the Banker's Trust traditionally made contributions for an election cycle which totaled well below the $5,000 aggregate limit permitted per election. See Attachment 8, Page 1. Banker's Trust indicates that the first $5,000 it contributed to the Committee should have been designated for the primary because this amount was contributed prior to the primary. Id. This Office notes although Banker's Trust did not exceed its $5,000 primary contribution limit, its reports to the Commission did not accurately report its first $5,000 in contributions as primary election contributions. As noted

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earlier, in prior matters, the Commission has, after a reason to believe finding, taken no further action with respect to such reporting errors.

On August 24, 1990, the Commission declined "at this time" to enter into pre-probable cause conciliation with Banker's Trust. Based on the foregoing, this Office recommends that the Commission decline to enter into pre-probable cause conciliation and instead take no further action in regard to Banker's Trust Political Action Committee and Nancy C. O'Connor, as treasurer, and close the file as it pertains to these respondents. The notification letter will include a reminder that in the reports it files with the Commission, Banker's Trust must report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2.

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I. **Public Service Political Action Committee**

Public Service Political Action Committee made five contributions totaling $5,500 prior to the primary and one $1,000 contribution after the primary. Public Service designated $5,500 of these contributions to the primary. In its response to the Commission's reason to believe findings, Public Service indicates that it reviewed its records and located a $500 contribution made to the Committee on February 12, 1982 which it failed to carry forward in its primary aggregate limit. See Attachment 9. Public Service notes that it subsequently made three contributions totaling $5,000 for the primary election during the 1986 election cycle and, thereby, exceeded its $5,000 primary aggregate limit by $500. Id.

Based on the foregoing and in light of the amount of the excessive contribution, this Office recommends that the Commission take no further action in regard to Public Service Political Action Committee and Roman Rice, as treasurer, and close the file as it pertains to these respondents. The notification letter will include a reminder that when a multicandidate committee exceeds the $5,000 aggregate primary limit, it violates 2 U.S.C. § 441a(a) and that Public Service should take measures to ensure proper and permissible designations and to report the election designations of its contributions in accordance with 11 C.F.R. § 110.2.

J. **Textron Inc. Political Action Committee**

Textron Inc. Political Action Committee made contributions totaling $9,500 prior to the primary.[12] In its reports filed with the Commission, Textron disclosed these contributions as contributions for the general election. It appears from a review of the contribution checks and two accompanying letters that Textron did not designate these contributions for the general election. As the contributions were not designated by Textron, Commission regulations require that they be considered primary contributions because they were made prior to the date of the primary. 11 C.F.R. § 110.1(a)(2). Therefore, Textron exceeded its primary aggregate by $4,500.

In its response to the Commission's reason to believe

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12. Textron made the following contributions: $1,000 on March 15, 1982; $1,000 on September 29, 1983; $1,000 on March 14, 1985; $1,000 on June 19, 1985; $1,000 on July 24, 1985; $2,000 on April 29, 1986; and $2,500 on June 3, 1986.

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findings, Textron indicates that it contributed a total of $8,500 and intended to contribute $5,000 to the primary election campaign and $3,500 to the general election campaign.[13] See Attachment 10. Textron states that the improper designation was a clerical error and it requests pre-probable cause conciliation.

On August 24, 1990, the Commission declined "at this time" to enter into pre-probable cause conciliation with Textron. Based on the foregoing and the amount of contributions which were improperly designated, this Office recommends that the Commission enter into pre-probable cause conciliation with Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer. This Office also recommends that the Commission approve the attached conciliation agreement

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K. Goldkist Political Action for Farmers

Goldkist Political Action for Farmers made a $1,000 undesignated contribution to the Committee on August 13, 1985. In its 1985 Year-End Report, Goldkist disclosed that this contribution was for the general election. According to Commission regulations, because the August 13, 1985 contribution was undesignated and was made prior to the primary, it is

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13. It appears that Textron omitted its March 15, 1982 contribution for $1,000 from its figure for total contributions.

considered a primary contribution.

On October 3, 1986, Goldkist made a $5,000 undesignated contribution to the Committee and disclosed it as a contribution for the general election in its 1986 Pre-General Report. Because Goldkist did not designate the contribution on the face of the check or by an accompanying written statement and the contribution was made after the primary election, Commission regulations make the contribution a general election contribution. Based on the dates of the contributions, it appears that Goldkist did not violate 2 U.S.C. § 441a(a) by exceeding its $5,000 general election limit but that it did improperly report the election designation for the August 13, 1985 contribution. Goldkist's response to the Commission's reason to believe findings consisted of a request for pre-probable cause conciliation. See Attachment 11.

On August 24, 1990, the Commission declined "at this time" to enter into pre-probable cause conciliation with Goldkist. Based on the foregoing, this Office recommends that the Commission decline to enter into pre-probable cause conciliation and take no further action in regard to Goldkist Political Action for Farmers and Paul Brower, as treasurer, and close the file as it pertains to these respondents. The notification letter will include a reminder that in its reports to the Commission, Goldkist must designate the election for which the contribution is made in accordance with 11 C.F.R. § 110.2.

L. **Northrop Employees Political Action Committee ("NEPAC")**

Northrop Employees Political Action Committee (NEPAC) made

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contributions totaling $10,000 to the Mattingly Committee from 1982 through 1986.[14] It appears that $7,000 of contributions were either designated to the primary by NEPAC or are considered primary contributions according to Commission regulations. Thus, it appears that NEPAC exceeded its primary contribution limit by $2,000.

The problematic contribution is the check for $2,000 dated March 10, 1986. The face of the check itself contains a typed notation designating the check for the "1986 primary." NEPAC's original 1986 April Quarterly Report disclosed the $2,000 contribution made on March 10, 1986 as designated for the primary election. However, on April 21, 1986, less than one week after filing its original 1986 April Quarterly Report, NEPAC filed an amended report disclosing that the $2,000 contribution was designated for the general election. See Attachment 12. A review of the Mattingly Committee reports revealed that despite the designation on the face of the check, the Mattingly Committee also disclosed this contribution as a contribution for the general election.

A contribution can be designated for a specific election in

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14. NEPAC's contributions to the Committee are as follows: $500 on March 22, 1982; $1,000 on September 23, 1983, $3,000 on March 1, 1985; $500 on June 28, 1985; $2,000 on March 10, 1986; $1,000 on April 29, 1986; $1,000 on June 3, 1986; and $1,000 on September 26, 1986. NEPAC designated the March 1, 1985 and March 10, 1986 contributions as primary election contributions and the April 29, 1986, June 3, 1986, and September 26, 1986 contributions as general election contributions. The March 22, 1982, September 23, 1983, and June 28, 1985 contributions were not designated and therefore, according to Commission regulations, are considered primary contributions based on the dates the contributions were made.

writing. 11 C.F.R. § 110.1(a)(2)(i). Although the $2,000 March 10, 1986 contribution was designated in writing for the 1986 primary election, NEPAC attempted to redesignate this contribution to the 1986 general election by filing an amended 1986 April Quarterly Report which designated this contribution for the general election. According to Ms. Lily Balian, Director of Civic Action at Northrop Corporation, it was standard procedure for Northrop personnel in the Washington D.C. office to advise a recipient candidate's campaign of any redesignations, such as that made by NEPAC for its March 10, 1986 contribution in the amount of $2,000. See Attachment 18. However, Ms. Balain has no specific recollection as to whether any sort of notification was sent to the Mattingly Committee for the contribution in question. Counsel for NEPAC noted that virtually all of the back up material for 1986 had been destroyed and therefore, NEPAC has no records to confirm that the Mattingly Committee was contacted regarding the redesignation.[15]

The fact that NEPAC amended its 1986 April Quarterly Report within one week of its original filing, the fact that it was standard procedure for NEPAC to notify recipients of NEPAC contributions of redesignations of those contributions, and the fact that the Mattingly Committee also disclosed the Match 10, 1986 contribution as designated for the general election,

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15. Counsel states that it seems unfair to penalize NEPAC for its inability to produce documentation of a written redesignation when campaign law permits records to be destroyed after three years.

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indicates that the March 10, 1986 contribution may have been properly redesignated. Nonetheless, the March 10, 1986 contribution is specifically designated for the primary election on the face of the check. Although it was standard practice to notify recipient committees regarding the redesignation of contributions, in this instance, NEPAC is unable to provide evidence that the Mattingly Committee was notified of the redesignation. Therefore, Commission regulations require that the contribution be considered a primary election contribution as it was designated as such on the contribution check. Thus, NEPAC exceeded its primary contribution limit by $2,000.

NEPAC has requested pre-probable cause conciliation in the event that the Commission decides to proceed further with this matter.

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M. Prudential Insurance Company of America Federal PAC

Prudential Insurance Company of America Federal PAC made contributions, totaling $7,500,[16] to the Committee from October 1983 through October 1986. It appears that all of these contributions were undesignated and that three contributions, totaling $6,500, were made prior to the primary and a $1,000 contribution was made after the primary.[17] According to Commission regulations, the contributions totaling $6,500 and made prior to the primary are primary contributions and the $1,000 contribution made after the primary is a general election contribution. Therefore, this Office notes that Prudential exceeded its $5,000 primary limit by $1,500. Prudential's response to the Commission's reason to believe findings consisted of a request for pre-probable cause conciliation and a statement that because the contributions were made so long ago, it had no records regarding the contributions. See Attachment 13, Page 1.

Based on the foregoing, this Office recommends that the Commission enter into pre-probable cause conciliation with Prudential Insurance Company of America Federal PAC and Milan E. Johnson, as treasurer, and approve the attached conciliation agreement

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16. Prudential's contributions to the Mattingly Committee are as follows: $500 on October 27, 1983; $5,000 on March 20, 1985; $1,000 on May 1, 1986; and $1,000 on October 24, 1986.

17. In the reports which Prudential filed with the Commission, it disclosed that the October 27, 1983, March 20, 1985 and May 1, 1986 contributions were primary contributions and that the October 24, 1986 contribution was a general election contribution.

N. American Financial Services Association Political Action Committee

American Financial Services Association Political Action Committee ("American Financial") made six contributions totaling $5,500 to the Committee from September 1983 to September 1986.[18] It appears from copies of the checks for the February 13, 1985, March 11, 1986, June 25, 1986, August 12, 1986, and September 29, 1986 contributions that American Financial did not designate these contributions. We have no copy of the check for the contribution made on September 13, 1983. American Financial has produced no evidence indicating that these contributions were designated for the general election, although in reports filed with the Commission, American Financial disclosed all of these contributions as contributions for the general election. In response to the Commission's reason to believe findings, American Financial merely requested pre-probable cause conciliation. See Attachment 14.

Because Commission regulations state that undesignated contributions made on or before the date of a primary are primary contributions, it appears that American Financial made $4,500 in primary contributions. Commission regulations also state that undesignated contributions made after the primary are general election contributions, therefore, it appears that American made

18. American Financial's contributions are as follows: $500 on September 13, 1983; $1,000 on February 13, 1985; $1,000 on March 11, 1986; $1,000 on June 25, 1986; $1,000 on August 12, 1986; and $1,000 on September 29, 1986.

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$1,000 in general election contributions. Thus, American Financial did not exceed its general election limit. If in fact American Financial had designated these contributions as general election contributions, it would have exceeded its general election contribution limit by $500, a relatively small amount.

On August 24, 1990, the Commission declined "at this time" to enter into pre-probable cause conciliation with American Financial. Based on the foregoing, this Office recommends that the Commission decline to enter into pre-probable cause conciliation and instead take no further action in regard to American Financial Services Association PAC and Thomas L. Thomas, as treasurer, and close the file as it pertains to these respondents. The notification letter will include a reminder that American Financial must properly account for the election designations of its contributions and that in its reports filed with the Commission, it must report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2.

O. **Morgan Companies Political Action Committee**

Morgan Companies Political Action Committee made contributions, totaling $10,000,[19] to the Committee from October 1983 through September 1986. It appears that Morgan Companies designated only one contribution, its March 14, 1986 contribution in the amount of $5,000. For this contribution,

19. Morgan Companies' contributions are as follows: $500 on October 5, 1983; $1,000 on January 30, 1985; $3,500 on March 14, 1986; $1,500 on March 14, 1986; $1,000 on April 26, 1986; and $2,500 on September 17, 1986.

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Morgan Companies designated $3,500 for the primary and $1,500 for the general election.[20] See Attachment 15, Page 93. In its reports to the Commission, Morgan Companies disclosed the October 5, 1983, and March 14, 1986 ($1,500) contributions as contributions for the primary and the January 30, 1985, March 14, 1986 ($3,500), April 26, 1986, and September 17, 1986 contributions as contributions for the general election.

