



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3014

DATE FILMED 10/12/90 CAMERA NO. 2

CAMERAMAN AS

104000003

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 28 April 1989

ANALYST: Edward D. Ryan

I. COMMITTEES:

- A. Second District Republican Committee
(C00213967)
Anita Heiman, Treasurer
(March 30, 1988 to Present)
Clyde D. Graeber, Treasurer
(December 1986 to March 30, 1988)
Rt. 3 Box 147
Seneca, KS 66538
- B. Douglas County Republican Central
Committee (unregistered committee)
Chris Miller, Treasurer
1505 Kasold
Lawrence, KS 66046

II. RELEVANT STATUTE:

- A. 11 CFR 102.5(a)(1)(i)
- B. 2 U.S.C. §433(a)
2 U.S.C. §434(a)(1)
11 CFR 104.1(d)
11 CFR 104.5(c)

III. BACKGROUND:

- A. Receipt of Apparent Impermissible Funds
- B. Failure to Register and Report once \$5,000 or more in Contributions/Transfers have been made to a Committee in a Calendar Year

The Second District Republican Committee (a registered party committee, "Second District") received an apparent impermissible contribution/transfer from Douglas County Republican Central Committee (an unregistered organization, "Douglas County") on July 5, 1988 totalling \$6,223.12 (Attachment 2).

On November 16, 1988, a Request for Additional Information ("RFAI") was sent to Second District, informing them the contribution/transfer may be in violation of the limitations and prohibitions of the Act. The RFAI informed

90040502239

SECOND DISTRICT REPUBLICAN COMMITTEE
DOUGLAS COUNTY REPUBLICAN CENTRAL COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Second District that an unregistered organization could only make contributions if a separate account was established containing funds permitted under the Act, or if the organization could demonstrate through a reasonable accounting method that the sources of funds contributed were permissible under the Act. The RFAI also noted that in order to be in compliance with the Act, Second District should refund the money to the donor, or transfer-out to a non-federal account, the amount in excess of \$5,000 and refund or transfer-out any or all prohibited funds (Attachment 3).

On November 17, 1988, the Reports Analysis Division ("RAD") analyst sent Douglas County a Registration Notice. The Notice informed Douglas County that a contribution of this nature qualified it as a "political committee" subject to the registration, reporting, and other requirements of the Act. In addition, Douglas County was given the options of submitting a Statement of Organization and filing disclosure reports on FEC FORM 3X, receiving a full contribution refund, or directing the recipient committee to transfer the funds to a non-federal account (Attachment 4).

On December 2, 1988 (Certified Mailing Date), Mr. Chris Miller, Treasurer of Douglas County, responded to RAD's Notice by providing a copy of a letter to Mr. James Cates, then Chairman of Second District. The letter outlined Douglas County's intent and understanding that the transfer of funds were to be used for local elections only and not used to influence federal elections (Attachment 5).

On December 8, 1988, a Second Notice was sent to both Second District and Douglas County for failure to respond to RAD's RFAI and the Registration Notice. The Notices cited the letters from Mr. Miller and Mr. Cates and quoted the sentence stating the intention of the transfer was to be used for local elections and not for federal elections (Attachments 6 and 7).

On December 9, 1988 (Certified Mailing Date), Ms. Anita Heiman responded to RAD's RFAI by submitting a letter explaining the receipt from Douglas County was Second District's portion of money raised on Second District's behalf. The funds consisted of "small donations" or proceeds of tickets sold at fundraising events (Attachment 8).

RAD's analyst called Ms. Heiman on January 12, 1989, to see if she was going to take any further action on the

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SECOND DISTRICT REPUBLICAN COMMITTEE
DOUGLAS COUNTY REPUBLICAN CENTRAL COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 3

Douglas County transfer. She said she would discuss the matter with the Chairman of Second District, but that refunding the money was impossible because there were insufficient funds to do so (Attachment 9).

That same day, January 12, 1989, the RAD analyst called Mr. Chris Miller. Mr. Miller was very open about discussing the activities, support and general background of Douglas County. He was asked to put this in writing to further respond to RAD's Notices. He said he would be glad to do so and submit this in several days (Attachment 10).

Mr. Miller's letter arrived on January 23, 1989 providing detailed and specific information regarding the financial composition and activities of Douglas County. Mr. Miller stated again that funds transferred to the Second District by Douglas County were utilized to assist local candidates and not for federal election purposes. He went on to say that Douglas County exists mainly from fundraisers (such as the annual Fletcher Bell Golf Tournament) and personal donations. He stated that he realized the funds transferred should have been deposited in a separate account and then transferred independently to Second District. He explained that in the past it was "sufficient to simply deposit the funds, and disburse them" to Second District. He concluded by saying, that it was their intention to change this policy to avoid this type of situation in the future (Attachment 11).

As of this date, Second District has not refunded or transferred the impermissible funds out to a non-federal account or listed this as a debt owed to Douglas County. Also, Douglas County has not registered and filed reports with the Commission.

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

FEDERAL ELECTION COMMISSION
1987-1988
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

DATE 20APR89

PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
					TYPE OF FILER	
SECOND DISTRICT REPUBLICAN COMMITTEE				ID #C00213967	PARTY QUALIFIED	
CONNECTED ORGANIZATION: BLANK						
	REQUEST FOR ADDITIONAL INFORMATION 2ND			0 00	2	88FEC/572/5169
1987	STATEMENT OF ORGANIZATION			12MAR87	3	87FEC/463/0112
	STATEMENT OF ORGANIZATION - AMENDMENT			17JUN87	4	87FEC/471/1636
	MID-YEAR REPORT	7,075	-	1JAN87 -30JUN87	7	87FEC/481/0994
	MID-YEAR REPORT - AMENDMENT	-	-	1JAN87 -30JUN87	1	89FEC/584/2776
	REQUEST FOR ADDITIONAL INFORMATION			1JAN87 -30JUN87	3	88FEC/565/2175
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN87 -30JUN87	9	88FEC/569/4517
	YEAR-END	13,452	1,605	30JUN87 -31DEC87	7	88FEC/504/4319
	YEAR-END - AMENDMENT	-	-	30JUN87 -31DEC87	1	89FEC/584/1260
	REQUEST FOR ADDITIONAL INFORMATION			30JUN87 -31DEC87	2	88FEC/565/2179
	REQUEST FOR ADDITIONAL INFORMATION 2ND			30JUN87 -31DEC87	9	88FEC/569/4508
1988	STATEMENT OF ORGANIZATION - AMENDMENT			4APR88	2	88FEC/515/4460
	STATEMENT OF ORGANIZATION - AMENDMENT			4NOV88	4	88FEC/564/3474
	REQUEST FOR ADDITIONAL INFORMATION			16NOV88	1	88FEC/565/2167
	STATEMENT OF ORGANIZATION - AMENDMENT			9DEC88	1	89FEC/584/1261
	APRIL QUARTERLY	140	137	1JAN88 -31MAR88	5	88FEC/523/5493
	JULY QUARTERLY	691	5,158	31MAR88 -30JUN88	6	88FEC/537/3435
	JULY QUARTERLY - AMENDMENT	-	-	31MAR88 -30JUN88	1	89FEC/584/1259
	REQUEST FOR ADDITIONAL INFORMATION			31MAR88 -30JUN88	2	88FEC/565/2182
	REQUEST FOR ADDITIONAL INFORMATION 2ND			31MAR88 -30JUN88	9	88FEC/569/4499
	OCTOBER QUARTERLY	6,297	15,953	30JUN88 -30SEP88	9	88FEC/556/1306
	OCTOBER QUARTERLY - AMENDMENT	-	-	30JUN88 -30SEP88	3	88FEC/567/2584
	OCTOBER QUARTERLY - AMENDMENT	-	-	30JUN88 -30SEP88	1	88FEC/572/5109
	OCTOBER QUARTERLY - AMENDMENT	-	-	30JUN88 -30SEP88	3	89FEC/578/5327
	REQUEST FOR ADDITIONAL INFORMATION			30JUN88 -30SEP88	5	88FEC/565/2169
	REQUEST FOR ADDITIONAL INFORMATION 2ND			30JUN88 -30SEP88	6	88FEC/569/4619
	REQUEST FOR ADDITIONAL INFORMATION			30JUN88 -30SEP88	4	89FEC/585/0994
	REQUEST FOR ADDITIONAL INFORMATION 2ND			30JUN88 -30SEP88	5	89FEC/588/0558
	PRE-GENERAL	0	1,500	30SEP88 -19OCT88	5	88FEC/561/4276
	POST-GENERAL	0	1,350	6DEC88	4	88FEC/572/5110
	YEAR-END	378	527	29NOV88 -31DEC88	6	89FEC/580/4960
	TOTAL	28,033	0 26,230	0	130	TOTAL PAGES

ALL REPORTS HAVE BEEN REVIEWED.

ENDING CASH ON HAND AS OF 12/31/88: \$6,120.73

Debts owed to the committee: \$1 750.00

Debts owed to the committee: 0.00

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER

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)

2ND DISTRICT REPUBLICAN COMMITTEE

A. Full Name, Mailing Address and ZIP Code

DOUGLAS CO. REP. CENTRAL
COMMITTEE
1505 NASOLD
LAWRENCE, KS 66046Receipt For: ☐ Primary ☐ General☒ Other (specify):

Name of Employer

FLETCHER BELL
FUND RAISER
(CHECK NO. 306)

Occupation

Date (month,
day, year)DEPOSIT
7-5-88Amount of Each
Receipt this Period

6223.12

Aggregate Year-to-Date > \$

B. Full Name, Mailing Address and ZIP Code

BAILEYVILLE STATE BANK
P.O. BOX 280
SENECA, KS 66580Receipt For: ☐ Primary ☐ General☒ Other (specify):

Name of Employer

INTEREST (2624)

Occupation

Date (month,
day, year)

8-20-88

Amount of Each
Receipt this Period

73.97

Aggregate Year-to-Date > \$

C. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General☐ Other (specify):

Name of Employer

Occupation

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

D. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General☐ Other (specify):

Name of Employer

Occupation

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

E. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General☐ Other (specify):

Name of Employer

Occupation

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

F. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General☐ Other (specify):

Name of Employer

Occupation

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

G. Full Name, Mailing Address and ZIP Code

Receipt For: ☐ Primary ☐ General☐ Other (specify):

Name of Employer

Occupation

Date (month,
day, year)Amount of Each
Receipt this Period

Occupation

Aggregate Year-to-Date > \$

SUM TOTAL OF RECEIPTS THIS PERIOD

TOTAL THIS PERIOD LAST (MONTHS)

6,297.09



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

NOV 16 1988

Anita Heiman, Treasurer
Second District Republican
Committee
Route 3, Box 147
Seneca, KS 66538

Identification Number: C00213967

Reference: October Quarterly Report (6/30/88-9/30/88)

Dear Ms. Heiman:

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

-Schedule A of your report discloses a contribution(s) from an organization which is not a political committee registered with the Commission (pertinent portion(s) attached). In addition, the contribution appears to exceed the limits set forth in the Act. The Act precludes a political committee from receiving contributions from a person or another committee in excess of \$5,000 in a calendar year. (2 U.S.C. §441a(f)) Also, in order to make contributions to your committee, organizations which are not political committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution. (11 CFR 102.5(b))

If your committee does not finance non-federal activity, the receipt of the referenced contribution(s) may violate the limitations and prohibitions of the Act. (2 U.S.C. §§441a(f) and 441b) If your committee engages in both federal and non-federal activity, either through a separate non-federal account, or one account that finances activity in connection with both federal and non-federal elections, your committee may be in violation of 11 CFR 102.5(a).

In order to be in compliance with the Act, your committee must:

STR

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- 1) refund to the donor, or transfer-out to a non-federal account, the amount in excess of \$5,000; and
- 2) determine the extent to which your committee received funds that are not permissible, and refund or transfer-out the prohibited funds.

If you choose to transfer the funds to an account not used to influence federal elections, the Commission advises that you inform the contributor in writing and provide the contributor with the option of receiving a refund. You may wish to seek a written authorization (either before or after the transfer-out) from the donor for any transfer-out to protect the donor's interests.

Please inform the Commission immediately in writing and provide a photocopy of your check for the refund or transfer-out. Refunds and transfers-out should be disclosed on a supporting Schedule B for Line 26 or 20 of the report covering the period during which they are made.