The October 5, 1983, January 30, 1985, and April 26, 1986 contributions are considered primary contributions because these contributions were undesignated and made prior to the date of the primary. The September 17, 1986 is considered a general election contribution because it was undesignated and made after the primary. Therefore, Morgan Companies made $6,000 in primary contributions and $4,000 in general election contributions. Morgan, thereby, exceeded its $5,000 primary election contribution limit by $1,000.

On August 24, 1990, the Commission declined "at this time" to enter into pre-probable cause conciliation with Morgan Companies. Based on the foregoing, this Office recommends that the Commission enter into pre-probable cause conciliation with Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer, and approve the attached conciliation agreement

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20. In its response to the Commission's reason to believe findings, Morgan Companies included a copy of the accompanying letter sent with its March 14, 1986 contribution check to the Mattingly Committee. This letter indicates that for the $5,000 contribution, $3,500 was designated to the primary and $1,500 was designated to the general election. Morgan Companies did not provide copies of the contribution checks or accompanying letters indicating designation for the other contributions.

P. Committee to Re-Elect Senator Paula Hawkins

The audit of the Mattingly Committee also revealed that it appeared that the Committee to Re-Elect Senator Paula Hawkins made a contribution of $3,363.61 to the Committee. The audit report indicated that the Commission learned in MUR 2577 that the Floridians for President Reagan's Majority was a joint fundraising committee authorized by the Mattingly Committee and the Committee to Re-elect Senator Paula Hawkins. The audit report also stated that a joint fundraising agreement between the two committees indicated that expenses and proceeds were to be split equally. The audit report states that a report filed by the Floridians indicates gross proceeds of $14,075 and expenses of $776.78. Information contained in the file for MUR 2577 reveals that of the $14,075, $3,250 was earmarked for the Hawkins Committee and $3,325 for the Mattingly Committees with checks made payable to the committees and forwarded to the committees uncashed.[21] The audit report also indicated that expenses were paid from the remaining money and that the balance of $6,723.22 was forwarded to the Mattingly Committee. Based on the joint fundraising agreement, the Hawkins Committee was entitled to half of this amount or $3,363.61. Because the entire amount was retained by the Mattingly Committee, it appears that the Committee to Re-Elect Senator Paula Hawkins contributed $3,363.61 to the Committee and

21. In MUR 2577, respondent, Floridians for President Reagan's Majority, paid a $1,000 civil penalty to the Commission for violations of 2 U.S.C. §§ 433(a), 434(a), and 441a(a)(8).

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thereby exceeded its $1,000 contribution limit by $2,363.61.

In response to the Commission's reason to believe findings, the Committee to Re-Elect Senator Paula Hawkins stated that it had no records available regarding this subject because the Hawkins Committee only maintains its records for a three year period. See Attachment 16. Ms. Genean McKinnon, the treasurer, stated that she recalled a joint fundraising event with Senator Mattingly in Jacksonville and that she attended this event on behalf of Senator Hawkins. Ms. McKinnon states further that the Hawkins Committee did not intend to make a contribution to the Mattingly Committee and indicates that a bookkeeping error may have occurred. Ms. McKinnon also notes that the campaign is inactive and that they are carrying a few debts.[22]

Based on these facts, this Office will prepare a brief recommending that the Commission find probable cause to believe that the Committee to Re-Elect Senator Paula Hawkins violated 2 U.S.C. § 441a(a) by exceeding its $1,000 limit.

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22. The Commission's most current records indicate that the Committee to Re-Elect Senator Paula Hawkins received no contributions and made no disbursements for the 1990 election cycle as of June 30, 1989. As of June 30, 1989, the Hawkins Committee had a beginning and ending cash of $223 and debts of $46,075.

The Hawkins Committee has not filed disclosure reports with the Commission since the 1989 Mid-Year Report.

Q. **Associated General Contractors of America Political Action Committee**

Associated General Contractors of America Political Action Committee made contributions totaling $10,500 to the Committee from 1982 through 1986. In its disclosure reports, Associated indicated that $5,500 of its contributions were for the primary.[23] Because these contributions do not appear to have been designated by check or accompanying letter, Commission regulations require that the contributions be considered primary contributions based on the date of the contributions. In its response to the Commission's reason to believe findings, Associated states that the $500 excessive primary contribution was due to its failure to carry forward its March 4, 1982 contribution in future reports and that it requests pre-probable cause conciliation. See Attachment 17. This Office notes that the March 4, 1982 contribution was made early in the election cycle for the 1986 U.S. Senate Election in Georgia.

Based on the foregoing and the relatively small amount of the excessive contribution, $500, this Office recommends that the Commission decline to enter into pre-probable cause conciliation and instead take no further action and close the file in regard to Associated General Contractors of America Political Action Committee and John R. Gentille, as treasurer.

R. **Mattingly Committee**

This Office notes that its recommendations to take no further

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23. The contribution in questions were made on March 4, 1982, September 29, 1983, February 25, 1985, and April 5, 1985, well before the August 12, 1986 primary election.

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action in regard to twelve of the seventeen political committees does not mean that we conclude that the Mattingly Committee did not accept excessive contributions. The issue of acceptance of excessive contributions will be re-examined when all the issues relating to the Mattingly Committee are addressed.

III. RECOMMENDATIONS

1. Decline to enter into pre-probable cause conciliation and instead take no further action and close the file as it pertains to:

a. The National Association of Life Underwriters and Bruce C. Hendrickson, as treasurer;
b. The Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer;
c. Banker's Trust Political Action Committee and Nancy C. O'Connor, as treasurer;
d. Goldkist Political Action for Farmers and Paul Brower, as treasurer;
e. American Financial Services Association Political Action Committee and Thomas L. Thomas, as treasurer.
f. Associated General Contractors of America Political Action Committee and John R. Gentille, as treasurer.

2. Take no further action and close the file as it pertains to:

a. A.L. Williams & Associates PAC and Jack Smith, as treasurer;
b. Lockheed Employee's Political Action Committee and Stephen E. Chaudet, as treasurer;
c. Flowers Industries Inc. Political Action Committee and Earl Quigg, as treasurer;
d. Citizens & Southern Georgia Corporation Better Government Committee and James D. Dixon, as treasurer;
e. United Technologies Corporation Political Action Committee and Donald E. Groce, as treasurer;
f. Public Service Political Action Committee and Roman Rice, as treasurer.

3. Enter into conciliation prior to a finding of probable cause and approve the attached conciliation agreements for:

a. Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer.
b. Northrop Employees Political Action Committee (NEPAC) and Colleen C. McAndrews, as treasurer;
c. Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer; and

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d. Prudential Insurance Company of America Federal PAC and Milan E. Johnson, as treasurer.

4. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

Date 4/24/91

BY: Lois G. Lerner
Associate General Counsel

Attachments
1. A.L. Williams response
2. Lockheed response
3. Flowers Industries response
4. Citizens & Southern response
5. United Technologies response
6. NALU response
7. Dun & Bradstreet response
8. Banker's Trust response
9. Public Service response
10. Textron response
11. Goldkist response
12. Northrop response
13. Prudential response
14. American Financial response
15. Morgan response
16. Hawkins Committee response
17. Associated response
18. Northrop Letter
19. Conciliation Agreements (4)

Staff assigned: Elizabeth Campbell
Mary Taksar

9304351573 3

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DONNA ROACH DR
COMMISSION SECRETARY

DATE: APRIL 30, 1991

SUBJECT: MUR 2989 - GENERAL COUNSEL'S REPORT DATED APRIL 24, 1991.

The above-captioned document was circulated to the Commission on THURSDAY, APRIL 26, 1991 at 4:00 p.m.

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

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

This matter will be placed on the meeting agenda for TUESDAY, MAY 7, 1991.

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

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2989
Friends of Mattingly and Donald P. Gammon, as treasurer; 17 Political Committees.	)	

AMENDED CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on May 7, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2989:

1. Decline to enter into pre-probable cause conciliation and instead take no further action and close the file as it pertains to:
   a. The National Association of Life Underwriters and Bruce C. Hendrickson, as treasurer;
   b. The Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer;
   c. Banker's Trust Political Action Committee and Nancy C. O'Connor, as treasurer;
   d. Goldkist Political Action for Farmers and Paul Brower, as treasurer;
   e. American Financial Services Association Political Action Committee and Thomas L. Thomas, as treasurer;
   f. Associated General Contractors of America Political Action Committee and John R. Gentille, as treasurer.

(continued)

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2. Take no further action and close the file as it pertains to:

   a. A.L. Williams & Associates PAC and Jack Smith, as treasurer;
   b. Lockheed Employee's Political Action Committee and Stephen E. Chaudet, as treasurer;
   c. Flowers Industries Inc. Political Action Committee and Earl Quigg, as treasurer;
   d. Citizens & Southern Georgia Corporation Better Government Committee and James D. Dixon, as treasurer;
   e. United Technologies Corporation Political Action Committee and Donald E. Groce, as treasurer;
   f. Public Services Political Action Committee and Roman Rice, as treasurer.
   g. Northrop Employees Political Action Committee (NEPAC) and Colleen C. McAndrews, as treasurer;

3. Enter into conciliation prior to a finding of probable cause and approve the conciliation agreements to:

   a. Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer;
   b. Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer; and
   c. Prudential Insurance Company of America Federal PAC and Milan E. Johnson, as treasurer;

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as recommended in the General Counsel's report dated April 24, 1991

4. Take no further action and close the file with respect to the Committee to Re-Elect Senator Paula Hawkins and Genean McKinnon, as treasurer.

5. Approve the appropriate letters.

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

Attest:

5-10-91
Date

Marjorie W. Emmons
Secretary of the Commission

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Thomas L. Kraig, Jr., Esquire
Textron Inc.
40 Westminster Street
Providence, R.I. 02903

RE: MUR 2989
Textron Inc. Political
Action Committee and Gary E.
Atwell, as treasurer

Dear Mr. Kraig:

On July 10, 1990, the Federal Election Commission found reason to believe that Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer, violated 2 U.S.C. § 441a(a). At your request, on May 7, 1991, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Richard Moe, Esquire
David Polk & Wardwell
1300 I Street, N.W.
Washington, D.C. 20005

RE: MUR 2989
The Morgan Companies
Political Action Committee
and Cory N. Strupp, as
treasurer

Dear Mr. Moe:

On July 10, 1990, the Federal Election Commission found reason to believe that The Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer, violated 2 U.S.C. § 441a(a). At your request, on May 7, 1991, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

John E. DeWald, Esquire
Assistant General Counsel
Law Department
The Prudential Insurance Company
of America
751 Broad Street
Newark, N.J. 07102-3777

RE: MUR 2989
Prudential Insurance Company
of America Political Action
Committee and Milan E.
Johnson, as treasurer

Dear Mr. DeWald:

On July 10, 1990, the Federal Election Commission found reason to believe that Prudential Insurance Company of America Political Action Committee and Milan E. Johnson, as treasurer, violated 2 U.S.C. § 441a(a). At your request, on May 7, 1991, the Commission determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If your clients agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Jerry Simmons, Esquire
Simmons & McAndrews
1441 Fourth Street
Santa Monica, CA 90401

RE: MUR 2989
Northrop Employees Political Action Committee and Colleen C. McAndrews, as treasurer

Dear Mr. Simmons:

On July 10, 1990, your clients were notified that the Federal Election Commission found reason to believe that Northrop Employees Political Action Committee and Colleen C. McAndrews, as treasurer, violated 2 U.S.C. § 441a(a). On August 27, 1990 and April 17, 1991, you submitted responses to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to take no further action against Northrop Employees Political Action Committee and Colleen C. McAndrews, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a political committee must properly report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2. Your clients should take immediate steps to insure that all contributions are properly reported in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351557743

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 21, 1991

John R. Gentille, Treasurer
Associated General Contractors of America
Political Action Committee
1957 E Street, N.W.
Washington, D.C. 20006

RE: MUR 2989
Associated General
Contractors of America
Political Action Committee
and John R. Gentille, as
treasurer

Dear Mr. Gentille:

On July 10, 1990, Associated General Contractors of America Political Action Committee and you, as treasurer, were notified that the Federal Election Commission found reason to believe that Associated General Contractors of America Political Action Committee and you, as treasurer, violated 2 U.S.C. § 441a(a). On July 17, 1990, you submitted a response to the Commission's reason to believe finding and requested that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to decline to enter into conciliation prior to a finding of probable cause to believe and to instead take no further action against Associated General Contractors of America Political Action Committee, and you, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a multicandidate committee is prohibited from making contributions to a candidate for federal office or his authorized committees in excess of $5,000 in any election. You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351157745

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 21, 1991

Ms. Genean McKinnon, Treasurer
Committee to Re-Elect
U.S. Senator Paula Hawkins
701 Via Bella
P.O. Box 193
Winter Park, FL 32789

RE: MUR 2989
Committee to Re-Elect
U.S. Senator Paula
Hawkins and Genean McKinnon,
as treasurer

Dear Ms. McKinnon:

On July 10, 1990, you were notified that the Federal Election Commission found reason to believe that the Committee to Re-Elect U.S. Senator Paula Hawkins and you, as treasurer, violated 2 U.S.C. § 441a(a). On August 6, 1990, you submitted a letter in response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to take no further action against the Committee to Re-Elect U.S. Senator Paula Hawkins and you, as treasurer, and closed the file as it pertains to you and the Committee. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that the allocation of joint fundraising proceeds by the Floridians for President Reagan's Majority appears to have resulted in an excessive contribution by the Committee to Re-Elect U.S. Senator Paula Hawkins to the Friends of Mattingly Committee, in violation of 2 U.S.C. § 441a(a). You should take immediate steps to insure this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351157447

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Michael L. Kerley, Esquire
1922 F Street, N.W.
Washington, D.C. 20006-4387

RE: MUR 2989
National Association of Life Underwriters Political Action Committee and Bruce C. Hendrickson, as treasurer

Dear Mr. Kerley:

On July 10, 1990, your clients were notified that the Federal Election Commission found reason to believe that National Association of Life Underwriters Political Action Committee and Bruce C. Hendrickson, as treasurer, violated 2 U.S.C. § 441a(a). On July 31, 1990, you submitted a response to the Commission's reason to believe finding and requested that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe. On July 30, 1990, you submitted a request for preprobable cause conciliation.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to decline to enter into conciliation prior to a finding of probable cause to believe and to instead take no further action against National Association of Life Underwriters Political Action Committee and Bruce C. Hendrickson, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a contribution made after a primary election may be designated for the primary election only to the extent that the contribution does not exceed net debts outstanding from the primary election. Your clients should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351157749

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Robert E. McKew, Esquire
Assistant General Counsel
American Financial Services Association
1101 Fourteenth Street, N.W.
Washington, D.C. 20005

RE: MUR 2989
American Financial Services Association Political Action Committee and Thomas L. Thomas, as treasurer

Dear Mr. McKew:

On July 10, 1990, American Financial Services Association Political Action Committee and Thomas L. Thomas, as treasurer, were notified that the Federal Election Commission found reason to believe that American Financial Services Association Political Action Committee and Thomas L. Thomas, as treasurer, violated 2 U.S.C. § 441a(a). On July 25, 1990, you submitted a response to the Commission's reason to believe finding and requested that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to decline to enter into conciliation prior to a finding of probable cause to believe and to instead take no further action against American Financial Services Association Political Action Committee and Thomas L. Thomas, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a political committee must properly report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2. You should take immediate steps to insure that all contributions are properly reported in the future.

If you have any questions, please contact Elizabeth Campbell, 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 ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

J. David Dyson, Esquire
P.O. Box 2210
Atlanta, GA 30301

RE: MUR 2989
Gold Kist Political
Action for Farmers, Inc.,
and Paul G. Brower, as
treasurer

Dear Mr. Dyson:

On July 10, 1990, your clients were notified that the Federal Election Commission found reason to believe that Gold Kist Political Action for Farmers, Inc., and Paul G. Brower, as treasurer, violated 2 U.S.C. § 441a(a). On July 18, 1990, you submitted a response to the Commission's reason to believe finding and requested that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to decline to enter into conciliation prior to a finding of probable cause to believe and to instead take no further action against Gold Kist Political Action for Farmers, Inc., and Paul G. Brower, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a political committee must properly report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2. Your clients should take immediate steps to insure that all contributions are properly reported in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351557553

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 21, 1991

Mr. Roman Rice, Treasurer
Public Service Political
Action Committee
1761 Business Center Dr.
Suite 230
Reston, VA 22090

RE: MUR 2989
Public Service Political
Action Committee and Roman K.
Rice, as treasurer

Dear Mr. Rice:

On July 10, 1990, Public Service Political Action Committee and you, as treasurer, were notified that the Federal Election Commission found reason to believe that Public Service Political Action Committee and you, as treasurer, violated 2 U.S.C. § 441a(a). On July 24, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to take no further action against Public Service Political Action Committee and you, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a multicandidate committee is prohibited from making contributions to a candidate for federal office or his authorized committees in excess of $5,000 in any election. You should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351575 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Ms. Nancy C. O'Connor, Treasurer
Bankers Trust Company
P.O. Box 318, Church Street Station
New York, N.Y. 10008

RE: MUR 2989
Bankers Trust New York Corporation Political Action Committee and Nancy C. O'Connor, as treasurer

Dear Ms. O'Connor:

On July 10, 1990, Bankers Trust New York Corporation Political Action Committee and you, as treasurer, were notified that the Federal Election Commission found reason to believe that Bankers Trust New York Corporation Political Action Committee and you, as treasurer, violated 2 U.S.C. § 441a(a). On July 20, 1990, you submitted a response to the Commission's reason to believe finding and requested that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to decline to enter into conciliation prior to a finding of probable cause to believe and to instead take no further action against Bankers Trust New York Corporation Political Action Committee and you, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a political committee must properly report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2. You should take immediate steps to insure that all contributions are properly reported in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351575 7

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

May 21, 1991

Ellenore O'Hanrahan, Esquire
The Dun & Bradstreet Corporation
299 Park Avenue
23rd Floor
New York, N.Y. 10171

RE: MUR 2989
Political Action Committee
of the Dun & Bradstreet
Corporation and Philip C.
Danford, as treasurer

Dear Ms. O'Hanrahan:

On July 10, 1990, your clients were notified that the Federal Election Commission found reason to believe that Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer, violated 2 U.S.C. § 441a(a). On July 17, 1990, you submitted a response to the Commission's reason to believe finding and requested that the Commission enter into conciliation negotiations prior to a finding of probable cause to believe. On July 27, 1990, we received a request for preprobable cause conciliation.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to decline to enter into conciliation prior to a finding of probable cause to believe and to instead take no further action against Political Action Committee of the Dun & Bradstreet Corporation and Philip C. Danford, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a multicandidate committee is prohibited from making contributions to a candidate for federal office or his authorized committees in excess of $5,000 in any election. Your clients should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351557559

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Helen M. Houley, Esquire
United Technologies Corporation
1825 Eye Street, N.W.
Suite 700
Washington, D.C. 20006

RE: MUR 2989
United Technologies Corporation Political Action Committee and Donald E. Groce, as treasurer

Dear Ms. Houley:

On July 10, 1990, your clients were notified that the Federal Election Commission found reason to believe that United Technologies Corporation Political Action Committee and Donald E. Groce, as treasurer, violated 2 U.S.C. § 441a(a). On July 17, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to take no further action against United Technologies Corporation Political Action Committee and Donald E. Groce, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a contribution made after a primary election may be designated for the primary election only to the extent that the contribution does not exceed net debts outstanding from the primary election. Your clients should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351576 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Timothy S. Perry, Esquire
Alston & Bird
One Atlantic Center
1201 West Peachtree Street
Atlanta, GA 30309-3424

RE: MUR 2989
Citizens & Southern Georgia Corporation Better Government Committee I and James D. Dixon, as treasurer

Dear Mr. Perry:

On July 10, 1990, your clients were notified that the Federal Election Commission found reason to believe that Citizens & Southern Georgia Corporation Better Government Committee I and James D. Dixon, as treasurer, violated 2 U.S.C. § 441a(a). On July 27, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to take no further action against Citizens & Southern Georgia Corporation Better Government Committee I and James D. Dixon, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that Commission regulations require that a contribution which exceeds contribution limits when aggregated with other contributions from the same contributor must be redesignated within sixty days of receipt. Contributions exceeding the limitations of the Federal Election Campaign Act not redesignated within sixty days result in a violation of 2 U.S.C. § 441a(a). Your clients should take immediate steps to insure that this activity does not occur in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351576 63

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

James F. Schoener, Esquire
1712 Glenhouse Dr., #315
Sarasota, FL 34231

RE: MUR 2989
Flowers Industries Inc.
Political Action Committee
and Earl Quigg, as treasurer

Dear Mr. Schoener:

On July 10, 1990, your clients were notified that the Federal Election Commission found reason to believe that Flowers Industries, Inc. Political Action Committee and Earl Quigg, as treasurer, violated 2 U.S.C. § 441a(a). On July 26, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to take no further action against Flowers Industries Inc. Political Action Committee and Earl Quigg, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a political committee must properly report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2. Your clients should take immediate steps to insure that all contributions are properly reported in the future.

If you have any questions, please contact Elizabeth Campbell, 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 ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Stephen E. Chaudet, Treasurer
Lockheed Employees Political
Action Committee
4500 Park Granada Blvd.
Calabasas, CA 91399-0610

RE: MUR 2989
Lockheed Employees Political
Action Committee and Stephen
E. Chaudet, as treasurer

Dear Mr. Chaudet:

On July 10, 1990, Lockheed Employees Political Action Committee and you, as treasurer, were notified that the Federal Election Commission found reason to believe that Lockheed Employees Political Action Committee and you, as treasurer, violated 2 U.S.C. § 441a(a). On August 15, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to take no further action against Lockheed Employees Political Action Committee and you, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351577666

The Commission reminds you that a political committee must properly report the election for which a contribution is made in accordance with 11 C.F.R. § 110.2. You should take immediate steps to insure that all contributions are properly reported in the future.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

2304351157567

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 21, 1991

Myles V. Lynk, Esquire
Dewey, Ballantine, Bushby,
Palmer & Wood
1775 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

RE: MUR 2989
A.L. Williams & Associates
Political Action Committee
and Jack Smith, as treasurer

Dear Mr. Lynk:

On July 10, 1990, your clients were notified that the Federal Election Commission found reason to believe that A.L. Williams & Associates Political Action Committee and Jack Smith, as treasurer, violated 2 U.S.C. § 441a(a). On August 1, 1990, you submitted a response to the Commission's reason to believe finding.

After considering the circumstances of the matter, the Commission determined on May 7, 1991, to take no further action against A.L. Williams & Associates Political Action Committee and Jack Smith, as treasurer, and closed the file as it pertains to them. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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The Commission reminds you that a contribution made after a primary election may be designated for the primary election only to the extent that the contribution does not exceed net debts outstanding from the primary election. Your clients should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Elizabeth Campbell, 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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RECEIVED
FEDERAL ELECTION COMMISSION
91 MAY 23 AM 11:37

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2989
Folsom Construction Company	)	
	)	
Pickett, Pickett & Pickett	)	

SENSITIVE

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

Attached is a conciliation agreement which has been signed by Brenda Clements, a representative for Folsom Construction Company. Also attached is a conciliation agreement which has been signed by Will Hays Pickett, Jr., a representative for Pickett, Pickett & Pickett.

The attached agreements contain no changes from the agreements approved by the Commission on March 19, 1991. Folsom Construction Company and Pickett, Pickett & Pickett each submitted a civil penalty check for $500.

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Folsom Construction Company.

2. Close the file as to Folsom Construction Company.

3. Accept the attached conciliation agreement with Pickett, Pickett & Pickett.

4. Close the file as to Pickett, Pickett & Pickett.

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5. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

5/22/91
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
1. Folsom Construction Company Conciliation Agreement
2. Pickett, Pickett & Pickett Conciliation Agreement
3. Photocopies of civil penalty checks

Staff Assigned: Elizabeth Campbell
Mary Taksar

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Folsom Construction Company; Pickett, Pickett & Pickett.	)	MUR 2989

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 28, 1991, the Commission decided by a vote of 4-0 to take the following actions in MUR 2989:

1. Accept the conciliation agreement with Folsom Construction Company, as recommended in the General Counsel's Report dated May 22, 1991.

2. Close the file as to Folsom Construction Company.

3. Accept the conciliation agreement with Pickett, Pickett & Pickett, as recommended in the General Counsel's Report dated May 22, 1991.

(Continued)

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4. Close the file as to Pickett, Pickett & Pickett.

5. Approve the appropriate letters, as recommended in the General Counsel's Report dated May 22, 1991.

Commissioners Aikens, Elliott, Josefiak, and Thomas voted affirmatively for the decision; Commissioners McDonald and McGarry did not cast votes.