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

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. (2 U.S.C. §441a(a))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If you have made an excessive contribution, you should either notify the recipient and request a refund of the amount in excess of \$1,000 and/or notify the recipient, in writing, of your redesignation of the contribution. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. (11 CFR 110.1(b))

SDR

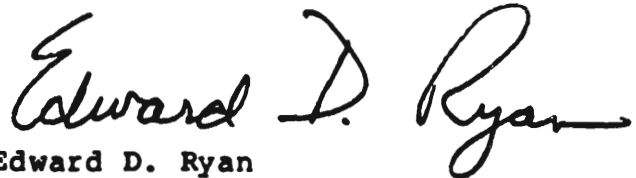
Although the Commission may take further legal steps concerning the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-Contribution checks written by your committee and subsequently voided or returned uncashed should be itemized on Schedule B for Line 21 as a negative entry. Please amend your report to include this adjustment.

-Your report disclosed certain line number totals that have been reflected on the wrong lines of the Detailed Summary Page. Contributions to non-federal candidates and committees should be properly disclosed on Schedule B, supporting Line 27 of the Detailed Summary Page. Please refer to the instructions contained on the forms to determine the proper categorization when preparing your next filing.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Edward D. Ryan
Reports Analyst
Reports Analysis Division

90040802296



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 17, 1988

Treasurer
Douglas County Republican Central
Committee
1505 Kasold
Lawrence, KS 66046

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act (the Act) but are not registered with the Commission.

The Act defines a "political committee" to include any local committee of a political party which receives contributions aggregating in excess of \$5,000 during a calendar year, or makes payments exempted from the definition of contribution or expenditure as defined in paragraphs (8) and (9) of 2 U.S.C. §431 aggregating in excess of \$5,000 during a calendar year, or makes contributions aggregating in excess of \$1,000 during a calendar year or makes expenditures aggregating in excess of \$1,000 during a calendar year. 2 U.S.C. §431(4).

A review of the receipts reported by the Second District Republican Committee indicates that your organization may have made expenditures in excess of \$1,000 during the calendar year 1988 to influence federal elections. The term "expenditures" includes contributions to federal candidates and committees supporting federal candidates. See 2 U.S.C. §431(9). This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization and file disclosure reports on FEC FORM 3X (relevant informational materials and forms enclosed); or
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence federal elections.

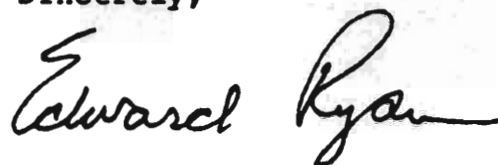
The second alternative noted above should be followed if your organization does not wish to register and file disclosure

reports, or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

If you believe that your organization is not a political committee, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date on this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Edward Ryan
Reports Analyst
Reports Analysis Division

Enclosures

90040802298

The Law Offices of
Chris Miller

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

00 DEC -5 AM 2:46

(913) 841-6245
(913) 841-6184
Topeka (Toll Free) 1-833-1116

600 Lawrence Ave., Suite 1E
P.O. Box 1265
Lawrence, KS 66044

Chris Miller
Gerard (Gerry) Little

December 1, 1988

CERTIFIED LETTER

Mr. Edward Ryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

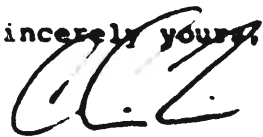
Re: Federal Election Campaign Act, Reporting Requirements

Dear Mr. Ryan:

I have recently received your letter of November 17, 1988, in my capacity as Treasurer of the Douglas County Republican Central Committee. In response to your letter, I have contacted Mr. James Cates, the Chairman of the Second District Republican Central Committee, here in Kansas, advising him of our understanding regarding the transfer of funds to which you refer in your letter of November 17, 1988, and requesting that he confirm that understanding.

I have enclosed a copy of my letter to Mr. Cates. Please advise whether you need any additional substantiation to clear up any apparent confusion regarding this transfer. Please feel free to contact me at your convenience. Thank you for your cooperation and assistance.

Sincerely yours,



Chris Miller
For the Firm

CM at
Enclosure

cc: Mr. James Cates
Mr. Ken Martinez

**The Law Offices Of
Chris Miller**

(913) 841-6245
(913) 841-6184
Topeka (Toll Free) 1-833-1116

800 Lawrence Ave., Suite 1E
P.O. Box 1265
Lawrence, KS 66044

Chris Miller
Gerard (Jerry) Little

December 1, 1988

Mr. James Cates
Chairman, Second District
Republican Central Committee
5500 SW 31st Street Terrace
Topeka, Kansas

Re: Proceeds from Annual Fletcher Bell Golf Tournament

Dear Jim:

As you may be aware, I have recently been elected as Treasurer of the Douglas County Republican Central Committee. In reviewing our records, I note that several thousand dollars was transferred from our account to your organization's account, as proceeds from the Fletcher Bell Golf Tournament, which is held annually.

In reviewing the records, it would appear, and it is my understanding, that the intent of this transfer was to provide funds to your organization for use in local elections only, and that the funds transferred were not intended for use in influencing any federal elections.

I would appreciate receiving a brief response from you, verifying that those funds were indeed transferred for use in local elections, and that none of the funds were used for influencing federal elections. Should you have any questions, please do not hesitate to contact me. I certainly appreciate your cooperation and assistance with regard to this matter.

Sincerely yours,

Chris Miller

CM/af
cc: Mr. Ken Martinez
Mr. Edward Ryan

9 0 0 4 0 8 0 2 3 0 1

The Law Offices of
Chris Miller

600 Lawrence Ave., Suite 48
P.O. Box 1285
Lawrence, KS 66044

8 8 0 3 9 6 7 2 5

fold at line (over top of envelope to the right
of the return address)

CERTIFIED

P 835 206 105

MAIL

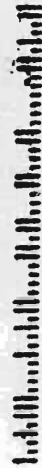


RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

00 DEC -5 AM 2 16

Mr. Edward Ryan
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

**RETURN RECEIPT
REQUESTED**





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-3

December 8, 1988

Anita Heiman, Treasurer
Second District Republican
Committee
Route 3, Box 147
Seneca, KS 66538

Identification Number: C00213967

Reference: October Quarterly Report (6/30/88-9/30/88)

Dear Ms. Heiman:

This letter is to inform you that as of December 7, 1988, the Commission has not received your response to our request for additional information, dated November 16, 1988. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

Please note that the Commission has received a letter dated December 1, 1988 from Chris Miller, Treasurer of the Douglas County Republican Central Committee. Enclosed in Mr. Miller's letter to the Commission was a letter to Mr. James Cates dated December 1, 1988. This letter stated that "the intent of this transfer was to provide funds to your organization for use in local elections only, and that the funds transferred were not intended for use in influencing any federal elections."

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Edward Ryan on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script that reads "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 8, 1988

Treasurer
Douglas County Republican Central
Committee
1505 Kasold
Lawrence, KS 66046

Dear Treasurer:

On November 17, 1988 you were notified that a review of the above-referenced report(s) raised questions as to specific contributions and/or expenditures, and the reporting of certain information required by the Federal Election Campaign Act.

The Commission notes your reponse dated December 1, 1988 in which you enclose a letter written to Mr. James Cates, Chairman of the Second District Republican Central Committee. In that letter you state that "the intent of this transfer was to provide funds to your organization for use in local elections only, and that the funds transferred were not intended for use in influencing any federal elections." Please inform the Commission in writing if a refund is received or if notification that a transfer-out occurs.

If this information is not received by the Commission within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Robert DiNardo on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".

John D. Gibson
Assistant Staff Director
Reports Analysis Division

08 DEC 12 PM 12:26

December 6, 1988

Edward D. Ryan
Reports Analyst Division
Federal Election Commission
Washington D.C. 20463

Dear Sir;

In reference to your preliminary review I would like to clarify the items mentioned as follows;

On Schedule A - The contribution or receipt from Douglas Co. Central Committee for 6,223.12 is our portion of the money raised in our behalf. It is many small donations or tickets sold as a fund raiser for 2nd Dist. of which Douglas Co. is a member. EDR

On Schedule B - We are affiliated or are classified as a subordinate of the Kansas Republican Party. (copy of the organization is enclosed.)

In your second letter you questioned the contributions of Riley County, Leavenworth County and Jackson County. They are the second district. They, like Douglas County, have fund raisers and instead of mailing contributions, deposit the many small donations and contribute one check.

The next two items of correspondence questioned administrative costs. The only cost incurred have been my mailings to your commission and the State Commission. I plan to turn in a bill for those small items but had planned to finalize all reports and submit one small statement. If you have any questions, please call 913-336-2784/2170.

Sincerely,

Anita Heiman

Anita Heiman
Second District Committee
Route 3 Box 147
Seneca, KS 66538

33725109

20040802305

CERTIFIED

P 120 457 126

MAIL

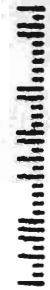
ANITA HEIMAN
Nebraska County Clerk
P.O. Box 186
NECA, KANSAS 66538

9 8 0 3 5 7 2 5 1



RECEIVED
FEDERAL ELECTION COMMISSION
88 DEC 12 PM 12:26

Edward D. Ryan
Reports Analyst Division
Federal Election Commission
Washington, D.C. 20463



TELECON

Attachment 9

ANALYST: Ed Ryan

CONVERSATION WITH: Anita Heiman, Treasurer

COMMITTEE: SECOND DISTRICT REPUBLICAN COMMITTEE(C00213967)

DATE: 1/12/89

SUBJECT(S): Transfer in from Douglas County Republican Central Committee, an unregistered committee.

I placed a phone call to Anita Heiman, treasurer of the Second District Republican Committee("Second District") to see what she was going to do about the money received from Douglas County Republican Central Committee("Douglas County"). She said she would discuss this with the Chairman, who tells her what to do, and call me back. I told her that money received from an unregistered committee under these circumstances should be refunded. She said they could not due that because they did not have enough money. I advised her that she could list this as a debt owed on schedule D on their next report. She said she would consider that when she talks to the Chairman.

93040802306

ANALYST: Ed Ryan

CONVERSATION WITH: Chris Miller, Treasurer

COMMITTEE: Douglas County Republican Central Committee

DATE: 1/12/89

SUBJECT(S): Transfer in to the Second District Republican Committee("Second District")

I placed a phone call to Mr. Chris Miller, Treasurer of the Douglas County Republican Central Committee("Douglas County") to discuss the transfer between his committee and Second District.

Mr. Miller was very open in discussing the activities, source of financial support, and what they should have done concerning the transfer to Second District. I asked him if he could provide this in writing and he said he would be glad to. He said he would send this in within the next several days.

90040802307

800 LAMARCA Ave., Suite 1E
P.O. Box 7265
Tomball, TX 77480

January 10, 1989

**Re: Douglas County Republican Central Committee
Second District Republican Central Committee
Campaign Reporting Requirements**

As you are aware, I am the current Treasurer of the Douglas County Republican Central Committee, and we have been corresponding for some time regarding an apparent discrepancy in the record-keeping activities of both the Second District Republican Central Committee and the Douglas County Republican Central Committee.

Specifically, there has been some concern over a transfer of funds from a local fund-raiser, for which funds were received, deposited into the Douglas County Central Committee general account, and then disbursed to the Second District Central Committee, for use in promoting Second District campaign efforts. As you are already aware, all of the funds which were transferred to the Second District by the Douglas County Republican Central Committee were utilized by the Second District Committee to assist local candidates, and were not used for federal election purposes.

By way of explanation, the Douglas County Republican Central Committee is a local County Republican political organization which exists mainly from fund-raisers, such as the one in question here, and donations by individuals. In fact, the main portion of the Douglas County Republican Central Committee's funding for any given year is provided by the annual Fletcher Bell Golf Tournament, part of the funds from which have caused the confusion which we have been trying to resolve. I would estimate that as much as sixty to seventy per cent (60%-70%) of the County funds result from that particular fund-raiser. As I have indicated previously, the remainder of our funding is from small personal donations, and other fund-raisers of a smaller magnitude.