Attest:

5-29-91
Date

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

Received in the Secretariat: Thurs., May 23, 1991 11:37 a.m.
Circulated to the Commission: Thurs., May 23, 1991 4:00 p.m.
Deadline for vote: Tues., May 28, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 3, 1991

Will Hays Pickett, Jr.
Pickett, Pickett & Pickett
225 North Main Street
Jasper, GA 30143

RE: MUR 2989
Pickett, Pickett & Pickett

Dear Mr. Pickett:

On May 28, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Pickett, Pickett & Pickett.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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OGC 0968

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2989
Pickett, Pickett & Pickett)

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 Pickett, Pickett & Pickett ("Respondent") violated 2 U.S.C. § 441b(a).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent and the subject matter of this proceeding.

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

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

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

1. Pickett, Pickett & Pickett is a corporation.

2. Friends of Mattingly ("Mattingly Committee") is a political committee within the meaning of 2 U.S.C. § 431(4) and was the principal campaign committee of Mack Mattingly in Georgia's 1986 U.S. Senate Election.

3. Pursuant to 2 U.S.C. § 441b(a), a corporation is prohibited from making any contribution or expenditure to any

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candidate for Federal office in connection with any election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A).

4. On October 22, 1986, Pickett, Pickett & Pickett made a $1,000 contribution to the Mattingly Committee.

V. Respondent made a $1,000 corporate contribution to the Mattingly Committee in violation of 2 U.S.C. § 441b(a).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of five hundred dollars ($500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its 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. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire

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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

Date 4/3/91

FOR THE RESPONDENT:

_____ _____
(Name)
(Position)

Date 4-4-91

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9 3 0 4 3 5 1 5 7 7 9

PICKETT PICKETT & PICKETT ATTORNEYS
A PROFESSIONAL CORPORATION
PHONE 404-692-2494
EDGE BLDG. 225 N. MAIN ST.
JASPER, GA 30143

3990

64-271
611

4-22 19 91

PAY TO THE ORDER OF Federal Election Commission $ 500.00

Five Hundred + 00/100 DOLLARS

PCB PICKENS COUNTY BANK
Jasper, Georgia 30143

FOR Civil Penalty

© HARLAND 1989

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 3, 1991

Ms. Brenda Clements
Folsom Construction Co.
2281 US Hwy. 41 South
Cordele, GA 31015

RE: MUR 2989
Folsom Construction Co.

Dear Ms. Clements:

On May 28, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Folsom Construction Co.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 2989
Folsom Construction Company)

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 Folsom Construction Company ("Respondent") violated 2 U.S.C. § 441b(a).

NOW, THEREFORE, the Commission and the Respondent, 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 Respondent and the subject matter of this proceeding.

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

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

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

1. Folsom Construction Company is a corporation.

2. Friends of Mattingly ("Mattingly Committee") is a political committee within the meaning of 2 U.S.C. § 431(4) and was the principal campaign committee of Mack Mattingly in Georgia's 1986 U.S. Senate Election.

3. Pursuant to 2 U.S.C. § 441b(a), a corporation is prohibited from making any contribution or expenditure to any

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candidate for Federal office in connection with any election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office. 2 U.S.C. § 431(8)(A).

4. On May 28, 1985, Folsom Construction Company made a $1,000 contribution to the Mattingly Committee with a check made payable to "Georgia Tribute to the President."

V. Respondent made a $1,000 corporate contribution to the Mattingly Committee in violation of 2 U.S.C. § 441b(a).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of five hundred dollars ($500), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its 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. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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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 Date
Associate General Counsel

FOR THE RESPONDENT:

Brenda Clements _____
(Name) Date
(Position) Sec

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9 3 0 4 3 5 1 5 7 8 5

Folsom Construction Co.
General Contractor
2281 US HWY 41 SOUTH
(912) 273-6626 • FAX (912) 273-7579
CORDELE, GEORGIA 31015

First State Bank of Cordele
Cordele, Georgia 31015

64-1154
612

No. 012142

Five hundred Dollars & 00/100----------	DATE	CHECK NO.	PAYEE I.D.
	5-1-91	[redacted]	[redacted]

PAY THIS AMOUNT
$500.00[redacted]

PAY TO THE ORDER OF Federal Election Commission

Folsom Construction Co.

Brenda Clements
AUTHORIZED SIGNATURE

Reorder No. 133857 - Murray Printing Company

The Prudential

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 JUN 10 AM 11:18

John E. De[illegible], CLU, FLMI
Assistant General Counsel
Law Department

The Prudential Insurance Company of America
Prudential Plaza, Newark, NJ 07101
201 802-8940

06C1483

June 4, 1991

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

91 JUN 10 PM 3:12

Elizabeth Campbell, Esq.
Law Department
Federal Election Commission
Washington, DC 20463

Re: **MUR 2989**
PRUDENTIAL INSURANCE COMPANY OF AMERICA POLITICAL ACTION COMMITTEE AND MILAN E. JOHNSON, AS TREASURER

Dear Ms. Campbell:

I am in receipt of Lois G. Lerner, Esq.'s letter of May 21, 1991 on behalf of Lawrence M. Noble, General Counsel of the Federal Election Commission regarding the referenced matter.

I am no longer responsible for legal matters in this area, so I have forwarded your materials to the attorney who has succeeded me in that assignment.

He is currently in the process of following up with our business clients for the preparation of a proper response.

Therefore, you should expect a substantive response from James Gallagher in keeping with the time frame mentioned in Ms. Lerner's letter. However, if there are any problems of follow up contact you should of course feel free to contact me directly as well as Mr. Gallagher.

If you desire or it is required that a substitute power of attorney be executed formally confirming Mr. Gallagher's assumptions of these responsibilities on behalf of the cited parties, please let us know at your earliest convenience so that we may execute the appropriate documentation.

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Thank you very much.

Very truly yours,

John DeWald

John E. DeWald
Assistant General Counsel

JED/vdm
Info. cc: James D. Gallagher, Esq.
Assistant General Counsel

Lois G. Lerner, Esq.
Associate General Counsel

9304351578 7

MUR 1606

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, D.C. 20005-2107
(202) 371-7000

FAX (202) 393-5760
DIRECT DIAL (202) 371-

BOSTON
BRUSSELS
CHICAGO
HONG KONG
LONDON
LOS ANGELES
NEW YORK
SAN FRANCISCO
SYDNEY
TOKYO
TORONTO
WILMINGTON

June 18, 1991

VIA FAX AND REGULAR MAIL

Lawrence M. Noble, Esq.
Federal Election Commission
999 E Street, Northwest
Washington, D.C. 20463
Attn: Elizabeth Campbell

Re: MUR 2989
Textron Inc. Political Action Committee
and Gary E. Atwell, as Treasurer

Dear Mr. Noble:

Today, June 18, 1991, I was asked to represent Textron Inc. Political Action Committee and Gary E. Atwell, as Treasurer, in the above referenced MUR. A Statement of Designation of Counsel is being sent under separate cover. Because I will be out of town for the remainder of the week, and need time to review this matter before preparing a response, I request a 20 day extension of time to respond to your May 21, 1991 letter and proposed conciliation agreement. If the extension is granted, I believe the response will be due on July 15, 1991.

Thank you for your consideration of this request.

Sincerely,

Kenneth A. Gross

Kenneth A. Gross

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RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
91 JUN 19 PM 3:13

RECEIVED
FEDERAL ELECTION COMMISSION
91 JUN 19 AM 9:39

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 20, 1991

Kenneth A. Gross, Esq.
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington, D.C. 20005-2107

RE: MUR 2989
Textron Inc. Political
Action Committee and
Gary E. Atwell, as
treasurer

Dear Mr. Gross:

This is in response to your letter dated June 18, 1991, requesting an extension of twenty days to respond to the Commission's preprobable cause conciliation agreement. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on July 15, 1991.

If you have any questions, please contact Elizabeth Campbell, 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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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 JUN 21 AM 11:09

TEXTRON

Textron Inc.

40 Westminster Street
Providence, R.I. 02903
401/421-2800

91 JUN 21 PM 3:51

June 18, 1991

VIA TELECOPIER
202-376-5280

Federal Election Commission
999 E. Street N.W.
Washington, DC 20463
Attention: Elizabeth Campbell

RE: MUR 2989

Textron Inc. PAC and Gary E.
Atwell as Treasurer

Enclosed please find executed Statements of Designation of Counsel from the above respondents in MUR 2989, signed by me as counsel for each of such respondents.

Very truly yours,

Thomas L. Kraig, Jr.
Group Counsel

A987/FTLK.DLY

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Kenneth A. Gross

ADDRESS: Skadden, Arps, et. al.
1440 New York Avenue, N.W.
Washington, D.C. 20005

TELEPHONE: 202/371-7000

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.

June 18, 1991
Date

Textron Inc.
Political Action Committee
By: Thomas L. Kraus Jr.
Signature Counsel

RESPONDENT'S NAME: Textron Inc. Political Action Committee

ADDRESS: 40 Westminster Street
Providence, RI 02903

HOME PHONE:

BUSINESS PHONE: (401) 421-2800

9304351579 21

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2989

NAME OF COUNSEL: Kenneth A. Gross

ADDRESS: Skadden, Arps, et. al.
1440 New York Avenue, N.W.
Washington, D.C. 20005

TELEPHONE: 202/371-7000

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.

June 18, 1991
Date

Gary E. Atwell
By: Thomas L. Kraft
Signature Counsel

RESPONDENT'S NAME: Gary E. Atwell

ADDRESS: 133 Indian Cove Road
Ridgefield, CT 06877

HOME PHONE:

BUSINESS PHONE: (401) 457-2480

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RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

91 JUN 27 PM 4:44

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	**SENSITIVE**
	)	
Prudential Insurance Company of America Political Action Committee and Samuel T. Piscitelli, as treasurer	)	MUR 2989

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

Attached is a conciliation agreement which has been signed by Samuel T. Piscitelli, treasurer of Prudential Insurance Company of America Political Action Committee.

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II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Prudential Insurance Company of America Political Action Committee and Samuel T. Piscitelli, as treasurer.

2. Close the file as to Prudential Insurance Company of America Political Action Committee and Samuel T. Piscitelli, as treasurer.

3. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

June 26, 1991
Date

BY: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachments
1. Prudential Insurance Company PAC Conciliation Agreement

Staff Assigned: Elizabeth Campbell
Mary Taksar

29043515794

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Prudential Insurance Company of America Political Action Committee and Samuel T. Piscitelli, as treasurer.	)	MUR 2989

CERTIFICATION

I, Marjorie W. Emmon, Secretary of the Federal Election Commission, do hereby certify that on July 2, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 2989:

1. Accept the conciliation agreement with Prudential Insurance Company of America Political Action Committee and Samuel T. Piscitelli, as treasurer, as recommended in the General Counsel's Report dated June 26, 1991.

2. Close the file as to Prudential Insurance Company of America Political Action Committee and Samuel T. Piscitelli, as treasurer.

(continued)

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3. Approve the letters, as recommended in the General Counsel's Report dated June 26, 1991.

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

Attest:

July 2, 1991
Date

Delores Harris
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thursday, June 27, 1991 4:44 p.m.
Circulated to the Commission: Friday, June 28, 1991 11:00 a.m.
Deadline for vote: Tuesday, July 2, 1991 11:00 a.m.

dh

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1991

James D. Gallagher, Esq.
Assistant General Counsel
The Prudential Insurance Company of America
751 Broad Street
Newark, NJ 07102-3777

RE: MUR 2989
Prudential Insurance
Company of America
Political Action Committee
and Samuel T. Piscitelli,
as treasurer

Dear Mr. Gallagher:

On July 2, 1991, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of Prudential Insurance Company of America Political Action Committee and Samuel T. Piscitelli, as treasurer, in settlement of a violation of 2 U.S.C. § 441a(a), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to the Prudential Insurance Company of America Political Action Committee and Samuel T. Piscitelli, as treasurer.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

9304351157927

Enclosed you will find a copy of the fully executed conciliation agreement for your files. I remind you that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact Elizabeth Campbell, the attorney assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

2304351579 98

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2989
Prudential Insurance Company of America Federal PAC and Samuel T. Piscitelli, as treasurer	)	

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 reason to believe that Prudential Insurance Company of America Federal PAC and Samuel T. Piscitelli, as treasurer, ("Respondents") violated 2 U.S.C. § 441a(a).

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

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

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

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

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

1. Prudential Insurance Company of America Federal PAC is a multicandidate political committee within the meaning of 2 U.S.C. § 441a(a).

2. Samuel T. Piscitelli is the treasurer of Prudential Insurance Company of America Federal PAC.

3. The Friends of Mattingly ("Mattingly Committee") was an authorized political committee of Mack Mattingly within the meaning of 2 U.S.C. § 431(6).

4. The Federal Election Campaign Act of 1971, as amended ("the Act") states that no multicandidate political committee may make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceeds $5,000. 2 U.S.C. § 441a(a)(2)(A). The term "election" means a general, special, primary, or runoff election. 2 U.S.C. § 431(1). The term "multicandidate political committee" means a political committee which has been registered under 2 U.S.C. § 433 for six or more months which has received contributions from more than 50 persons and except for a State political party organization, has made contributions to five or more Federal candidates. 2 U.S.C. § 441a(a)(4).

5. Commission regulations state that in the case of a contribution designated for a particular election, "with respect to any election" means the election designated. 11 C.F.R. 110.1(a)(2) (1976). Commission regulations state that undesignated contribution made on the date of or before a primary are primary contributions. Id. Commission regulations also state

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that an undesignated contribution made after the primary is a general election contribution. Id. The regulations governing this case are those in effect at the time the contributions were made and received.

6. From October 1983 through October 1986, Prudential made contributions totaling $7,500 to the Mattingly Committee. Prudential's contributions to the Mattingly Committee are as follows: $500 on October 27, 1983; $5,000 on March 20, 1985; $1,000 on May 1, 1986; and $1,000 on October 24, 1986. All of these contributions were undesignated.

7. The primary for the U.S. Senate Election in Georgia was held on August 12, 1986.

8. The October 27, 1983, March 20, 1985, and May 1, 1986 contributions are considered primary contributions because pursuant to 11 C.F.R. § 110.1(a)(2), undesignated contributions made before a primary are primary contributions. The October 24, 1986 contribution is considered a general election contribution because pursuant to 11 C.F.R. 110.1(a)(2), undesignated contributions made after the primary are general election contributions.

9. Prudential had made an aggregate of $6,500 in primary contributions and and an aggregate of $1,000 in general election contributions. Prudential exceeded its primary contribution limit by $1,500.

V. Respondents exceeded their primary contribution limit by $1,500, in violation of 2 U.S.C. § 441a(a).

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VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of three hundred and seventy five dollars ($375), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its 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.

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

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ _____
Lois G. Lerner
Associate General Counsel

Date 7/5/91

FOR THE RESPONDENTS:

Samuel T. Piscitelli _____
(Name) Samuel T. Piscitelli
(Position) Treasurer

Date 6/12/91

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THE PRUDENTIAL INSURANCE CO.
OF AMERICA
FEDERAL POLITICAL ACTION COMMITTEE
NEWARK, NJ 07101

930435158O4 2497

55 2/212

June 17 19 91

PAY
TO THE
ORDER OF *****Federal Election Commission***** $ 375.00

THE SUM 375 DOLS 00 CTS DOLLARS

FIRST FIDELITY BANK, n.a. New Jersey
765 Broad Street Office 397
765 Broad Street
Newark, N.J. 07101

FOR "MUR 2989"

S. Prudential

⑈002497⑈ ⑆021200025⑆ 200 34304 5⑈

N·A·L·U

The National Association of Life Underwriters

1922 F Street, N.W. • Washington, DC 20006-4387 • (202) 331-6000 • FAX (202) 331-2179

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 JUL 30 AM 10:47

91 JUL 31 AM 11:21

July 24, 1991

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
Washington, DC 20463

Re: MUR 2989, National Association of Life Underwriters Political Action Committee and Bruce C. Hendrickson, as Treasurer

Dear Mr. Noble:

Thank you for your letter of May 21, 1991 advising me that the Commission will "take no further action against National Association of Life Underwriters Political Action Committee and Bruce C. Hendrickson, as treasurer," and that the Commission has "closed the file as it pertains to them." We did not have any factual or legal material that we wished to submit for the public record, and so we did not get back to you within 10 days of receipt of your letter.

We appreciate the fact that the file will remain confidential until the entire matter is closed. We will look forward to being notified when it is in fact closed. In the meantime, we do not wish to waive confidentiality on this matter.

Sincerely,

Michael L. Kerley
Vice President
Government Affairs

MLK:les

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SECRETARIAT
91 AUG 27 AM 10: 25

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2989
Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer	)	**SENSITIVE**

GENERAL COUNSEL'S REPORT

I. **BACKGROUND**

Attached is a conciliation agreement which has been signed by counsel for Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer.

The attached agreement contains no changes from the agreement approved by the Commission on July 22, 1991. A check in the amount of $250 to cover the civil penalty has been received by the Commission.

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer.

2. Close the file as to these respondents.

3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

8-26-91
Date

BY: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachments
1. Conciliation Agreement
2. Photocopy of civil penalty check

Staff Assigned: Elizabeth Campbell

9304335158006

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer.	)	MUR 2989
	)	
	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 29, 1991, the Commission decided by a vote of 5-0 to take the following actions in MUR 2989:

1. Accept the conciliation agreement with Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer, as recommended in the General Counsel's Report dated August 26, 1991.

2. Close the file as to these respondents.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated August 26, 1991.

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

Attest:

8-30-91
Date

for Delores Harris
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., Aug. 27, 1991, 10:25 a.m.
Circulated to the Commission: Tues., Aug. 27, 1991, 4:00 p.m.
Deadline for vote: Thurs., Aug. 29, 1991, 4:00 p.m.

bjf

9304351580 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 6, 1991

Richard Moe, Esquire
Paul B. Nolan, Esquire
Davis Polk & Wardwell
1300 I Street, N.W.
Washington, D.C. 20005

RE: MUR 2989
Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer

Dear Messrs Moe and Nolan:

On August 29, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your client's behalf in settlement of a violation of 2 U.S.C. § 441a(a), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Elizabeth Campbell, the attorney assigned to this matter, at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

29043515809

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 2989
Morgan Companies Political	)	
Action Committee and	)	
Cory N. Strupp, as treasurer	)	

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 reason to believe that Morgan Companies Political Action Committee and Cory N. Strupp, as treasurer, ("Respondents") violated 2 U.S.C. § 441a(a).

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

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

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

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

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

1. Morgan Companies Political Action Committee ("MorganPAC") is a multicandidate political committee within the meaning of 2 U.S.C. § 441a(a).

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2. Cory N. Strupp is the treasurer of Morgan Companies Political Action Committee.

3. The Friends of Mattingly ("Mattingly Committee") was an authorized political committee of Mack Mattingly within the meaning of 2 U.S.C. § 431(6).

4. The Federal Election Campaign Act of 1971, as amended ("the Act") states that no multicandidate political committee may make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceeds $5,000. 2 U.S.C. § 441a(a)(2)(A). The term "election" means a general, special, primary, or runoff election. 2 U.S.C. § 431(1). The term "multicandidate political committee" means a political committee which has been registered under 2 U.S.C. § 433 for six or more months which has received contributions from more than 50 persons and except for a State political party organization, has made contributions to five or more Federal candidates. 2 U.S.C. § 441a(a)(4).

5. Commission regulations state that in the case of a contribution designated for a particular election, "with respect to any election" means the election designated. 11 C.F.R. § 110.1(a)(2) (1976). Commission regulations state that undesignated contribution made on the date of or before a primary are primary contributions. Id. Commission regulations also state that an undesignated contribution made after the primary is a general election contribution. Id. The regulations governing this case are those in effect at the time the contributions were

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made and received.

6. From October 1983 through September 1986, MorganPAC made contributions totaling $10,000 to the Mattingly Committee. MorganPAC's contributions are as follows: $500 on October 5, 1983; $1,000 on January 30, 1985; $5,000 on March 14, 1986; $1,000 on April 21, 1986; and $2,500 on September 17, 1986. MorganPAC designated only one contribution, $5,000, made on March 14, 1986. In a letter accompanying the contribution check to the Mattingly Committee, MorganPAC stated that $3,500 was designated for the primary and $1,500 was designated for the general election. The other four contributions were undesignated.

7. The portion of the March 14, 1984 contribution designated for the primary election aggregated with the prior contributions described above exhausted MorganPAC's eligibility to contribute to Mattingly's 1986 primary election, as the total amount was $5,000. Upon receiving the undesignated April 21, 1986 contribution of $1,000, the Mattingly Committee reported this amount as a contribution to the general election. However, Commission regulations state that undesignated contributions made before the primary are considered to be contributions to the primary election unless specifically designated in writing for the general election. 11 C.F.R. § 110.1(a)(2).

8. The primary for the U.S. Senate Election in Georgia was held on August 12, 1986.

9. The October 5, 1985, January 30, 1985, and April 21, 1986 contributions are considered primary contributions

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because pursuant to 11 C.F.R. § 110.1(a)(2), undesignated contributions made before a primary are primary contributions. The September 17, 1986 contribution is considered a general election contribution because pursuant to 11 C.F.R. 110.1(a)(2), undesignated contributions made after the primary are general election contributions.

10. Under the attribution rules established in Commission regulations, MorganPAC had made an aggregate of $6,000 in primary contributions and an aggregate of $4,000 in general election contributions. Thus, MorganPAC exceeded its primary contribution limit by $1,000.

V. Under the attribution rules established in Commission regulations, Respondents exceeded their aggregate primary contribution limit by $1,000, in violation of 2 U.S.C. § 441a(a).

VI. Respondents contend that they did not knowingly and willfully violate 2 U.S.C. § 441a(a).

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of two hundred and fifty dollars ($250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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that all parties hereto have executed same and the Commission has approved the entire agreement.

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ 9/6/91
Lois G. Lerner
Associate General Counsel
Date

FOR THE RESPONDENTS:

_____ Sept. 15, 1991
(Name)
(Position)
Date

9304355-5814

9 3 0 4 3 5 1 5 8 1 5

THE MORGAN COMPANIES POLITICAL ACTION COMMITTEE
60 WALL STREET
NEW YORK, NY 10260

825

August 20, 1991

1-23/210

Pay to the order of Federal Election Commission $ 250.00

Two hundred fifty and 00/100 ---------- Dollars

JPMorgan Morgan Guaranty Trust Company of New York

Memo MUR2989

⑈000008 25⑈ ⑆021000238⑆ 000 23 74 2⑈

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F.E.C.
SECRETARIAT
91 NOV 13 PM 2:09

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
Textron Inc. Political Action Committee) MUR 2989
and Gary E. Atwell, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Kenneth A. Gross, counsel for Textron Inc. Political Action Committee ("Textron Inc. PAC") and its treasurer, Gary E. Atwell.

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Based on the foregoing, this Office recommends that the Commission accept the proposed conciliation agreement submitted by Textron Inc. Political Action Committee and its treasurer, Gary E. Atwell and close the file as it pertains to these respondents.

II. **RECOMMENDATIONS**

1. Accept the attached conciliation agreement with Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer.

2. Close the file as it pertains to Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer.

3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

11-15-91
Date

BY: _____
Lois G. Lerner
Associate General Counsel

Attachments
1. Proposed conciliation agreement
2. Photocopy of civil penalty check

Staff Assigned: Mary Taksar

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer.	)	MUR 2989

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 20, 1991, the Commission decided by a vote of 6-0 to take the following actions in MUR 2989:

1. Accept the conciliation agreement with Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer, as recommended in the General Counsel's Report dated November 15, 1991.

2. Close the file as it pertains to Textron Inc. Political Action Committee and Gary E. Atwell, as treasurer.

3. Approve the appropriate letter, as recommended in the General Counsel's Report dated November 15, 1991.

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

Attest:

11-20-91
Date

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., Nov. 18, 1991 2:09 p.m.
Circulated to the Commission: Mon., Nov. 18, 1991 4:00 p.m.
Deadline for vote: Wed., Nov. 20, 1991 4:00 p.m.

dr

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 25, 1991

Kenneth A. Gross, Esq.
Skadden, Arps, Slate, Meagher & Flom
1440 New York Avenue, N.W.
Washington D.C. 20005-2107

RE: MUR 2989
Textron Political Action Committee
and its treasurer

Dear Mr. Gross:

On November 20, 1991, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your clients' behalf in settlement of a violation of 2 U.S.C. § 441a(a), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to your clients.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. 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.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any questions, please contact Mary Taksar, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

2304351 5820

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Textron Inc. Political Action Committee and its Treasurer	)	MUR 2989
	)	

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 reason to believe that Textron Inc. Political Action Committee and its treasurer ("Respondents") violated 2 U.S.C. § 441a(a).

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

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

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

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

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

1. Textron Inc. Political Action Committee ("Textron PAC") is a multicandidate political committee within the meaning of 2 U.S.C. § 441a(a).