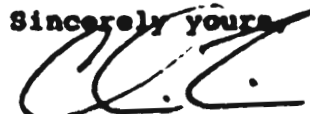
Mr. Edward Ryan
January 18, 1989
Page Two

As we now realize, the funds in question should probably have been deposited in a separate account, and then disbursed independently to the Second District Republican Central Committee and the Douglas County Republican Central Committee. However, in the past, it has been sufficient to simply deposit the funds, and disburse them as was done in 1988.

Nevertheless, it is our intention in the future to change this policy, and avoid the type of situation which we have here.

Should you have any questions about our operation, or if I can provide additional documentation which will resolve this matter, please feel free to let me know. Thank you for your cooperation and assistance.

Sincerely yours,



Chris Miller

CM/af

cc: Mr. Ken Martinez
Mr. Douglas Martin

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SENSITIVE

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

FIRST GENERAL COUNSEL'S REPORT

RAD Referral # 89L-12
STAFF MEMBER: Frances B. Hagan

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

RESPONDENTS: Second District Republican Committee
Anita Heiman, as treasurer
Douglas County Republican Central
committee (unregistered)
Chris Miller, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 441b(a)
2 U.S.C. §§ 433 and 434
11 C.F.R. § 102.6(a)

INTERNAL REPORTS CHECKED: Referral Materials

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was referred to the Office of the General Counsel by the Reports Analysis Division ("RAD") based on the 1987-1988 RAD Review and Referral Procedures for Unauthorized Committees.

II. FACTUAL AND LEGAL ANALYSIS

11 C.F.R. § 102.6(a)(ii) states that transfers of funds may be made without limit on amount between or among a national party committee, a State party committee and/or any subordinate party committee whether or not they are political committees and whether or not such committees are affiliated. Section 102.6(a)(iv) states that these transfers shall be made only from funds which are permissible under the Act. Such transfers are applicable to the threshold for registration and reporting as a

political committee under 2 U.S.C. §§ 433 and 434.

2 U.S.C. § 441b(a) prohibits the making or knowing receipt of corporate or labor organization funds in connection with a federal election.

2 U.S.C. §§ 433 and 434 require that political committees register and file reports of receipts and disbursements with the Commission. 2 U.S.C. § 431(4) defines a political committee as a committee which receives contributions or makes expenditures in excess of \$1,000 within a calendar year. See 2 U.S.C. §§ 431(8)(A) and (9)(A).

According to its 1988 October Quarterly Report, the Second District Republican Committee, a registered party committee in Seneca, Kansas ("Second District Committee"), on July 5, 1988, deposited a transfer of \$6,223.12 from the unregistered Douglas County [Kansas] Republican Central committee ("Douglas County committee").

RAD's RFAIs directed the Second District Committee to refund to the donor or transfer to a non-federal account the amount in excess of \$5,000 (2 U.S.C. §§ 441a(a)(1)(C) and 441a(f)), and to determine the amount of prohibited funds transferred in and then refund or transfer out the prohibited funds (2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)). When informed that insufficient funds remained in the account to make the transfer-out, RAD suggested that the Second District Committee could show the amount as a debt owed to the Douglas County committee.

Second District responded to RAD's RFAIs by stating that the "contribution or receipt from [the Douglas County committee] for

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[\$]6,223.12 is our portion of the money raised in our behalf. It is many small donations or tickets sold as a fund raiser for 2nd Dist. of which Douglas Co. in [sic] a member." Second District Committee responded to questions regarding three other counties, stating that "they are the second district." Further, [t]hey, like Douglas County, have fund raisers and instead of mailing contributions, deposit the many small donations and contribute one check." According to the RAD analyst, similar fundraising occurred in counties other than Douglas County, but transfers to the Second District Committee from these unregistered committees totaled less than \$1,000 each.

RAD instructed the Douglas County committee to register and report as a political committee (2 U.S.C. §§ 433, 434 and 431(4)(C)), and to obtain a full refund or direct the recipient committee to transfer the funds to a non-federal account.

The Douglas County committee responded to RAD's inquiries by providing a copy of a letter from the Douglas County committee to the Second District Committee, stating that the transfer represented "proceeds from the Fletcher Bell Golf Tournament, which is held annually." The letter to the Second District Committee further requested "a brief response from you, verifying that those funds were indeed transferred for use in local elections, and that none of the funds were used for influencing federal elections."

In subsequent correspondence with RAD, the Douglas County committee treasurer explained that his organization is mainly funded through fundraisers and individual donations. He estimated

that 60%-70% of funding is derived from the annual Fletcher Bell Golf Tournament. According to the Douglas County treasurer, proceeds from the golf tournament were "received, deposited into the Douglas County Central Committee general account, and then disbursed to the Second District Central Committee, for use in promoting Second District campaign efforts." He reiterated that the funds were "not used for federal election purposes." The Douglas County treasurer stated further:

As we now realize, the funds in question should probably have been deposited in a separate account, and then disbursed independently to the Second District Republican Central Committee and the Douglas County Republican Central Committee. However, in the past, it has been sufficient to simply deposit the funds, and disburse them as was done in 1988.

The treasurer stated the Douglas County committee's intention to change the policy to avoid future similar problems.

The information in the RAD referral materials is insufficient to characterize the nature of the fundraising event that apparently elicited most of the contributions in the transfer from the unregistered party committee to its registered party affiliate. As a result, this Office has prepared questions for the respondents to determine the nature of their fundraising methods in this matter (particularly, whether the fundraiser(s) may fall under the joint fundraiser regulations at 11 C.F.R. § 102.17).

As an unregistered party committee, the Douglas County committee may make unlimited transfers of funds to the Second District Committee, provided such transfers are made with funds permissible under the Act. 11 C.F.R. § 102.6(a)(ii). Therefore,

in this case, the amount of the transfer itself would not be violative of the Act's limitations at 2 U.S.C. § 441a(a)(1)(C). However, because Kansas law allows the use of corporate and labor union monies in connection with state elections, impermissible funds may have been in the Douglas County committee's bank account at the time of the transfer. Therefore, it appears that prohibited contributions resulted from the transfer of funds to the Second District Committee. Accordingly, this Office is recommending a finding of reason to believe that the Douglas County committee violated 2 U.S.C. § 441b(a) in this matter.

In addition, the Douglas County committee attained political committee status through its transfer in excess of \$1,000 to the registered Second District Committee. See 2 U.S.C. § 431(4)(A); 11 C.F.R. § 102.6(a)(2). Therefore, this Office is recommending findings of reason to believe that the Douglas County committee violated 2 U.S.C. §§ 433 and 434 for failing to register and report as a political committee.

Although the Douglas County treasurer asserted that the funds were "not used for federal election purposes," this assertion is belied by the fact that the Second District Committee deposited these funds into its federal account and reported the receipt of \$6,223.12 on its 1988 October Quarterly Report. Therefore, it appears that the Second District Committee violated 2 U.S.C. § 441b(a) by receiving prohibited funds in a transfer from the unregistered Douglas County committee.

III. RECOMMENDATIONS

1. Open a MUR.

2. Find reason to believe that the Second District Republican Committee and Anita Heiman, as treasurer, violated 2 U.S.C. § 441b(a).
3. Find reason to believe that the Douglas County Republican Central committee and Chris Miller, as treasurer, violated the following:
 - a) 2 U.S.C. § 441b(a); and
 - b) 2 U.S.C. §§ 433 and 434.
4. Approve the attached letters, Factual and Legal Analyses and Interrogatories.

Lawrence M. Noble
General Counsel

11-9-89
Date

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

- A. Referral Materials
- B. Proposed Letters (2) and Factual and Legal Analyses (2)
- C. Questions

20040802315

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Second District Republican)
Committee and Anita Heiman, as)
treasurer;)
Douglas County Republican Central)
Committee (Unregistered))
and Chris Miller, as treasurer)

RAD REFERRAL
#89L-12

(MUR
3014)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session on
November 28, 1989, do hereby certify that the Commission
decided by a vote of 4-1 to take the following actions
with respect to RAD REFERRAL 89L-12:

1. Open a MUR.
2. Find reason to believe that the Second
District Republican Committee and Anita
Heiman, as treasurer, violated 2 U.S.C.
§ 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).
3. Find reason to believe that the Douglas
County Republican Central Committee and
Chris Miller, as treasurer, violated
2 U.S.C. § 441b(a); 2 U.S.C. §§ 433
and 434; and 11 C.F.R. § 102.6(a)(1)(iv).

(continued)

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Federal Election Commission
Certification for RAD REFERRAL 89L-12
November 28, 1989

Page 2

4. Approve the letters, Factual and Legal Analyses and Interrogatories attached to the General Counsel's report dated November 9, 1989, subject to amendment in accord with the actions noted above.

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

Attest:

Dec 1, 1989
Date

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 7, 1989

Anita Heiman, Treasurer
Second District Republican Committee
Rte. 3, Box 147
Seneca, Kansas 66538

RE: MUR 3014
Second District Republican
Committee
Anita Heiman, as treasurer

Dear Ms. Heiman:

On November 28, 1989, the Federal Election Commission found that there is reason to believe the Second District Republican Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.6(a)(1)(iv), 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 along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against 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

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Anita Heiman, Treasurer
Page 2

pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

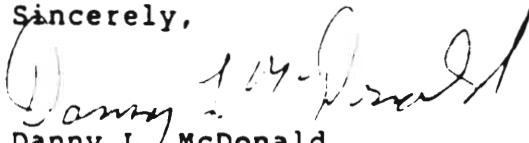
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories

20040302312



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 7, 1989

Chris Miller, Treasurer
Douglas County Republican
Central Committee
1505 Kasold
Lawrence, Kansas 66046

RE: MUR 3014
Douglas County Republican
Central Committee
Chris Miller, as treasurer

Dear Mr. Miller:

On November 28, 1989, the Federal Election Commission found that there is reason to believe that the Douglas County Republican Central Committee ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 433, 434, and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.6(a)(1)(iv), 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 along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against 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

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Chris Miller, Treasurer
Page 2

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.

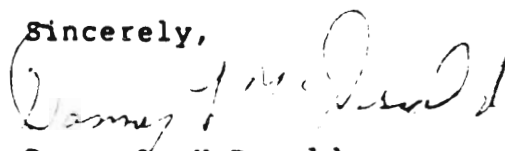
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,


Danny L. McDonald
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories

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DGC 4912

Douglas County Republican Central Committee

Ken Martinez, Chairman
Sandy Praeger, Vice-Chairman
Grace Marion, Secretary
Chris Miller, Treasurer

December 15, 1989

CERTIFIED MAIL

89DEC 19 AM 12:52

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

The Federal Election Commission

Washington, D.C. 20463

ATTN: Danny L. McDonald, Chairman

Re: M.U.R. 3014
Douglas County Republican Central Committee
Chris Miller, as Treasurer

Dear Mr. McDonald:

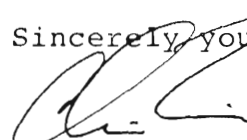
I have received, and thank you for your letter of December 7, 1989. After reviewing the materials which you have provided, I believe that the Douglas County Central Committee would be interested in pursuing what you describe as "pre-probable cause conciliation."

Consequently, I have not completed the interrogatories which you sent, and am forwarding no additional material with regard to this file, with the understanding that pre-probable cause conciliation will be considered.

If I am mistaken, with regard to the procedure that is to be followed, please let me know. Should you require additional information, in order to consider this matter for pre-probable cause conciliation, please let me know that as well.

I will take no further action with regard to this matter, until I receive additional direction from you. Thank you for your assistance.

Sincerely yours,



Chris Miller
Treasurer, Douglas County
Republican Central Committee

89DEC 19 AM 11:45

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FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

CM/af

cc: Mr. Doug Martin
Mr. Ken Martinez

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OFFICE OF GENERAL COUNSEL

89 DEC 29 PM 12:27

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Federal Election Commission
Washington, D.C. 20463

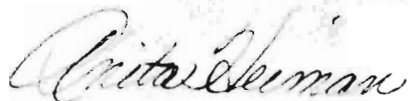
RE: M.U.R. 3014

Dear Mr. McDonald:

I am responding to your letter of December 7, 1989 and received on December 11th, 1989. I have gone over the materials you sent and I would ask that we be considered to pursue pre-probable cause conciliation.

Please contact me if the interrogatories or any other form must be completed with this process or additional information is needed.