2. Gary E. Atwell is the treasurer of Textron Inc. PAC.

3. The Friends of Mattingly ("Mattingly Committee") was an authorized political committee of Mack Mattingly within the meaning of 2 U.S.C. § 431(6).

4. The Federal Election Campaign Act of 1971, as amended ("the Act") states that no multicandidate political committee may make contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceeds $5,000. 2 U.S.C. § 441a(a)(2)(A). The term "election" means a general, special, primary, or runoff election. 2 U.S.C. § 431(1). The term "multicandidate political committee" means a political committee which has been registered under 2 U.S.C. § 433 for six or more months which has received contributions from more than 50 persons and except for a State political party

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organization, has made contributions to five or more Federal candidates. 2 U.S.C. § 441a(a)(4).

5. The regulations governing this case are those in effect at the time the contributions were made and received.

6. Commission regulations state that in the case of a contribution designated for a particular election, "with respect to any election" means the election designated. 11 C.F.R. § 110.1(a)(2) (1976). Commission regulations state that undesignated contributions made on the date of or before a primary are primary contributions. Id. Commission regulations also state that an undesignated contribution made after the primary is a general election contribution. Id.

7. At the time the contributions in this matter were made, the Commission's regulation at 11 C.F.R. § 102.9(e) stated that "if the candidate, or his or her authorized committee(s), receives contributions prior to the date of the primary election, which contributions are designated by the candidate or his or her authorized committee(s) for use in connection with the general election, such candidate or such committees shall use an acceptable accounting method to distinguish between con-

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tributions received for the primary election and contributions received for the general election."

In 1987, 11 C.F.R. § 102.9(e) was amended to clarify that contributions may be designated for particular elections only by contributors, and cannot be designated by the recipient candidates or their campaign committees. Explanation and Justification for 11 C.F.R. § 102.9(e), 52 Fed. Reg. 760 (1987).

8. From March 15, 1982 through June 3, 1986, Textron PAC made contributions totaling $9,500 to the Mattingly Committee. Textron PAC's contributions are as follows: $1,000 on March 15, 1982; $1,000 on September 29, 1983; $1,000 on March 14, 1985; $1,000 on June 19, 1985; $1,000 on July 24, 1985; $2,000 on April 29, 1986; and $2,500 on June 3, 1986. All contributions were undesignated.

9. The primary for the U.S. Senate Election in Georgia was held on August 12, 1986.

10. The six contributions are all considered primary contributions because pursuant to 11 C.F.R. § 110.1(a)(2), undesignated contributions made before a primary are primary contributions.

11. Textron PAC had made an aggregate of $9,500 in primary contributions. Textron PAC exceeded

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its primary aggregate limit by $4,500.

12. Respondents contend that they did not knowingly and willfully exceed the primary contribution limit because under the language of 11 C.F.R. § 102.9(e) in effect at the time the contributions were made, the Mattingly Committee designated the contributions in excess of the $5,000 primary contribution limit as general election contributions.

V. Respondents exceeded its aggregate primary contribution limit by $4,500, in violation of 2 U.S.C. § 441a(a).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of seven hundred and fifty dollars ($750) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that Section VI 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.

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

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

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: _____ 11/25/91
Lois G. Lerner Date
Associate General Counsel

FOR THE RESPONDENTS:

BY: _____ 11/8/91
Kenneth A. Gross Date
Attorney for Textron PAC
and its treasurer

2304351 58826



SKADDEN, ARPS, SLATE
MEAGHER & FLOM
1440 NEW YORK AVENUE, N.W.
WASHINGTON, DC 20005

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2823

68-7279/2560
70

November 7 1991

PAY TO THE ORDER OF Federal Election Commission $ 750.00

Seven Hundred Fifty and no/100 DOLLARS

PERPETUAL
Perpetual Savings Bank, F.S.B.
Virginia, Maryland, Washington, D.C.

FOR

Barbara Perry

"002823" 1:256072798: 00656314"

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 2989

DATE FILMED 11-30-93 CAMERA NO. 2

CAMERAMAN Jmk

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

✓ Microfilm

_____ Public Rcds

_____ Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 2989.

12/10/93

93043542164

THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS

FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report. See Reel 354, pages 1590-94.

2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System. See Reel 354, pages 1595-1620.

3. Certification of Commission vote, dated April 28, 1993. See Reel 354, pages 1621-22.

4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993. See Reel 354, pages 1623-1740.

5. Certification of Commission vote, dated December 9, 1993. See Reel 354, pages 1741-1746.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Jan Witold Baran, Esq.
Wiley Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2989
John Treacy Beyer
Marion R. Buisson
Frank F. Dineen
Carol Falcone
Jacob S. Jernigen
Claire A. King
George A. Martonik
Jane A. Miller
R. Danny Murray
W. A. Orender
Bryce Peterson
John M. Roig
Dennis Schecter
Richard Walker
Harlen Zeitler

Dear Mr. Baran:

On July 20, 1990, your clients were notified that the Federal Election Commission had found reason to believe they had violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against your clients. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Charles L. Sparkman, Esq.
Oliver Maner & Gray
218 State St., P.O. Box 10186
Savannah, GA 31412

RE: MUR 2989
M. C. Anderson

Dear Mr. Sparkman:

On July 20, 1990, your client, M. C. Anderson, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against M. C. Anderson. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Robert M. Friedman, Esq.
Friedman & Sissman, P.C.
100 N. Main Bldg., Suite 3010
Memphis, TN 38103-5015

RE: MUR 2989
Kenneth W. Anderton

Dear Mr. Friedman:

On July 20, 1990, your client, Kenneth W. Anderton, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Kenneth W. Anderton. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Stanley H. Hackett, Esq.
Troutman, Sanders, Lockerman & Ashmore
Candler Bldg., Suite 1400
127 Peachtree St., N.E.
Atlanta, GA 30303-1810

RE: MUR 2989
J. E. Barrow

Dear Mr. Hackett:

On July 20, 1990, your client, J. E. Barrow, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against J. E. Barrow. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354217O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John W. Gibson, Esq.
Hall, Towill, Norman & Barrett
P.O. Box 1564
Augusta, GA 30913

RE: MUR 2989
Clayton P. Boardman, Jr.

Dear Mr. Gibson:

On July 20, 1990, your client, Clayton P. Boardman, Jr., was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Clayton P. Boardman, Jr.. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Carl Bolch, Jr.
P.O. Box 105035
Atlanta, GA 30348

RE: MUR 2989
Carl Bolch, Jr.

Dear Mr. Bolch:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Ron Bloomingkemper
10203 Birchridge Dr., Suite W
Humble, TX 77338

RE: MUR 2989
Ron Bloomingkemper

Dear Mr. Bloomingkemper:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Michael V. Coleman, Esq.
Trotter Smith & Jacobs
400 Colony Square
1201 Peachtree Street
Atlanta, GA 30361

RE: MUR 2989
R. M. Channell

Dear Mr. Coleman:

On July 20, 1990, your client, R. M. Channell, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against R. M. Channell. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

J. Donald Childress
Childress Klein Properties
999 Peachtree St., N.E., Suite 2000
Atlanta, GA 30309

RE: MUR 2989
J. Donald Childress

Dear Mr. Childress:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John A. Conant
2902 Rivermeade Dr., N.W.
Atlanta, GA 30327

RE: MUR 2989
John A. Conant

Dear Mr. Conant:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Walter L. Conner
4129 Diplomat Plaza
Fort Wayne, IN 46806

RE: MUR 2989
Walter L. Conner

Dear Mr. Conner:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Claude P. Cook
Cook and Company
P.O. Box 806
Hazelhurst, GA 31539

RE: MUR 2989
Cook and Company

Dear Mr. Cook:

On July 20, 1990, Cook and Company was notified that the Federal Election Commission had found reason to believe Cook and Company violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Cook and Company. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Charles W. Miller, Esq.
Davidson, Calhoun & Miller, P.C.
The Joseph House
828 Broadway
Columbus, GA 31994-1599

RE: MUR 2989
Lovick P. Corn

Dear Mr. Miller:

On July 20, 1990, your client, Lovick P. Corn, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Lovick P. Corn. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Thomas G. Cousins
2500 Windy Ridge Parkway, Suite 1600
Marietta, GA 30067

RE: MUR 2989
Thomas G. Cousins

Dear Mr. Cousins:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Stephen T. LaBriola, Esq.
Hurt, Richardson, Garner, Todd & Cadenhead
1400 Peachtree Place Tower
999 Peachtree St., N.E.
Atlanta, GA 30309-3999

RE: MUR 2989
Theresa C. Crossland

Dear Mr. LaBriola:

On July 20, 1990, Theresa C. Crossland was notified that the Federal Election Commission had found reason to believe she violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Theresa C. Crossland. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Lloyd H. Darby, III
310 Jackson Street
Vidalia, GA 30474

RE: MUR 2989
Lloyd H. Darby, III

Dear Mr. Darby:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Eugene B. Dawson
P.O. Box 1086
Savannah, GA 31498-2101

RE: MUR 2989
Eugene B. Dawson

Dear Mr. Dawson:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

J. Roy Duggan
118 Cater St.
St. Simons Island, GA 31522

RE: MUR 2989
J. Roy Duggan

Dear Mr. Duggan:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

William A. Fickling, Jr.
P.O. Box 209
Macon, GA 31298

RE: MUR 2989
William A. Fickling, Jr.

Dear Mr. Fickling:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Thomas J. Halpin
648 Marydell Dr.
West Chester, PA 19380

RE: MUR 2989
Thomas J. Halpin

Dear Mr. Halpin:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Thomas S. Hartzog
Box 80728
Atlanta, GA 03066

RE: MUR 2989
Thomas S. Hartzog

Dear Mr. Hartzog:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Melita E. Hayes
3645 Nancy Creek Rd., N.W.
Atlanta, GA 30327

RE: MUR 2989
Melita E. Hayes

Dear Ms. Hayes:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Mark D. Hurst
2929 Thompson Mill Road
Gainesville, GA 30506

RE: MUR 2989
Mark D. Hurst

Dear Mr. Hurst:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Susan D. Hurst
2929 Thompson Mill Road
Gainesville, GA 30506

RE: MUR 2989
Susan D. Hurst

Dear Ms. Hurst:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354219O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

A. Jalil
250 Dogwood Lane
Elberton, GA 30635

RE: MUR 2989
A. Jalil

Dear Mr. Jalil:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEC 10 1993

John B. Keeble
250 Piedmont Ave., Ste 1900
Atlanta, GA 30365

RE: MUR 2989
John B. Keeble

Dear Mr. Keeble:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Charles E. Campbell, Esq.
Hicks, Maloof & Campbell
Suite 2200, Marquis Two Tower
285 Peachtree Center Ave., N.E.
Atlanta, GA 30303-1234

RE: MUR 2989
Eugene Kelly

Dear Mr. Campbell:

On July 20, 1990, Eugene Kelly was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Eugene Kelly. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

P. S. Knox, Jr.
Route 3, Box 129
Thomson, GA 30824

RE: MUR 2989
P. S. Knox, Jr.

Dear Mr. Knox:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John M. Hewson, III, Esq.
Hunter, Maclean, Exley & Dunn, P.C.
P.O. Box 9848
Savannah, GA 31412-0048

RE: MUR 2989
Andrew Gay Labrow

Dear Mr. Hewson:

On July 20, 1990, Andrew Gay Labrow was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Andrew Gay Labrow. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Willard Lasseter
Lasseter Tractor Co., Inc.
P.O. Box 726
Moultrie, GA 31776

RE: MUR 2989
Willard Lasseter

Dear Mr. Lasseter:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

C. M. Leger
674 Hatley Road
Cordele, GA 31015

RE: MUR 2989
C. M. Leger

Dear Mr. Leger:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Ronald S. Leventhal
353 Woodlawn Drive
Marietta, GA 30067

RE: MUR 2989
Ronald S. Leventhal

Dear Mr. Leventhal:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEC 10 1993

Charles A. Lotz, Jr.
725 Tanglewood Trail
Atlanta, GA 30327

RE: MUR 2989
Charles A. Lotz, Jr.

Dear Mr. Lotz:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Frank Love, Jr., Esq.
Powell, Goldstein, Frazer & Murphy
Suite 800, 900 Circle 75 Parkway
Atlanta, GA 30339

RE: MUR 2989
Frank Love, Jr.

Dear Mr. Love:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John D. Comer, Esq.
Sell & Melton
P.O. Box 229
Macon, GA 31297-2899

RE: MUR 2989
Albert L. Luce, Jr.

Dear Mr. Comer:

On July 20, 1990, Albert L. Luce, Jr. was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Albert L. Luce, Jr. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

DEC 10 1993

John E. Stumbo, Esq.
305 Knoxville Street
Fort Valley, Georgia 31030

RE: MUR 2989
George E. Luce

Dear Mr. Stumbo:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Todd McMahon
3501 207th Ave., SE
Issaquah, WA 98027

RE: MUR 2989
Todd McMahon

Dear Mr. McMahon:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

A. Minis, Jr.
Minis, Russell, Mayhew, Inc.,
P.O. Box 23559
Savannah, GA 31403

RE: MUR 2989
A. Minis, Jr.

Dear Mr. Minis:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

C. L. Patrick
P.O. Box 391
Columbus, GA 31906

RE: MUR 2989
C. L. Patrick

Dear Mr. Patrick:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354220 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Joe W. Rogers, Jr.
2133 Lavista Exec. Park
Tucker, GA 30084

RE: MUR 2989
Joe W. Rogers, Jr.

Dear Mr. Rogers:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Jarvin Levison, Esq.
Arnall Golden & Gregorn
55 Park Place
Atlanta, GA 30335

RE: MUR 2989
Gary W. Rollins

Dear Mr. Levison:

On July 20, 1990, Gary W. Rollins was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Gary W. Rollins. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354207

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

W. L. Shirley
121 Grogan St.
Lavonia, GA 30553

RE: MUR 2989
W. L. Shirley

Dear Mr. Shirley:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John S. Logan, Esq.
Dow, Lohnes & Albertson
1255 23rd Street
Washington, D.C. 20037

RE: MUR 2989
Rankin Smith

Dear Mr. Logan:

On July 20, 1990, Rankin Smith was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Rankin Smith. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Wilburn E. Stewart, Jr.
P.O. Box 929
Macon, Georgia 31202

RE: MUR 2989
Wilburn E. Stewart, Jr.

Dear Mr. Stewart:

On August 9, 1990, you were notified that the Federal Election Commission had found reason to believe you had violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354221O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John M. Stuckey, Jr., Esq.
Glass, McCullough, Sherrill & Harrold
1409 Peachtree, N.E.
Atlanta, GA 30309

RE: MUR 2989
John M. Stuckey, Jr.

Dear Mr. Stuckey:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354221

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Cynthia Thawley
7115 Raich Dr.
San Jose, CA 95120

RE: MUR 2989
Cynthia Thawley

Dear Ms. Thawley:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

William E. Timmons
4426 Garfield Street, N.W.
Washington, D.C. 20007

RE: MUR 2989
William E. Timmons

Dear Mr. Timmons:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

J. Lloyd Tomer
10801 Pear Tree Lane, Ste 100
St. Ann, MO 63074

RE: MUR 2989
J. Lloyd Tomer

Dear Mr. Tomer:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Matthew A. Towery, Esq.
Towery, Thompson, Gulliver & Bunch, P.C.
3715 Northside Parkway
Atlanta, GA 30327

RE: MUR 2989
Maurice J. Towery

Dear Mr. Towery:

On July 20, 1990, your client, Maurice J. Towery, was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Maurice J. Towery. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Steven M. Mister, Esq.
Wiley Rein & Fielding
1776 K St., N.W.
Washington, D.C. 20006

RE: MUR 2989
Robert L. Turley

Dear Mr. Mister:

On July 20, 1990, Robert L. Turley was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Robert L. Turley. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Michael R. Utz
P. O. Box 3405
Longwood, FL 32779

RE: MUR 2989
Michael R. Utz

Dear Mr. Utz:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Lafayette Walker
10012 Sorrel Ave.
Potomac, MD 20854

RE: MUR 2989
Lafayette Walker

Dear Mr. Walker:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Randall Walker
611 Salem Church Rd.
Carrolton, GA 30117

RE: MUR 2989
Randall Walker

Dear Mr. Walker:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Charles B. West
3340 Peachtree Road, N.W.
Atlanta, Georgia 30026

RE: MUR 2989
Charles B. West

Dear Mr. West:

On August 9, 1990, you were notified that the Federal Election Commission had found reason to believe you had violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Richard K. Whitehead, Jr.
1216 Zonolite Rd., N.E.
Atlanta, GA 30306

RE: MUR 2989
Richard K. Whitehead, Jr.

Dear Mr. Whitehead:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

S. Jarvin Levison, Esq.
Arnall Golden & Gregory
55 Park Place, Suite 400
Atlanta, GA 30335

RE: MUR 2989
Claude Williams, Jr.

Dear Mr. Levison:

On July 20, 1990, Claude Williams, Jr. was notified that the Federal Election Commission had found reason to believe he violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Claude Williams, Jr. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

9304354222222

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Emory Winship
P.O. Box 1566
Fernandina Beach, FL 32034

RE: MUR 2989
Emory Winship

Dear Mr. Winship:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

J. Barnett Woodruff
P.O. Box 750
Columbus, Georgia 31902-0750

RE: MUR 2989
Emily Woodruff

Dear Mr. Woodruff:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

J. Barnett Woodruff
P. O. Box 750
Columbus, GA 31902-0750

RE: MUR 2989
J. Barnett Woodruff

Dear Mr. Woodruff:

On July 20, 1990, you were notified that the Federal Election Commission had found reason to believe you violated 2 U.S.C. § 441a(a)(1)(A). A response was submitted to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against you. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

mary l Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Jon G. White, Senior V. P.
Citizens and Southern Trust Company
P.O. Box 4446
Atlanta, Georgia 30302

RE: MUR 2989
A. T. Kennedy

Dear Mr. White:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Jesse W. Walters, Esq.
Perry, Walters & Lippit
409 N. Jackson Street
P.O. Box 469
Albany, Georgia 31703-8401

RE: MUR 2989
Wright Farms

Dear Mr. Walters:

On August 3, 1990, Wright Farms was notified that the Federal Election Commission had found reason to believe Wright Farms had violated 2 U.S.C. § 441b(a). You submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Wright Farms. Accordingly, the Commission closed its file in this matter.

The Commission reminds you, however, that 2 U.S.C. § 441b(a) prohibits corporations from making contributions or expenditures in connection with any election to any political office. Therefore, your client should take steps to ensure future compliance with this statutory provision.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record

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before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Lynwood G. Willis, A.I.A.
Willis and Veenstra Investment Company
415 East Monroe
Jacksonville, Florida 32202

RE: MUR 2989
Willis and Veenstra Investment Co.

Dear Mr. Willis:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354229

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

General Roofing Co. d/b/a
White Roofing Company
P.O. Box 14423
Atlanta, Georgia 30324

RE: MUR 2989
General Roofing Co. d/b/a
White Roofing Company

Gentlemen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354223O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Mrs. Susan Weatherly
Mr. Sam Weatherly
Weatherly & Associates, Inc.
P.O. Box 503
Tybee Island, Georgia 31328

RE: MUR 2989
Weatherly & Associates, Inc.

Dear Mr. and Mrs. Weatherly:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354223 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Barry W. Banister, General Manager
Ed Voyles Chrysler-Plymouth
789 Cobb Parkway, S.E.
Marietta, Georgia 30062

RE: MUR 2989
Ed Voyles Chrysler-Plymouth

Dear Mr. Banister:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354222 32

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

A. Lee Vaughn, President
Vaughn Lumber Company
P.O. Box 31
Forsyth, Georgia 31029

RE: MUR 2989
Vaughn Lumber Company

Dear Mr. Vaughn:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354223 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John Stubbs, President
Stubbs Shipping Company
P.O. Drawer 1543
Fernandina Beach, Florida 32034

RE: MUR 2989
Stubbs Shipping Company

Dear Mr. Stubbs:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354223 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Stricklands Pharmacy
111 Bonard
Glennville, Georgia 30427

RE: MUR 2989
Stricklands Pharmacy

Gentlemen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354235

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Dan Szucs, President
Standard Southeast, Inc.
1555 Oakbrook Drive, Suite 100
Norcross, Georgia 30093

RE: MUR 2989
Standard Southeast, Inc.

Dear Mr. Szucs:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354223 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Southern Energy
P.O. Box 960
Brunswick, Georgia 31520

RE: MUR 2989
Southern Energy

Gentlemen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354237

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

William O. Inman, III, President
Robert J. Shircliff and Associates
2529 Gulf Life Tower
Jacksonville, Florida 32207

RE: MUR 2989
Robert J. Shircliff & Assoc.

Dear Mr. Inman:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354223 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Charles J. Jones, President
Riverside Development
3590 Riverside Drive
P.O. Box 7006
Macon, Georgia 31298

RE: MUR 2989
Riverside Development

Dear Mr. Jones:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354223 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Frances C. Long, MBA, CPA
13A S. Mulberry Street
P.O. Box 272
Statesboro, Georgia 30458

RE: MUR 2989
William L. Reno and Associates

Dear Mr. Long:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Robert F. Reeves, Partner
Reeves, Avary Associates
5063 Fox Forest Circle
Lilburn, Georgia 30247

RE: MUR 2989
Reeves, Avary Associates

Dear Mr. Reeves:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354224 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

J. P. Cranmer, Senior Vice President
The Pinkerton & Laws Co.
875 Douglas Road, N.E.
Atlanta, Georgia 30342

RE: MUR 2989
The Pinkerton & Laws Co.

Dear Mr. Cranmer:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354224242

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Don F. DeFoor, Esq.
2175-B County Line Road
Douglasville, Georgia 30135

RE: MUR 2989
Bill Pilgrim Enterprises, Inc.

Dear Mr. DeFoor:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354224 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Will Hays Pickett, Jr.
Pickett, Pickett & Pickett
225 N. Main Street
Jasper, Georgia 30143

RE: MUR 2989
Pickett, Pickett & Pickett

Dear Mr. Pickett:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354224 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Peoples' Transportation Services, Ltd.
P.O. Box 491261
Atlanta, Georgia 30349

RE: MUR 2989
Peoples' Transportation
Services, Ltd.

Gentlemen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354224 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Sylvia A. Meares, Office Manager
Pacelli High School
Trinity Drive
Columbus, Georgia 31907-3299

RE: MUR 2989
Pacelli High School

Dear Ms. Meares:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354224 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Patrician Properties
P.O. Box 8879
Savannah, Georgia 31412

RE: MUR 2989
Patrician Properties

Gentlemen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354224 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Beverly Allen, Business Manager
Oral and Maxillofacial Surgery Associates
5243 Snapfinger Woods Drive
Suite 106
Decatur, Georgia 30035

RE: MUR 2989
Oral and Maxillofacial Surgery Associates

Dear Ms. Allen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354224 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

OB-GYN Associates, P.A.
72 Plaza Way
Marietta, Georgia 30060

RE: MUR 2989
OB-GYN Associates, P.A.

Gentlemen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354224 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

William M. McIntosh, Esq.
Fallin & McIntosh
39 N. Main Street, P.O. Box 250
Moultrie, Georgia 31776

RE: MUR 2989
Moultrie Surgical Assoc., P.C.

Dear Mr. McIntosh:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354225O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Alfred Hammack
d/b/a Morrow Professional Building
221 Upper Riverdale Road, Apt. 5E
Jonesboro, Georgia 30236

RE: MUR 2989
Alfred Hammack d/b/a
Morrow Professional Building

Dear Mr. Hammack:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

mary L. Taksar

Mary L. Taksar
Attorney

9304354225 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Christopher H. Beecher
Morris Newspaper Corp.
P.O. Box 8167
Savannah, Georgia 31412

RE: MUR 2989
Morris Newspaper Corp.

Dear Mr. Beecher:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354225 2

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Charles W. Moore,
Vice President for Finance
Morris Brown College
643 Martin Luther King, Jr. Drive, N.W.
Atlanta, Georgia 30314

RE: MUR 2989
Morris Brown College

Dear Mr. Moore:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354225 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Bill Willingham, President
Maricom Electronics, Inc.
P.O. Box 14287
Savannah, Georgia 31416

RE: MUR 2989
Maricom Electronics, Inc.

Dear Mr. Willingham:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354225 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Frank L. Woodard
Lakeside Farm
Route 1, Box 223
Hayesville, North Carolina 28904

RE: MUR 2989
Lakeside Farm

Dear Mr. Woodard:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354225 5

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Wayne Durrence
J & W Farms
P.O. Box 354
Glenville, Georgia 30427

RE: MUR 2989
J & W Farms

Dear Mr. Durrence:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354225 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Ms. Malinda J. Mortin, Secretary
Lex Jolley & Company, Inc.
34 Peachtree St., N.W., Suite 2500
Atlanta, Georgia 30303-2316

RE: MUR 2989
Lex Jolley & Co., Inc.