I had assumed all reports had been accepted as submitted but I will gladly assist in any possible way to clarify this matter.



Anita Heiman, Treasurer
Second District Republican Committee
Route 3 Box 147
Seneca, KS 66538

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OGC 5227

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

January 23, 1990

90 JAN 29 PM 2:22

MS. Fran Hagan
Federal Election Commission
Washington, D.C. 20463

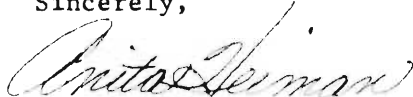
RE: M.U.R. 3014

Dear MS. Hagan

I am submitting to you the interrogatory informaion you requested. During our telephone conversation I had hoped to respond to this request immediately. I was unable to do so as the time span since the event made some questions, as advertising and agreements, impossible to answer without some research. The answers I have given are as accurate as I can determine.

Please contact me immediately if you require any further information.

Sincerely,



Anita Heiman
Treasurer
Second District Republican Committee
Box 147 Route 3
Seneca, KS 66538

Enclosure
bcc: Chris Miller, Treasurer
Doug Martin, Chairman

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FEDERAL ELECTION COMMISSION
90 JAN 29 PM 4:04

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INTERROGATORY ANSWERS

1, On July 5, 1988, the Douglas County Republican Central Committee transferred \$6,223.12 to the Second District Republican Committee.

(a) What representations were made to your committee concerning the source of the transferred funds? Who identified the source of funds.

(a) The chairman of our Committee accepted the check from the Douglas Co. organization. They were donated as part of a fund raiser they had organized, a golf tournament.

(b) Identify the source of those funds. To support your answer, provide documentation and explain the recordkeeping methods used.

(b) I have enclosed a copy of the deposit slip for the check received from Douglas County.

(c) Did the Douglas County Committee specify the intended use of the transferred funds? How were the funds actually used?

(c) The Second District is comprised of County organizations within the entire second district. It unified the parties in supporting party efforts in State wide and national positions and events.

2. (a) Did the transfer of funds consist primarily of proceeds from a fundraising event? IF so, identify the event. If not, identify the sources.

(a) The funds were all from a fund raiser, a golf tournament, sponsored by the Douglas County Republican Committee.

(b) Describe in detail the method of fundraising used for the event.

(b) I was not aware of the fundraiser and new to the position of Treasurer. The contacts I have made since stated it was an informal-fun type event-mostly golfers, using a get together and a few rounds of golf as a methods of fund raising.

3, WAS the event a joint fundraising effort by your committee and other unregistered or registered party committee.

(a) Identify the participants, the entities that benefited from the fundraisers.

(a) The participants were those who enjoy golf and those who benefited were the Douglas County and Second District Republicans.

(b) Name the fundraising representative/political committee responsible for recordkeeping and reporting of the event: collecting contributions, paying fundraising costs from gross proceeds and for disbursing net proceeds to each participant.

(b) Douglas County received the funds from the event, paid all costs and sent one half of the proceeds to the Second District.

80040326

(c) State the presentage and actual amount of proceeds allocated to and received by each participant: and state the precentage and amount of actual costs allocated to and paid by each participant. Provide a copy of any written agreement concerning the fundraising representative and the allocation formula of fundraising proceeds.

(c) All records of proceeds and costs are being reported by Douglas County. They sponsored the event with the assistance of Honorable Fletcher Bell, Commissiner of Insurance, as a fund raiser for the party. To my knowledge there was no agreement between the two organizations and if there was it was an informal agreement.

(d) Provide a copy of any joint fundraising notice included on solicitation materials for contributions.

(d) I did not have any material on advertising and do not believe it would have stated anything about a joint fund raiser. Douglas County sponsored this event and if such material is available they will submit it.

(e) State which account or accounts were used as depositories by the fundraiser participants for deposit of joint fundraiser receipts.

(e) A check was received from the Douglas Co. Committee and was deposited it directly into our account. They wrote one check to cover one half of the proceeds of the event when expenses had been met and submitted the check to our chairman who forwarded it to me for deposit in our account.

4. Describe in detail the relation ship between the Douglas County Republican Central Committee and the Second District Republican Committee.

The Second District Committee is composed of all Counties within their region. They each have a local committee or party organization and those groups are what comprise the second district. They each are based in a County unit, sometimes more organized than others. They meet individually, support local candidates, but attend our district meetings. Out District Officers, myself included, are chosen from all committees when we hold district meetings. It unites the party in regard to state and National issues, events and candidates.

The Second District has opened a separate state PAC account. Itsour hope that this type of situation will not develop again.

OGC 5190

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FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

MUR 30 W

INTERROGATORY ANSWERS

90 JAN 23 PM 10:54

All answers to these interrogatories are based upon the information I have been able to develop, my review of the available records, and my own understanding of the transactions in question. I was not Treasurer of the Douglas County Republican Central Committee when these events occurred, having been elected to that office in November, 1988. As indicated below, all questions have been answered to the best of my ability.

1. (a) The funds involved constitute a portion of the proceeds from a Golf Tournament, held to raise funds for regional Republican efforts. The funds are comprised of numerous donations, ranging from a low figure of twenty-five dollars (\$25.00) to a high donation of one thousand dollars (\$1,000.00).

The various donations were listed in a ledger, the pages of which were photocopied and are attached as Exhibit A. Checks for donations were also photocopied, and copies of those documents are attached, marked Exhibit B.

The donations were also reported, in accordance with Kansas State statutes, to the Kansas Public Disclosure Commission, in a Receipts and Expenditures Report, dated July 27, 1988, and filed with the Kansas Secretary of State.

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FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

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(b) Although I have no documentation beyond that already provided by myself and the Second District, it is my understanding that the funds transferred to the Second District on July 5, 1988, were intended to be used to support State and local candidates throughout the Second District. Obviously, since I was not serving as Treasurer for the Douglas County Republican Central Committee, my understanding of the intended use of these funds is based largely upon supposition and second-hand information, to which I became privy only after the transfer.

2. (a) The funds were derived almost solely from one fund-raising event, the Fletcher Bell Golf Tournament, sponsored by the Honorable Fletcher Bell, Kansas Commissioner of Insurance, on behalf of the local Republican Party Committees.

(b) Although I was not directly responsible for organizing the event, my understanding is that this fund-raiser was organized somewhat informally. Numerous individuals were contacted, largely golfers, and asked if they would like to participate, donating an entry fee. The funds received from those individuals were deposited in the account of the Douglas County Republican Central Committee, expenses incurred were dispersed appropriately, and the

remaining balance split equally between the Second District Republican Committee and the Douglas County Republican Central Committee. Prior to the fundraiser, only \$127.62 was in the account of the Douglas County Republican Central Committee. See Exhibit C.

3. The records indicate this was a joint fund-raising effort for both the Second District Republican Committee and the Douglas County Republican Central Committee.

(a) The entities which benefitted, the records indicate, were the Douglas County Republican Central Committee and the Second District Republican Committee, equally.

(b) The records indicate that the Treasurer of the Douglas County Republican Central Committee at that time, Justin, Hill, Jr. kept records of the event. He prepared the report to the Kansas Public Disclosure Commission regarding that time-period, as well as Exhibits A & B, as far as I know.

(c) As indicated above, the records indicate that all funds were deposited into an account held by the Douglas County Republican Central Committee, expenses were paid from that account, and the proceeds disbursed equally to the Second District Republican Committee and

the Douglas County Republican Central Committee. I am aware of no written agreement concerning allocation of the proceeds. I believe the agreement was of an informal nature.

(d) I am aware of no copy of a joint fund-raising notice, although one may have been disseminated.

(e) To the best of my knowledge, all of the funds were deposited in the general checking account of the Douglas County Republican Central Committee, account number 309362. A statement from that account, showing the balance prior to deposit of those funds, is enclosed.

- 9004080230
4. The Douglas County Republican Central Committee is composed of elected committee persons, who represent precincts within the County. It is a statutory committee, created by Kansas statutes, and serves as an organizational vehicle for party activities on the city and county level.

The Second District Republican Committee serves the entire Second Congressional District, and is comprised of elected delegates, chosen at meetings of the Douglas County Republican Central Committee. There are a number of County organizations, like the Douglas County Republican Central Committee, within the Second District.

9004080231

Although my knowledge of the relationship between the two is somewhat limited, my understanding is that the Douglas County Republican Central Committee, and the other County committees, provide support and a local organizational base for activities of the Second District Committee. In turn, the Second District serves to unite all of the County party efforts with regard to Statewide and national issues and events.

If additional information is required, a request for information might be better directed to either the Second District Chairman or the Chairperson of the Kansas Republican Party.

The foregoing answers are provided to the best of my own knowledge and belief, based upon review of the available records and my own knowledge of the events in question.



Chris Miller
Chairman, Douglas County
Republican Central Committee

AFFIDAVIT

Chris Miller, having first been duly sworn upon his oath, deposes and states that he has read the foregoing Interrogatory Answers, numbered One through Four, and their sub-parts; that to the best of his knowledge and belief, the Answers are complete and accurate; that at the time of the events described therein, he was not directly involved in those events; and that subsequently, as Treasurer of the Douglas County Central Committee he has acquired some knowledge of those events, as well as numerous pertinent records, related to those events, photocopies of which are marked as Exhibits thereto.

FURTHER SAITH AFFIANT NOT.

Chris Miller

Chris Miller
Chairman, Douglas County
Republican Central Committee

Subscribed and sworn to before me this 17th day
of January, 1990.

April Faircloth

Notary Public
April Faircloth

My appointment expires: 3/14/92



Date	CK #	Descrip	CK #	Cont	Disb	Date	CK #	Descrip	CK #	Cont	Disb
9/25		Donor J. Linn. Del. 1718 Clerk Ct. Linn. 6616	CL	50.00		2-17-88	291	K's Dept Revenue Taxes (Income) Due			10 ⁰⁰
10/14/87	292	ASK Assoc. Box 3885 Law KS - 2nd Dist. fundraiser mailing		44.00		2/22/88		Transfer from Sav - 150 ⁰⁰			
12/15/87	294	ASK Assoc. Box 3885 Law KS - Mailing Expense		149.17		2/24/88	300	U.S.D. 497 - case of H.S. Conference for Caucus			70 ⁰⁰
1/8/88	295	Lawrence Journal World Lyd Affidavit for party caucus	CK	25.48		2/3/88		Mulford Harkness, 615 County Club Ten. Law 66044	CS	20 ⁰⁰	
1/8/88	296	K.U. College Republicans 8 Brenda Eisdle, 1530 Engol Rd # 421 Law KS 66045	CK	75.00		3/3/88		Interest - Sav		99.15	
2/3/88		Int Rec - MM 9/30 (63.13) + 12/31 (99.46)	(Sav)	162.59		4/10/88	301	Dy City Fair Fair 2. Saw Park Saw Longhorn - booth rental			40.00
1-11-88		Ronald L. a Bernice T. del 715 Fairer Law KS 66044	CK	50.00		7/23/88	302	ASK Assoc - Box 3885 Law KS - Mailing Charges			69.75
2-2-88	297	ASK Assoc - Box 3885 Law KS - Mailing Exp, Caucus		38.41		4/6/88		Golf Tavern. Ronald J. Schessler 2207 Kenilworth Ct, Topeka 66606	CK	35.00	
2-18-88	298	FIRST N.H. Bank Internal Revenue Service Taxes due - 1120 - form 8109 del.		49 ⁰⁰		4/6		Dallas K. Murphy 3304 Aurumview Law 66044		35.00	
						4/6		G. Barney Byard, CLU 1 Transite Via 34 Suite 100 Topeka 66603		35.00	

8 8 8 2 0 8 0 4 0 0 6

EXHIBIT A

Date	CK #	Descrip	CK #	CS	Cont	D. b
6/6		James & Esther Wickenden 2705 Princeton, Law 66044			35.00	
6/6		Dan & Patricia James 1905 Camelback, Law 66046			35.00	
6/6		Thomas Gregg 3401 Harrison Topeka 66611			35.00	
6/6		R.E. & Barbara Grows 3100 Broadway Penn Tower Office Center Kansas City Mo 64111			35.00	
6/6		Rucker for Commissioner, Duane Nightingale Treas., 3701 SE Long, Topeka 66609			35.00	
6/6		Jonell Williams 700 Calis Lawrence 66044			35.00	
6/6		Paul D. Tompkins, Bldg Recd Box 4266 Topeka 66604			35.00	
6/6		Stephen & Mary Nanamaker 2306 Brookfield, Topeka 66614			35.00	
6/6		Harwood's Inc, 3103 IOWA Law, KS 66046			70.00	

Date	CK #	Descrip	CK #	CS	Cont	D. b
6/6		John C. Whitaker, P.A. 7440 Parallel, K.C. KS 66107			35.00	
6/6		KS INS Serv Systems Inc Suite 205 Citizens Bank Plaza Fort Scott, KS			35.00	
6/6		Manhattan Mutual Life Ins Co 8th & Reytz, Man. KS 66502			70.00	
6/6		Col John Orndorff & Glison Rt 2 Box 90-R Leav. 66048			125.00	
6/6		Col Orville N. Butts, 8 Reynolds Ave., FT Leav. 66027			125.00	
6/6		Col Thomas R. Gordon, Sec, CMD 16th Stess Coll, Ft Leav 66027-6900			125.00	
6/6		Mary Lou & Bela Hamilton 1302 Jackson Ct., Leav. 66048			125.00	
6/6		Joann Wiley 218 Summertree Law. KS 66044			125.00	
6/6		Thomas & Barbara Honey 1447 SW Oakley Ave, Topeka 66604			125.00	

Date	CK *	Descrip	CK a CS	Cont	D/B
6/6		Gregory or Pamela Maher 5914 S.W. 25 th St., Topeka 66614		125.00	
6/6		Schodera St Farms, LTD E. Blaine Schodera St, Box 5, Leawood 66871		125.00	
6/6		David or Judith Lortz 8517 Bradshaw, Lenexa 66215		125.00	
6/6		James K. & Ann Villamaria 6123 SW 26 th Ct D, Topeka 66614		125.00	
6/6		C.W. Hockathorn or Mary L. 3525 Oak Pkwy, Topeka 66614		125.00	
6/6		L. Jeremy Slaughter 5644 SW Eveningside Dr. Topeka 66614		125.00	
6/6		Kenneth Frahm, P.O. Drawer F Colby, KS 67701		125.00	
6/6		Marvin or Norma Gittman 12731 Glenfield, Leawood 66209		125.00	
6/6		W.J. George 10320 Howe Lane Leawood 66206		125.00	

Date	CK *	Descrip	CK a CS	Cont	D/B
6/6		Clinton C. Gchason 5859 SW 22 nd Terr, Topeka 66614		125.00	
6/6		Ronald or Kathleen Blum 3435 SW Adameda Dr., Topeka 66614		125.00	
6/6		Robert & Linn Fay 2511 Jesus, Law. 66046		125.00	
6/6		Patrick Hubbell 2028 Wildwood Lane, Topeka 66611		125.00	
6/6		Marvin or Norma Gittman 12731 Glenfield, Leawood 66209		125.00	
6/6		Dr. Ann Bernhard 880 Lee St No 501, No Plaines, IL 60016 (Address Crossed out)		125.00	
6/6		Michael R. O'Neal, Spue Rect, Box 2977, Hutchinson 67504-2977		125.00	
6/6		Wallace, Jr. or Phyllis Libby 1010 N 14 th Marysville 66508		125.00	
6/6		David G. Shriver, Bus Acct. 100 S. Main, Box 1313 Mcpherson, KS 67460		125.00	

Date	CK #	Descrip	CK #	Contrib	Dist	Date	CK #	Descrip	CK #	Contrib	Dist
6/6		KS Bankers Assoc Bank PAC-STATE- 1500 Merchants Natl Bldg, Topeka 66612		125.00		6/6		Holbrook, Ellis & Heaven, PA 757 Armstrong Box 1927 KC 66117		125.00	
6/6		Pete McGill & Assoc, 400 W. 8 th Suite 412, Topeka 66603		125.00		6/6		KGE-PAC Box 208 Wichita, KS 67201		125.00	
6/6		Sloan, Listrom, Eisenberth, Sloan & Glassman, 714 Capital Fed Bldg, Topeka 66603-3881		250.00 125.00	} 2 CKs	6/6		Thomas & Mary Stattery, 3431 NW 42 nd Topeka 66618		125.00	
6/6		Cigna Healthplan of KC, 32 Corp Bldg, Suite 700, 9225 Indian Creek Pkwy, Overland Park 66210		125.00		6/6		Derick J. Shaser 512 First Natl Bk Tower, Topeka 66603		125.00	
6/6		Kaiser Foundation Health Plan of KC 6900 Squibb Rd, Suite 201, Mission 66202		125.00		6/6		Steven L. Fowlston 1620 KS State Bank & Trust - 125 N. Market Wichita, KS 67202		125.00	
6/6		Holbrook, Ellis & Heaven, P.A. 727 Grand Ave Box 1279 KC KS 66117		125.00		6/6		Goodell, Stratton, Edmunds & Palmer, 215 E 8 th Topeka 66603		125.00	
6/6		Woodard, Blaylock, Hernandez, Plymmer & Roth, Attys - Wichita, KS		125.00		6/6		Citizens Mutual Ins Assoc Box 2108, Olathe 66061		125.00	
6/6		Meyersdick Title Co, 1901 W. 47 th Pl Suite 300, Westwood, 66205		125.00		6/6		Norris Services, Inc. 400 N. Woodlawn, Suite 113, Wichita 67208	4531	125.00	
6/6		B.C. Christopher Securities Co Kansas City Mo -		125.00		6/6		Stevens, Brand, Lungstram, Golden & Winter - Box 1200 Law 66041		125.00	

Date	ck #	Desc	ck #	Cont	Disb	Date	ck #	Disb	ck #	Cont	Disb
6/6		Victor D. Blakely 6736 S.W. Oylesbury Rd, Topeka 66610		125.00		6/6		The American Home Life Ins Co 400 K's Ave, Topeka 66601		250.00	
6/6		John + Irene Vogel 1588 Eblorado Lawn 66046		125.00		6/6		Fletcher or Mona J. Bell 2519 Jasin Dr., Law 66046		375.00	
6/6		Thomas E. Gleason, 420 W. 4 th Ottawa 66067		160.00		6/6		Logan + Logan, Attys, 3500 W. 75 th Suite 302, Prairie Vill. 66208		375.00	
6/6		Kenneth + Sheila Martinez 2239 West Dr., Law 66046		160.00		6/6		Care PAC of Ks, Blue Cross + Blue Shield		500.00	
6/6		David R. Brant, Ellinwood, KS		250.00		6/6		John W. Graham 311 N. Broadway Leavenworth 66048		500 ⁰⁰	
6/6		Jody + Patricia Olberding 3000 Skylark Dr, Topeka 66605		250.00		6/6		Security Benefit Group, Inc. 700 Harrison, Topeka 66636-0001		500 ⁰⁰	
6/6		KS Life Underwriters Assoc Political Action Comm. Hse Box 2639 Topeka 66601		250.00 375.00	2 CKs.	6/6		Redington + Brown, LTD, Suite 100, Security Bldg, KC 66101		500 ⁰⁰	
6/6		BMA PAC-Kansas Box 419458 K.C. Mo 64141		250 ⁰⁰		6/6		Carpenter, Hein, Carpenter + Weir, Chartered, Client Acct 5425 S.W. 7 th St. Box 4287 Topeka 66604		500 ⁰⁰	
6/6		Perry + Hamil, 4650 College Blvd Suite 300, Overland Park 66211		250.00		6/6		American Investors Life Ins Co 415 S.W. 8 th Ave Box 2039 Topeka 66601		625.00	

Date 6/6	ck #	Desc	ck or CS	Cont	Disb	Date 6/9
		Victory Life Ins Co 300 S.W. 8 th Topeka 66603-3984		1,000 ⁰⁰		
6/7	303	Alvamar - Cante, Greensboro, dinner - FBO			3668.75	6/9
6/7	344	Alvamar - Giff Giff - Hatchey Bill gann		50.00		6/9
6/8	35	Alvamar - beer for FBO		195.00		6/9
6/9		David G. Miller 1312 Fir St Eudora, 66025-9423	ck	25.00		6/9
6/9		Hudson, Malles + Reynolds, Citizens Natl BK Plaza, Suite 200, Ft Scott 66701	ck	35.00		6/9
6/9		James or Jane Cates, 5500 SW 31 st Tenn, Topeka 66614	ck	35.00		6/9
6/9		Leroy or Linda Brunsford, 5618 W. 18 th , Topeka 66604	ck	35.00		6/9
6/9		Gary or Shirley Austerman, 7305 Norfolk, Wichita 67206	ck	35.00		6/9
6/9		Joann Flower, RR 2 Box 2 Oskaloosa, KS 66066	ck	35.00		

ck #	Desc	ck or CS	Cont	Disb
	Kenneth J. Meinhardt, 1036-106 Fleming Ct., Topeka 66604	ck	35.00	
	Wint Winter, Jr. 502 1 st Natl Bk, Law 66044	ck	50.00	
	Herbert Weidensaul, Gert Gert 315 Providence, Law 66044	ck	75 ⁰⁰	
	Jerry + Elsie Stovall, 188 ²⁷¹⁰⁴ Hatherton Way, Winston-Salem NC	ck	125.00	
	Timothy or Stephanie Elliott 3913 S.W. Dixie Ct., Topeka 66614	ck	125 ⁰⁰	
	Carol + Chris Gwyer 1630 Withdean Rd., Topeka 66611	ck	125.00	
	Lore + Steven Montgomery 112 Box 354, Meriden 66512	ck	125.00	
	Cimarron Life Ins Co 5400 W 45 th Prairie Village 66207	ck	125.00	
	Robert + Arlene Pister 8236 Santa Fe Dr Overland Park ks 66204	ck	125.00	

Date	ck #	Descrip	ck #	Cont	Disb	Date	Pase	ck #	Cont	Disb
6/9		Perry & Hamill, 4650 College Blvd Suite 200, Overland PK 66211	ck	125.00		7/50/88	Gift Received - Sec		99.35	
6/9		Ronald & Dorance Todd 715 Furrow Ave, Law 66044	ck	160 ⁰⁰		7/7/88	309 City of Law - Utilities Dept.			35.00
6/9		Kurt & Ann Scott, 3601 SW Eveningstar Dr., Topeka 66614	ck	250 ⁰⁰		7/11/88	310 Wells Investment Co 4401 Nell Suite 101, Shawnee Mission KS 66207		941.50	
6/9		Morris & Larson, P.C. 6900 College Blvd Suite 800, Over. PK 66211	ck	500 ⁰⁰		7/1/88	311 Newwood for Representative			500.00
6/9		Wallace, Saunders, Austin, Brown & Enoch, Overland, 10111 Santa Fe Dr., Box 12290, Over. PK 66212	ck	800 ⁰⁰		7/20/88	children, Alderant Mfg. Inc. 1610 SW Topeka, Box 237, Topeka Sept 1/2		35.00	
7/6/88		IN KIND - Dick & Mildred Allen, Baldwin - \$50 for booth space, Maple Leaf Festival			Golf Tournament	8/1/88	312 Southwestern Bell Tel Co P.O. Box 333 Topeka 66634-0001 Checkbook exp. 28.22			298.20
7/2/88	38	2nd Dist Repub Party -	ck		6,223.12	8/5/88	313 Journal Under Box 84 Lawrence 66044			61.05
7/6/88	37	KR Gas Service - Deposit			200 ⁰⁰	8/11/88	314 Southwestern Bell Tel Co. 501 E. Panner Suite 200, P.O. 23 Wichita, KS 67201			245.00
7/6/88	35	ASK ASSOCIATES - Mailing Expense - newsletter			437.48					
7/7		Transfer 3000 to Sec								

DAVID G. MILLER

J3J8N1

1312 FIR ST. 913-542-2000

EUDORA, KS 66025-0423

4002

83-407/1011

7 June 88

PAY TO THE
ORDER OF

Do GOP / Fletcher Bell Inc \$ *25*
Twenty five DOLLARS



Kaw Valley Bank

739 MAIN
EUDORA, KANSAS 66025

David G Miller

MEMO

⑆101104973⑆ 4002 05410 0⑈

HUDSON, MULLIES, & REYNOLDS 972

ATTORNEYS-AT-LAW

CITIZENS NATIONAL BANK PLAZA, SUITE 200

FORT SCOTT, KS 66701

3823

June 2 19 88

83-56
1011

PAY
TO THE
ORDER OF *Republican Party*

\$ 35.00

Thirty-five and NO/100

DOLLARS

The Citizens
National Bank

(316) 223-1200 200 S. MAIN FORT SCOTT, KS 66701

FOR *Non-Golfer Donation*

[Signature]

⑈00003823⑈ ⑆101100566⑆ ⑈000 1317⑈

JAMES W. OR JANE L. CATES

40367-9

5500 SW 31ST TERRACE 913 272-7616

TOPEKA, KS 66614

2663

5-20 19 88

40-8011/3011

Pay to the
order of

Republican Party - Golf

\$ 35.00

Thirty Five Dollars Dollars

Credit

Union 1 of Kansas

610 W. 10th Street Topeka, Kansas 66612

PAYABLE THROUGH KANSAS CORPORATE CREDIT UNION, WICHITA, KS

For

James W. Cates

⑆301180111⑆ 04294 ⑈ 2663

Rocky Mountain Bank Note 5-2

LE ROY OR LINDA K. BRUNGARDT 868

H1SBU1

5618 W. 18TH 272-7901

TOPEKA, KS 66604

9576

May 17 19 88

44-114/1011

PAY TO THE
ORDER OF

Republican Party - Golf

\$ 35.00

Thirty five & 00/100 DOLLARS



Capital City Bank & Trust Co.