Dear Ms. Mortin:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Gerald J. Bresnihan, Treasurer
Independent Freight Forwarders &
Customs Brokers Association of
Savannah, Inc.
P.O. Box 1465
Savannah, Georgia 31402

RE: MUR 2989
Independent Freight Forwarders &
Customs Brokers Association of
Savannah, Inc.

Dear Mr. Bresnihan:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354225 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

William L. Tribble, Esq.
P.O. Box 2095
Dublin, Georgia 31021

RE: MUR 2989
Homeway Rentals of Montgomery

Dear Mr. Tribble:

On August 3, 1990, Homeway Rentals of Montgomery was notified that the Federal Election Commission had found reason to believe Homeway Rentals of Montgomery had violated 2 U.S.C. § 441b(a). You submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Homeway Rentals of Montgomery. Accordingly, the Commission closed its file in this matter.

The Commission reminds you, however, that 2 U.S.C. § 441b(a) prohibits corporations from making contributions or expenditures in connection with any election to any political office. Therefore, your client should take steps to ensure future compliance with this statutory provision.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record

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before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 0 9 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Brenda Clements
Folsom Construction Company
2281 U.S. Highway 41 South
Cordele, Georgia 31015

RE: MUR 2989
Folsom Construction Company

Dear Ms. Clements:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354226 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Forrest W. Sweat, Jr., Esq.
Walker & Sweat
809 Elizabeth Street
P.O. Box 1100
Waycross, Georgia 31502

RE: MUR 2989
Fesperman Insurance Co.

Dear Mr. Sweat:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354222 62

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Farmers Tobacco Warehouse
P.O. Box 432
Vidalia, Georgia 30474

RE: MUR 2989
Farmers Tobacco Warehouse

Gentlemen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354222 63

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Kathleen Ford Bay, Esq.
Kays & Anson
2700 One American Center
600 Congress Ave.
Austin, Texas 78701

RE: MUR 2989
Family and Marriage Resources

Dear Ms. Bay:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354422264

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Ellis Building Systems
Route 1, Highway 100 South
Tallapoosa, Georgia 30176

RE: MUR 2989
Ellis Building Systems

Gentlemen:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Betsy McCamey
Dunwoody Office Supply, Inc.
5481 Chamblee-Dunwoody Rd.
Dunwoody, Georgia 30362

RE: MUR 2989
Dunwoody Office Supply

Dear Ms. McCamey:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354226 6

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

F. M. Fairman, President
Dixie Trucking Company
P.O. Box 960
Brunswick, Georgia 31521

RE: MUR 2989
Dixie Trucking Company

Dear Mr. Fairman:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354226 7

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

J. R. Curry, Jr.
Curry Farm Supply
P.O. Box 291
Shellman, Georgia 31786

RE: MUR 2989
Curry Farm Supply

Dear Mr. Curry:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Gary D. Cooper
Gary Cooper Construction
2507 W. Doublegate Drive
Albany, Georgia 31707

RE: MUR 2989
Gary Cooper Construction

Dear Mr. Cooper:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

W. B. Hendry, President
Consolidated Tape & Label Company
641 Smyrna Hill Drive
Smyrna, Georgia 30080-4005

RE: MUR 2989
Consolidated Tape

Dear Mr. Hendry:

On August 3, 1990, you were notified that the Federal Election Commission had found reason to believe Consolidated Tape & Label Company had violated 2 U.S.C. § 441b(a). You submitted a response to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Consolidated Tape & Label Company. Accordingly, the Commission closed its file in this matter.

The Commission reminds you, however, that 2 U.S.C. § 441b(a) prohibits corporations from making contributions or expenditures in connection with any election to any political office. Therefore, you should take steps to ensure future compliance with this statutory provision.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record

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before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 0 9 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Larry Collins, Partner
Collins Brothers Farm
Route 3, Box 88A
Vienna, Georgia 31092

RE: MUR 2989
Collins Brothers

Dear Mr. Collins:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354222 72

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

June E. Edmondson, Esq.
Williams & Jensen, P.C.
1101 Connecticut Ave., N.W.
Washington, D.C. 20036

RE: MUR 2989
Century 21 of the Southeast, Inc.

Dear Ms. Edmondson:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354227 3

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Yvonne Otts, Broker
Century 21 Cook Realty, Inc.
108 S. Thornton Ave.
Dalton, Georgia 30722-0926

RE: MUR 2989
Century 21 Cook Realty

Dear Ms. Otts:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354227 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Dr. Jonathan Greer, II, Pastor
Cathedral of Faith Church of God
In Christ
1137 Avon Avenue, S.W.
Atlanta, Georgia 30310

RE: MUR 2989
Cathedral of Faith

Dear Pastor Greer:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Edward Hoenig, Deputy Manager
Brown Brothers Harriman & Co.
59 Wall Street
New York, New York 10005

RE: MUR 2989
Brown Brothers Harriman & Co.

Dear Mr. Hoenig:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Herman Clark, Esq.
Clark & Justice
142 S. Park Square, Suite H
Marietta, Georgia 30060

RE: MUR 2989
Rose Briglevich, M.D.

Dear Mr. Clark:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354222777

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

William Q. Walker, Jr., President
Bill Walker and Associates
McKinnon Airport
St. Simons Island, Georgia 31522

RE: MUR 2989
Bill Walker and Associates

Dear Mr. Walker:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

mary L. Taksar

Mary L. Taksar
Attorney

9304354227 8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

William M. Taylor
Bill Taylor & Associates, Inc.
4161 Carmichael Ave., Suite 135
Jacksonville, Florida 32207

RE: MUR 2989
Bill Taylor & Associates

Dear Mr. Taylor:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Robert M. Nicholson, Comptroller
Bibb Distributing Co.
6401 Hawkinsville Road
Macon, Georgia 31202

RE: MUR 2989
Bibb Distributing Co.

Dear Mr. Nicholson:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354228O

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Freddi S. Hagin, President
Avail-Ability, Inc.
561 Thornton Road, Suite S
Lithia Springs, Georgia 30057

RE: MUR 2989
Avail-Ability, Inc.

Dear Ms. Hagin:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Ray Miller, President
Armada Vehicle Rental, Inc.
P.O. Box 48405
Doraville, Georgia 30362

RE: MUR 2989
Armada Vehicle Rental, Inc.

Dear Mr. Miller:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Natalia Orfanos, Public Relations
A.G. Spanos Development, Inc.
1341 W. Robinhood Drive
Stockton, California 95207

RE: MUR 2989
A.G. Spanos Development, Inc.

Dear Ms. Orfanos:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354228 83

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Edwin G. Hill, Esq.
Dabbs, Hickman, Hill & Cannon
319 S. Main St.
P.O. Box 727
Statesboro, Georgia 30458

RE: MUR 2989
Dr. John C. Adams, Jr. P.C.

Dear Mr. Hill:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354222884

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Ben Cotten, Esq.
Cotten, Day & Selfon
Twelfth Floor
1899 L Street, N.W.
Washington, D. C. 20036

RE: MUR 2989
Friends of Mattingly and
Donald P. Gammon, as treasurer

Dear Mr. Cotten:

On June 25, 1990, you were notified that the Federal Election Commission had found reason to believe your clients, Friends of Mattingly and Donald P. Gammon, as treasurer, violated 2 U.S.C. §§ 432, 434(b), 441a(f), 441b(a) and 11 C.F.R. § 110.6(c)(3). You submitted a response on behalf of your clients to the Commission's reason to believe finding.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no further action against Friends of Mattingly and Donald P. Gammon, as treasurer. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when they are received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Date the Commission voted to close the file: DEC 09 1993

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Myles V. Lynk, Esq.
Dewey, Ballantine, Bushby,
Palmer & Wood
1775 Pennsylvania Ave., N.W.
Washington, D.C. 20006

RE: MUR 2989
A. L. Williams & Associates
Political Action Committee and
Jack Smith, as Treasurer

Dear Mr. Lynk:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Robert E. McKew, Esq.
Assistant General Counsel
American Financial Services
Association PAC
1101 14th St., N.W.
Washington, D.C. 20005

RE: MUR 2989
American Financial Services
Association Political
Action Committee and
Thomas L. Thomas, as treasurer

Dear Mr. McKew:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

John R. Gentille, Treasurer
Associated General Contractors
Political Action Committee
1957 E St., N.W.
Washington, D. C. 20006

RE: MUR 2989
Associated General Contractors
Political Action Committee and
John R. Gentille, as treasurer

Dear Mr. Gentille:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Nancy C. O'Connor, Treasurer
Bankers Trust New York Corporation
Political Action Committee
P.O. Box 318, Church Street Station
New York, New York 10008

RE: MUR 2989
Bankers Trust New York Corporation
Political Action Committee and
Nancy C. O'Connor, as treasurer

Dear Ms. O'Connor:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

9304354289

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Timothy S. Perry, Esq.
Alston & Bird
One Atlantic Center
1201 W. Peachtree Street
Atlanta, Georgia 30309-3424

RE: MUR 2989
Citizens and Southern Georgia
Corporation Better Government
Committee and
James D. Dixon, as treasurer

Dear Mr. Perry:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Genean McKinnon, Treasurer
Committee to Re-Elect Senator
Paula Hawkins
701 Via Bella
P.O. Box 193
Winter Park, Florida 32789

RE: MUR 2989
Committee to Re-Elect Senator
Paula Hawkins and
Genean McKinnon, as treasurer

Dear Ms. McKinnon:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

James F. Schoener, Esq.
1712 Glenhouse Drive., #315
Sarasota, Florida 34231

RE: MUR 2989
Flowers Industries Inc. Political
Action Committee and
Earl Quigg, as treasurer

Dear Mr. Schoener:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

J. David Dyson, Esq.
Gold Kist Political Action
for Farmers, Inc.
P.O. Box 2210
Atlanta, Georgia 30301

RE: MUR 2989
Gold Kist Political Action for
Farmers, Inc., and
Paul G. Brower, as treasurer

Dear Mr. Dyson:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Stephen E. Chaudet, Treasurer
Lockheed Employees' Political
Action Committee
4500 Park Granada Boulevard
Calabasas, California 91399-0610

RE: MUR 2989
Lockheed Employees' Political
Action Committee and
Stephen E. Chaudet, as treasurer

Dear Mr. Chaudet:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Richard Moe, Esq.
Paul B. Nolan, Esq.
Davis Polk & Wardwell
1300 I Street, N.W.
Washington, D.C. 20005

RE: MUR 2989
Morgan Companies Political
Action Committee and
Cory N. Strupp, as treasurer

Dear Messrs. Moe and Nolan:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Michael L. Kerley, V.P.
National Association of
Life Underwriters PAC
1922 F Street, N.W.
Washington, D. C. 20006-4387

RE: MUR 2989
National Association of Life
Underwriters Political
Action Committee and
Bruce C. Hendrickson, as treasurer

Dear Mr. Kerley:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Jerry Margaret Simmons, Esq.
Simmons & McAndrews
1441 Fourth Street
Santa Monica, California 90401

RE: MUR 2989
Northrop Employees Political
Action Committee and
Sherry C. Levit, as treasurer

Dear Ms. Simmons:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Ellenore O'Hanrahan, Esq.
The Dun & Bradstreet Corporation
299 Park Ave., 23rd Floor
New York, New York 10171

RE: MUR 2989
Political Action Committee of
Dun & Bradstreet Corporation
and Philip C. Danford, as treasurer

Dear Ms. O'Hanrahan:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

Although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record before receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

James D. Gallagher,
Assistant General Counsel,
Law Department
Prudential Insurance Company of America
751 Broad Street
Newark, New Jersey 07102-3777

RE: MUR 2989
Prudential Insurance Company of America Federal Political Action Committee and
Samuel T. Piscitelli, as treasurer

Dear Mr. Gallagher:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Roman Rice, Treasurer
Public Service Political Action Committee
1761 Business Center Drive, Suite 230
Reston, Virginia 22090

RE: MUR 2989
Public Service Political
Action Committee and
Roman Rice, as treasurer

Dear Mr. Rice:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Kenneth A. Gross, Esq.
Skadden, Arps, Slate, Meagher & Flom
1440 New York Ave., N.W.
Washington, D. C. 20005-2107

RE: MUR 2989
Textron Incorporated Political Action Committee and
Gary E. Atwell, as treasurer

Dear Mr. Gross:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Helen M. Houley, Esq.
United Technologies Corp.
1825 Eye Street, N.W., Suite 700
Washington, D. C. 20006

RE: MUR 2989
United Technologies Corporation
Political Action Committee and
Donald E. Groce, as treasurer

Dear Ms. Houley:

This is to advise you that this matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public.

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If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

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