P.O. Box 1433

Topeka, Kansas 66601



LeRoy Brungardt

EXHIBIT B

GARY M. OR SHIRLEY D. AUSTER
7305 NORFOLK 316 686-4774
WICHITA, KS 67206

221

May 13 1988

40-54/1011

PAY TO THE
ORDER OF

Republican Party - GOLF \$ 35⁰⁰

Thirty Five & No/100

DOLLARS



UNION NATIONAL BANK
P.O. BOX 637 • 316-261-4700
WICHITA, KANSAS 67201

FOR NOT ATTENDING

Gary M. Auster

⑆101100540⑆2216 725 6043⑆

Rocky Mountain Bank Note



JOANN FLOWER
R. R. 2, BOX 2 913-863-2918
OSKALOOSA, KS 66066

764

June 4 1988

83-534/1011

Pay to the
order of

Republican Party - GOLF \$ 35⁰⁰

Thirty five and No/100

Dollars

The Bank of
McLOUTH, KANSAS



MEMO NON-GOLFER DONATION

Joann Flower

⑆101105341⑆0764⑆211680⑆

KANSANS FOR MEINHARDT
1036-100 FLEMING CT. 913-271-5944
TOPEKA, KS 66604

1021

June 5 1988

44-72/1011

PAY TO THE
ORDER OF

Hatcher Bell Golf Tournament \$ 35.00

Thirty five

DOLLARS



Commerce Bank & Trust
TOPEKA, KANSAS

MEMO

Entry fee

Rozamary Boston

⑆101100726⑆134⑆090⑆1⑆1021

WINTON A. WINTER, JR., ATTY-AT-LAW
502 - 1ST NATIONAL BANK 913 843-0811
LAWRENCE, KS 66044

1810

6/7 1988

83-92/1011

Pay to the
order of

Douglas County Repub. Party - \$ 50.00

Fifty & No/100

Dollars

Peoples

National Bank & Trust
Ottawa, Kansas 66067

11000000

HERBERT H. WEIDENSAUL

CONSTRUCTION ACCOUNT

315 PROVIDENCE

LAWRENCE, KANSAS 66044

5101

PAY TO THE ORDER OF

REPUBLICAN PARTY-GOLF

JUNE 7 1988

82-43
1011

\$ 75.00

HERBERT H. WEIDENSAUL 75 DOLS 00 CTS

DOLLARS



Lawrence National Bank

(913) 841-5555

647 Massachusetts

Lawrence, Kansas 66044

HERBERT H. WEIDENSAUL

FOR

⑈005101⑈ ⑆101100430⑆

8029229⑈

JERRY C. STOVALL

ELSIE STOVALL

188 HEATHERTON WAY 765-8506
WINSTON-SALEM, NC 27104

987

MAY 18, 1988

86-197
531

PAY TO THE ORDER OF

Republican Golf

\$ 125.00

One hundred twenty-five & 00/100 DOLLARS



SOUTHERN NATIONAL BANK

OF NORTH CAROLINA

WINSTON-SALEM, NORTH CAROLINA 27103

MEMO

⑆053101972⑆ 34⑆ 254499⑈0987

TIMOTHY G. OR STEPHANIE A. ELLIOTT

3913 SW. DIXIE CT. 273-5339
TOPEKA, KS 66614

1746

6/2 1988

44-72/1011

PAY TO THE ORDER OF

Republican Party Golf

\$ 125.00

One hundred twenty-five & 00/100 DOLLARS



Commerce Bank & Trust

TOPEKA, KANSAS

MEMO

95.25 contribution

⑆101100728⑆ ⑈58⑈ 796⑈6⑈ 1746

CAROL J. OR CHRIS N. COWGER

1630 WITHDEAN RD. 235-0338
TOPEKA, KS 66611

5898

6-1 1988

44-72/1011

PAY TO THE ORDER OF

Republican Party Golf

\$ 125.00

One Hundred & Twenty-Five & 00/100 DOLLARS



Commerce Bank & Trust

TOPEKA, KANSAS

FB Toney

Chris Cowger

LORI M. CALLAHAN
STEVEN C. MONTGOMERY
P. R. 2, BOX 364 484-2561
MERIDEN, KS 66512

2528

6/7 1988

44-113/1011

PAY TO THE
ORDER OF

REPUBLICAN PARTY - GOLF

\$ 125.00

One hundred twenty five and no/100 DOLLARS



Highland Park
Bank & TRUST
TOPEKA, KANSAS 66605

Lori M. Callahan

MEMO

1011011381 50 788 11 2528

CIMARRON LIFE INSURANCE COMPANY

5400 W. 95TH 381-0300
PRAIRIE VILLAGE, KS 66207

1051

PAY
TO THE
ORDER OF

Republican Party Golf

6/7 1988

83-7103
3011

\$ 125.00

One hundred twenty five and no/100 DOLLARS

PIONEER SAVINGS
5400 W 95th
(95th & Nall)
Prairie Village, KS 66207

FOR

R. W. Wom

001051 3011710361 021700253107

ROBERT E. EISLER, JR.
ARLONE C. EISLER

8236 SANTA FE DRIVE 642-5613
OVERLAND PARK, KS 66204

1761

18-34/1010

PAY TO THE
ORDER OF

Fletcher Bell Golf Putting

June 1 1988

\$ 125.00

One hundred and twenty five and no/100 DOLLARS



The
Merchants - Westport
Bank Office
331 Westport Road - Kansas City, Missouri 64111

Robert E. Eisler, Jr.

001761 1010003491 0600230641

PERRY & HAMILL

ATTORNEYS-AT-LAW

4650 COLLEGE BOULEVARD, SUITE 300 491-5500
OVERLAND PARK, KS 66211



COLLEGE
BOULEVARD
NATIONAL
BANK

4650 College Blvd. • Overland Park, KS 66211

9216

83-331/1010

PAY

**One Hundred Twenty-Five and No/100

7

Fletcher Bell & Douglas County

DATE

AMOUNT

Ronald L. Todd 10-68
and/or Bernice G. Todd
715 Forrest Avenue 842-4264
Lawrence, Kansas 66044

7701

June 3, 1988

83-1464/1011

Republican Party Golf open \$ 160.⁰⁰

One Hundred and Sixty and ⁰⁰/₁₀₀



Douglas County Bank
Lawrence, Kansas 66044

125.⁰⁰ Golf 35.⁰⁰ picnic Bernice G. Todd

⑆01114646⑆ 7701 26280 3⑈

KURT OR PAM SCOTT

3601 SW. EVENINGSIDE DR. 913-272-2540
TOPEKA, KS 66614

6-6-1988

44-72/1011

PAY TO THE
ORDER OF

Republican Party Golf

\$ 250.⁰⁰

Two hundred fifty dollars and ⁰⁰/₁₀₀

DOLLARS



Commerce Bank & Trust
TOPEKA, KANSAS

Pam Scott

⑆01100728⑆ ⑈24⑈765⑈0⑈ 0700

MORRIS & LARSON, P.C. 587
6900 COLLEGE BLVD., SUITE 800
OVERLAND PARK, KS 66211



First National Bank
OF OVERLAND PARK
College Boulevard and Metcalf
P.O. Box 7568
Overland Park, Kansas 66207

3998

June 6 1988

83-414/1010

PAY Five Hundred and No/100----- DOLLARS \$ 500.00

TO
THE
ORDER
OF

Republic PARTY GOLF

Deanne Chismox
W. Robert King

⑈00003998⑈ ⑆010100414⑆

00 455 3⑈

WALLACE, SAUNDERS, AUSTIN, BROWN & ENOCHS, CHARTERED

64392

ATTORNEYS

10111 SANTA FE DRIVE, P. O. BOX 12290 888-1000
OVERLAND PARK, KS 66212

6-8 1988

83-978/1010

PAY TO THE
ORDER OF

Republican Party

\$ 800.00

Eight Hundred & no/100

DOLLARS

The Overland Park State Bank
AND TRUST COMPANY
19131 648 2800 BOX 4308
OVERLAND PARK, KANSAS 66204

WALLACE, SAUNDERS, AUSTIN,
BROWN & ENOCHS, CHARTERED ATTORNEYS

[Signature]

⑈00064392⑈ ⑆101009780⑆ ⑈10⑈732⑈8⑈

DELUXE CHECK PRINTERS

JOHN W. GRAHAM 382
311 N. BROADWAY 682-0995
LEAVENWORTH, KS 66048

380

5/13 19 88

83-10/1011

PAY TO THE
ORDER OF

Republican Party (Golf) \$ 500.00
Five hundred and no one hundredths DOLLARS



The Leavenworth National Bank
& Trust Company
LEAVENWORTH, KANSAS 66048

MEMO

John Graham

⑆101100100⑆ 0380 ⑈0355291⑈

SECURITY BENEFIT GROUP, INC.
700 HARRISON TOPEKA, KANSAS 66636-0001
AP 40

BANK IV TOPEKA, K.A.
TOPEKA, KANSAS

44-15
1011

NO. 0000015823

DATE

MAY 19, 1988

PAY EXACTLY \$*****500.00*****

*****FIVE HUNDRED AND 00/100 -----

TO
THE
ORDER
OF

REPUBLICAN PARTY-GOLF
FLETCHER BELL
PO BOX 924
LAWRENCE, KS 66044

James Woods

⑈0000015823⑈ ⑆101100155⑆

11 274 711

BODDINGTON & BROWN, CHTD.

ATTORNEYS-AT-LAW

SUITE 100, SECURITY BANK BLDG.
KANSAS CITY, KS 66101

24551

PAY
TO THE
ORDER OF

Republican Party - Golf \$ 500.00
Five Hundred and 00/100 DOLLARS



SECURITY
BANK
OF KANSAS CITY

FOR

Loren Polayre

⑈024551⑈ ⑆101000925⑆ 102 009983⑈

FLETCHER OR MONA J. BELL 876
2519 JASU DR. 843-4219
LAWRENCE, KS 66046

5335

83-1464/10

June 1 1988
Republican Party - Golf
PAY TO THE ORDER OF
Three hundred seventy-five and 00/100
\$375.00
DOLLARS



Douglas County Bank
Lawrence, Kansas 66044

Fletcher Bell

⑆101114646⑆ 5335 33784 6⑈

LOGAN & LOGAN
ATTORNEYS-AT-LAW
913-362-1170
3500 W. 75TH STREET, SUITE 302
PRAIRIE VILLAGE, KS 66208

4230

PAY TO THE
ORDER OF

Republican Party - Golf
Three hundred seventy-five and 00/100
\$375.00
DOLLARS



FIRST CONTINENTAL
BANK & TRUST
Overland Park, Kansas 66204

FOR

FLETCHER BELL OPEN

David J. Vozell

⑈004230⑈ ⑆101001173⑆

⑈581887⑈

KANSAS LIFE UNDERWRITERS ASSOC. 887
POLITICAL ACTION COMMITTEE
P. O. BOX 2639 913-234-3491
TOPEKA, KS 66601

1030

PAY
TO THE
ORDER OF

REPUBLICAN PARTY - GOLF

May 17 1988

44-114
1011

\$ *375.00*

Three hundred seventy-five and no/100-----
DOLLARS



Capital City Bank & Trust Co.
P.O. Box 1433
Topeka, Kansas 66601

FOR

Don E. Indican

⑈001030⑈ ⑆101101141⑆ 1147557⑈

CARE PAC OF KANSAS 985
BLUE CROSS & BLUE SHIELD

199

5-2-88

44-16/1011

Pay to the
order of

Republican Party - Golf
Five hundred and 00/100
\$500.00
DOLLARS



Merchants
National Bank

PERRY & HAMILL

ATTORNEYS-AT-LAW

4650 COLLEGE BOULEVARD, SUITE 300 491-5500
OVERLAND PARK, KS 66211



4650 College Blvd. • Overland Park, KS 66211

9226

83-331/1010

PAY

**Two Hundred Fifty and No/100

TO
THE
ORDER
OF

Republican Party -- Golf
Fletcher Bell
P. O. Box 924
Lawrence, Kansas 66044

DATE

AMOUNT

5/23/88

\$250.00

Sam J. Austin

⑈00009226⑈ ⑆101003317⑆ 011304⑈

DELUXE CHECK PRINTERS

SLOAN, LISTROM, EISENBARTH, SLOAN & GLASSMAN

714 CAPITOL FEDERAL BUILDING 357-6311
TOPEKA KANSAS 66603-3881

60701

CHECK NO.

44-67
1011

60701

TWO HUNDRED FIFTY----DOLLARS AND 00/100

PAY TO THE ORDER OF

DATE

AMOUNT

5/04/88

\$250.00

REPUBLICAN PARTY GOLF
LAWRENCE KS

Patricia A. Reed

THE FIDELITY BANKS
TOPEKA, KANSAS 66603

⑈060701⑈ ⑆101100676⑆ ⑈01 241 6⑈



MERCHANTS NATIONAL BANK
TOPEKA, KANSAS

400 Kansas Avenue
Topeka, Kansas 66601

CHECK NUMBER 108799

44-16
1011

MO	DAY	YR
05	09	88

PAY THIS AMOUNT
***250.00

The AMERICAN HOME LIFE INSURANCE CO.



REPUBLICAN PARTY -- GOLF

TO
THE
ORDER
OF

PRES. V. PRES. SEC. OR ASS. SEC.
CHECK AT OVER ALL VALID ONLY IF COUNTERSIGNED



THE PEOPLES STATE BANK
AND TRUST COMPANY

83-301/1011

PAY TO THE ORDER OF Republican Party - Golf \$ 250.00
Two hundred fifty dollars and 00/100 DOLLARS

ACCOUNT NUMBER

David R Brant

Fletcher Bell Golf Tournament

⑆101103916⑆ ⑈10 081 1⑈

JODY R. OR PATRICIA S. OLBERDING

LIC. C1E0B1

3000 SKYLARK DR. 266-8422

TOPEKA, KS 66605

758

5-23 19 88

44-72/1011

PAY TO THE ORDER OF

Republican Party Golf

\$ 250.00

Two hundred Fifty & no/100 DOLLARS



Commerce Bank & Trust
TOPEKA, KANSAS

June 7th Topeka

⑆101100728⑆ ⑈22 725 00⑈ 0788

KANSAS LIFE UNDERWRITERS ASSOC. 887

POLITICAL ACTION COMMITTEE

P. O. BOX 2639 913-234-3491

TOPEKA, KS 66601

1033

June 2 19 88

44-114
1011

PAY TO THE ORDER OF REPUBLICAN PARTY-GOLF

\$ *250.00*

Two hundred fifty and no/100 DOLLARS



Capital City Bank & Trust Co.

P.O. Box 1433

Topeka, Kansas 66601

FOR

⑈001033⑈ ⑆101101141⑆ 1147557⑈

BMA PAC - KANSAS

P. O. BOX 419458

KANSAS CITY, MO 64141

1002

PAY TO THE ORDER OF

Republican Party - Golf

\$ 250.00

Two hundred fifty & no/100 DOLLARS



Commerce Bank
of Kansas City
Kansas City, Missouri 64141

May 17 19 88

18-1/1010

VICTOR D. BLAKELY
6736 S.W. AYLESBURY RD.
TOPEKA, KS 66610

May 24 1988

44-55
1011

PAY TO THE ORDER OF Republican Party-Golf

\$ 125.00

One hundred twenty five and no/00----- DOLLARS

TB TOPEKA BANK
and TRUST COMPANY
P.O. BOX 56, TOPEKA, KANSAS 66601

Victor D. Blakely

FOR

⑈004705⑈ ⑆101100553⑆

⑈002429⑈

JOHN H. VOGEL
IRENE S. VOGEL
1568 EL DORADO DR.
LAWRENCE, KS 66046

8687

83-1464
1011

PAY TO THE ORDER OF Republican Party - Golf

May 23 1988

\$ 125.00

One Hundred Twenty Five and no/100----- DOLLARS

 **Douglas County Bank**
Lawrence, Kansas 66044

FOR

⑈00008687⑈ ⑆101114646⑆

02155 5⑈

John H. Vogel

THOMAS E. GLEASON
420 W. 4TH
OTTAWA, KS 66067

7390

83-92/1011

Pay to the order of Republican Party - Golf

\$ 160.00

One Hundred Sixty and no/100----- Dollars

Peoples National Bank & Trust
Ottawa, Kansas 66067

For 2 - Elmer Ballou *Elmer Ballou*

⑆101100922⑆ ⑈32 614 3⑈ 7390

KENNETH A. MARTINEZ
SHEILA A. MARTINEZ
2239 WEST DRIVE 842-7401
LAWRENCE, KS 66044

6477

83-43/1011

Pay to the order of Republican Party - Golf

\$ 160.00

one hundred sixty and no/100----- Dollars

 **Lawrence National Bank**
(913) 841-5555
647 Massachusetts
Lawrence, Kansas 66044

SILVER STAR

Sheila A. Martinez

Patrons Mutual Insurance Association

BOX 2108 - OLATHE KANSAS 66061

No. G-077818

83-191
1010

BANK IV
OLATHE KANSAS

77818

VOID AFTER 6 MONTHS

DATE		
MO.	DAY	YR
5	25	88

DOLLARS	CENTS
****125	00

Pay to the order of

REPUBLICAN PARTY-GOLF

PATRONS MUTUAL **125.00 CTS**

Clas A. Archer

COUNTER SIGNATURE REQUIRED IF OVER \$25,000.00

⑈077818⑈ ⑆101001911⑆

110 147 9⑈01

NORRIS SERVICES, INC.

400 N. WOODLAWN, SUITE 113 685-5621
WICHITA, KANSAS 67208-4331

6762

83-1466
1011

PAY
TO THE
ORDER OF

Republican Party - GOLF

MAY 27 19 *88*

\$ *125.00*

ONE hundred Twenty five and no/100 DOLLARS

Arkansas Valley State Bank
Valley Center, Kansas 67147

FOR

Donation & Golf

Donald F. Jones

⑈006762⑈ ⑆101114662⑆

110736⑈

STEVENS, BRAND, LUNGSTRUM,
GOLDEN & WINTER
ATTORNEYS-AT-LAW
P. O. BOX 1200 913-843-0811
LAWRENCE, KS 66044

18381

83-148
1011

*Pay to the
Order of*

Republican Party - Golf

may 27 19 *88*

\$ *125.00*

One hundred Twenty five & no cents — *Dollars*

FIRSTBANK
LAWRENCE, KS 66044

STEVENS, BRAND, LUNGSTRUM, GOLDEN & WINTER

For JWB Golf Contribution

John B. Jones

⑈01838⑈ ⑆101101484⑆

⑈000590⑈

WOODARD, BLAYLOCK
HERNANDEZ, PILGREEN & ROTH
ATTORNEYS-AT-LAW
GENERAL ACCOUNT

WICHITA STATE BANK WICHITA, KANSAS 67201

20776

May 11 19 88

40-84/1011

PAY One hundred twenty five dollars and no/100-----DOLLARS \$ 125.00

TO
THE
ORDER
OF

Republican Part - Golf

Cynthia Major

⑈00020776⑈ ⑆101100841⑆ 00 3464 9⑈

DELUXE CHECK PRINTERS

MEYERDIRK TITLE COMPANY
1801 W. 47TH PLACE, SUITE 300
WESTWOOD, KANSAS 66205
(913) 236-6707

MARK TWAIN BANK OF KANSAS CITY
106 W. 11th - KANSAS CITY, MO 64105

18-73/1010

0006136

DATE
05/09/88

CHECK AMOUNT

\$125.00

PAY One Hundred Twenty Five and no/100 Dollars

TO
THE
ORDER
OF

Republican Party - Golf
& Fletcher Bell
Post Office Box 924
Lawrence, Kansas 66044

VOID AFTER 90 DAYS

Mark A. Meyer *Mark D. Helt*

⑈006136⑈ ⑆101000734⑆ 1010053694⑈

SINCE 1878

No.032191

B. C. Christopher Securities Co. Kansas City . Mo.
COMMODITIES & SECURITIES

EXACTLY
EST27 **125 AND 00 CTS**

18-1
1010

PAY

TO
THE
ORDER
OF

Republican Party

DATE 05/17/88

\$ 125.00

B. C. CHRISTOPHER SECURITIES CO.

COMMERCE BANK OF KANSAS CITY
KANSAS CITY, MISSOURI

Mark A. Helt

⑈032191⑈ ⑆101000019⑆ ⑈2330⑈

CIGNA HEALTHPLAN OF KANSAS CITY, INC.
32 CORPORATE WOODS SUITE 700
9225 INDIAN CREEK PARKWAY
OVERLAND PARK, KS 66210

CIGNA

REPUBLIC BANK BROWNWOOD
P.O. BOX 940
BROWNWOOD, TX 76801

8-185
1119

13267

DATE
5-11-88

CHECK NO
13267

PAY THIS AMOUNT		
125	DOLLARS	00 CENTS

AMOUNT OF CHECK
\$125.00

PAY
TO
THE
ORDER
OF

Republican Party - Golf

Robert Bradford

TWO SIGNATURES REQUIRED OVER \$1000.00

⑈013267⑈ ⑆111901551⑆ 491 609 3⑈

KP-FD-190-1287

KAISER FOUNDATION HEALTH PLAN
OF KANSAS CITY, INC.

6900 SQUIBB RD., SUITE 201 913-384-9090
MISSION, KS 66202



MidAmerican Bank
and Trust Company
202 AVENUE AT 80TH TERRACE
P.O. BOX 2947
SHAWNEE MISSION, KANSAS 66201

023166

83-1463/1010

May 11 1988

PAY

KAISER FOUNDATION HEALTH PLAN
OF KANSAS CITY, INC. 125 and no/100

DOLLARS \$ 125.00

TO
THE
ORDER
OF

Commissioner Bell Golf Outing

⑈0023166⑈ ⑆101014636⑆

00847 8⑈

HOLBROOK, ELLIS & HEAVEN, P.A.

ATTORNEYS-AT-LAW

727 ANN AVE.

P. O. BOX 1279

KANSAS CITY, KS 66117

Mission Hills
BANK

2001 Johnson Drive
Mission Hills, KS 66205

11359

83-403/1010

May 27, 1988

PAY

ONE HUNDRED and TWENTY-FIVE and no/100

DOLLARS \$ 125.00

TO
THE
ORDER
OF

REPUBLICAN PARTY - GOLF

Ellis Heaven

⑈00011359⑈ ⑆101001011⑆

DEE ANN BERNHARD 8-43

198

5-27 1988

70-2500/

PAY TO THE
ORDER OF

Republican Party - Golf

\$ 125.00

One hundred twenty-five

DOLLARS

Northern Trust Bank/Woodfield

1501 Woodfield Road
Schaumburg, Illinois 60196

MEMO

Dee Ann Bernhard

⑆071925004⑆ ⑈30 16002704⑈ 0198

MICHAEL R. O'NEAL

1101

SPECIAL ACCOUNT

BOX 2977 PH. 662-0537

HUTCHINSON, KS 67504-2977

5/30

1988

83-21
1011PAY TO THE
ORDER OF

Fletcher Bell Open

\$ 125.00

One hundred twenty-five 100/100

DOLLARS

Hutchinson National Bank

and Trust Company

One Polaris Plaza • Hutchinson, Kansas 67501

MEMO

2nd Dist. Foundation

⑆101100210⑆ 76 608 9⑈ 1101

WALLACE L., JR. OR PHYLLIS LIBBY

1010 NORTH 14TH

MARYSVILLE, KANSAS 66508

2393

6-1

1988

83-953/1011

Pay to the
order of

Republican Party - Golf

\$ 125.00

One Hundred & Twenty-five 100/100

Dollars

THE

Munden State Bank

P.O. BOX 100 MUNDEN KANSAS 68058



For Donlin

Wallace L. Libby Jr.

⑆101109538⑆

005627⑈8⑈

DAVID G. SHRIVER

BUSINESS ACCOUNT

100 S. MAIN 316-241-7977

P. O. BOX 1313

MC PHERSON, KS 67460

1403

PAY
TO THE
ORDER OF

Republican Party - Golf

June 3, 1988

83-159
1011

\$ 125.00

One Hundred Twenty-five and no/100-----

DOLLARS

HOME STATE BANK
& TRUST CO.

McPHERSON, KANSAS 67460

Donation - 6/7 - Lawrence

R. + A. Wh...

RONALD W. OR KATHLEEN R. BLUM
3435 SW ALAMEDA DRIVE #13 279-3839
TOPEKA, KS 66614

3756

5-24 1988

83-7067/3011

Pay to the
order of

\$125.00
Dollars

Columbia Savings

A FEDERAL ASSOCIATION
1635 Fairview Road / Topeka, Kansas 66604-2411

For

⑆30117067⑆ 030800015508⑈ 3756

Rocky Mountain Bank Note

TED F. FAY
JO ANN FAY
2511 JASU
LAWRENCE, KS 66048

Schwab 1

105

5/24 1988

11-35
1210

Pay To The
Order Of

\$125.00

Dollars

Bank of America

Schwab One Service Center #1145
500 ELLIWOOD WAY
P.O. BOX 232010
PLEASANT HILL, CA 94523

For

⑆121000358⑆0105⑈11717⑈34695⑈



PATRICK R. HUBBELL 470
2028 WILDWOOD LN.
TOPEKA, KS 66611

6513

May 26 1988

44-16/1011

Pay to the
order of

\$125.00

DOLLARS



MERCHANTS
NATIONAL BANK
TOPEKA, KANSAS

MEMO

⑆101100168⑆ 335 371⑈ 6513

MARVIN OR NORMA ALTMAN
12731 GLENFIELD 913-345-8668
LEAWOOD, KS 66209

370

5/26 1988

18-1/1010

PAY TO THE
ORDER OF

\$125.00/100

DOLLARS



Commerce Bank
of Kansas City
Kansas City, Missouri 64101

INVESTMENT SAVINGS

285

KENNETH FRAHM
P. O. DRAWER F
COLBY, KS 67701

148

83-365/1011

5/20 1988

Pay to the
order of

Republican Party - Golf
One Hundred Twenty Five and 00/100

\$ 125.00

Dollars

FARMERS &
MERCHANTS BANK
COLBY, KANSAS 67701

For Fletcher B. C. Jr.

[Signature]

⑆101103657⑆ 300 118 511 1484

MARVIN OR NORMA ALTMAN
12731 GLENFIELD 913-345-8668
LEAWOOD, KS 66209

364

5/20 1988

18-1/1010

PAY TO THE
ORDER OF

Republican Party Golf

\$ 125.00

One Hundred Twenty Five and 00/100

DOLLARS

 **Commerce Bank** 215
of Kansas City
Kansas City, Missouri 64141

INVESTMENT SAVINGS

285

[Signature: Marven Altman]

MEMO

⑆101000019⑆ 753917210364

W. J. GEORGE
10320 HOWE LANE 383-1991
LEAWOOD, KS 66206

2634

5/20 1988

18-34/1010

PAY TO THE
ORDER OF

Republican Party - Golf

\$ 125.00

One Hundred Twenty Five and 00/100

DOLLARS

 **The Merchants - Metropolitan Bank**
8550 Metcalf • Kansas City, Missouri 64114
Office

11-82

[Signature]

MEMO

⑆101000349⑆ 0400507164 2634

CLINTON C. ACHESON
5859 SW. 22ND ST. TERR. 272-8118
TOPEKA, KS 66614

1704

5-22 1988

44-72/1011

PAY TO THE
ORDER OF

Republican Party - Golf

\$ 125.00

One Hundred Twenty Five and 00/100

DOLLARS

 **Commerce Bank & Trust**
TOPEKA KANSAS

[Signature]

DAVID R. OR JUDITH K. LORITZ
8517 BRADSHAW 888-4921
LENEXA, KS 66215

1563

5-4-88

83-287/1010

PAY TO THE
ORDER OF

Republican party - Golf \$ 125.00
one hundred and twenty five ⁰⁰/₁₀₀ DOLLARS

LENEXA NATIONAL BANK
(913) 888-0700
8700 MONROVIA - LENEXA, KANSAS 66215

MEMO

⑆101003870⑆ 011500052833⑈1563

David R. Lortz

JAMES K. VILLAMARIA
ANN W. VILLAMARIA
PH 913-273-9057
6123 SW 26 CT D
TOPEKA, KS 66614

0860

May 17, 1988

44-7128
3011

Pay to the
Order of

Republican Party - Golf \$ 125.00
One hundred twenty five and ⁰⁰/₁₀₀ Dollars

Capitol Federal Savings
TOPEKA, KS 66607



1-85

For *F. Bell Olsen Golf*

Signed

James K. Villamaria

⑆301171285⑆1066481 9 18⑈0860

C. W. HECKATHORN OR
MARY L. HECKATHORN
PH 913-272-0547
3525 OAK PARKWAY
TOPEKA, KS 66614

1793

May 17, 1988

44-7128
3011

Pay to the
Order of

Republican Party - Golf \$ 125.00
One hundred and twenty-five and ⁰⁰/₁₀₀ Dollars

Capitol Federal Savings
TOPEKA, KS 66607



7-82

For

Signed

C. W. Heckathorn

⑆301171285⑆138866 7 18⑈1793

L. JEREMY SLAUGHTER 1176
3644 SW EVENINGSIDE DR. 913-273-8961
TOPEKA, KS 66614

5369

5/4 88

44-16/1011

PAY TO THE
ORDER OF

Republican Party - Golf \$ 125.00
One hundred twenty five and ⁰⁰/₁₀₀ DOLLARS

Merchants National Bank
TOPEKA, KS 66607

David R. Lortz

CARPENTER, HEIN, CARPENTER & WEIR, CHARTERED

11083

ATTORNEYS-AT-LAW
CLIENT ACCOUNT
5425 S.W. 7TH ST. 913-273-4170
P. O. BOX 4287
TOPEKA, KS 66604

44-06
1011

May 17 1988

PAY
TO THE
ORDER OF

Republican Party - Golf
Five Hundred and no/100

\$ 500.00

DOLLARS

CARPENTER, HEIN, CARPENTER & WEIR, CHARTERED

THE COLUMBIAN NATIONAL BANK
AND TRUST COMPANY
P.O. BOX 2697
TOPEKA, KANSAS 66601

FOR Fundraiser - RRA

Ed R. Hein

⑆101100663⑆

⑈003 905⑈

CHECK NUMBER

477442

 **American Investors Life**

Insurance Company, Inc. 415 Southwest 8th Avenue, P.O. Box 2039, Topeka, Ks. 66601 913 / 232-6945

MO.	DAY	YEAR
05	05	88

*****6250 DOLLARS 00 CENTS

PAY THIS
AMOUNT

DOLLARS
\$625.00

AMERICAN INVESTORS LIFE INSURANCE CO

PAY TO THE ORDER OF

REPUBLICAN GOLF
TOURNAMENT

Don Munn

THE MERCHANTS BANK
KANSAS CITY, MISSOURI

⑈477442⑈ ⑆101000349⑆⑈0100279667⑈



VICTORY LIFE INSURANCE COMPANY
300 S.W. EIGHTH AVENUE - TOPEKA, KANSAS 66603-3984

\$ 073254

BANK IV TOPEKA, N.A.
Topeka, Kansas

REPUBLICAN PARTY FUND
RAISER

5/09/88

****1,000.00*

PAY
TO THE
ORDER
OF

REPUBLICAN PARTY - GOLF

111 CRAIG F. KAMMEN 111
NON NEGOTIABLE AFTER 90 DAYS

⑈00073254⑈ ⑆101000155⑆ ⑈101000155⑈

JOANN WILEY
218 SUMMERTREE 842-7818
LAWRENCE, KS 66044

278

May 9 1988

83-7067/301

Pay to the
order of

Republican Party - Golf \$125⁰⁰
One hundred twenty-five and ⁰⁰/₁₀₀ Dollars

Columbia Savings

801 Vermont/Lawrence, KS 66044

For Donation

JOANN WILEY
⑆30⑆1⑆7067⑆⑆0⑆158008⑆192⑆⑆0278

Check Mounter Bank Note \$7

THOMAS D. OR BARBARA T. HANEY

1447 SW. OAKLEY AVE. 232-4874
TOPEKA, KS 66604

2706

5/12 88

44-72/1011

Republican Party - Golf \$125⁰⁰
One hundred and ⁰⁰/₁₀₀ Dollars



Commerce Bank & Trust
TOPEKA, KANSAS

⑆10⑆1⑆00728⑆⑆62⑆⑆433⑆⑆0⑆2706



GREGORY F. MAHER
PAMELA S. MAHER
5914 SW. 25TH ST. 272-4975
TOPEKA, KS 66614

4801

5-17 88

44-15/1011

REPUBLICAN PARTY - GOLF \$125⁰⁰
One hundred twenty five and ⁰⁰/₁₀₀ - DOLLARS

BANK V TOPEKA, KA
Topeka Kansas

MEMO

⑆10⑆1⑆00155⑆⑆4801⑆⑆87⑆⑆963⑆⑆0⑆

SCHOOLCRAFT FARMS, LTD
E. BLAINE SCHOOLCRAFT

P. O. BOX 5 913 733-2207
WAVERLY, KS 66871

1879

5-9 1988

83-443/1011

Pay to
the order of

Republican Party - Golf \$125⁰⁰
One hundred twenty five and ⁰⁰/₁₀₀ Dollars



FIRST NATIONAL BANK
WAVERLY, KANSAS 66871

Blaine Schoolcraft

E. Blaine Schoolcraft

COL (RET.) JOHN F. ORNDORFF
ALISON S. ORNDORFF

4125

SS 400-84-1944

10 May 1988

83-11/1011

R. R. 2, BOX 90-R

LEAVENWORTH, KS 66048

Pay to the
order of

Republican Party - Golf

\$ 125.00

Dollars



EXCHANGE BANK
THE EXCHANGE NATIONAL BANK AND TRUST COMPANY
ATCHISON, KANSAS 66002

For

John F. Orndorff

⑆101100113⑆4125 75 425 01⑈

Rocky Mountain Bank Note

Letter Size

COL ORVILLE N. BUTTS 540-38-8910
8 REYNOLDS AVE. 913-682-9853
FT. LEAVENWORTH, KS 66027

322

4 May 1988

83-831/1011

PAY TO THE
ORDER OF

Republican Party - Golf

\$ 125.00

DOLLARS

ARMY
NATIONAL
BANK



PH: 800-255-6583
PH: 913-682-8090
3RD & KANSAS
FT. LEAVENWORTH, KS 66027

MEMO

Donation

Orville N. Butts

⑆101108319⑆ 427373⑈ 0322

COLONEL THOMAS R. GORDON 093-32-3969
US ARMY PH. 684-2960
SECRETARY COMMAND & GENERAL STAFF COLLEGE
FT. LEAVENWORTH, KS 66027-6900

4926

May 6, 1988

86-1267/1031

PAY TO THE
ORDER OF

Republican Party - Golf

\$ 125.00

DOLLARS



Fort Sill National Bank
P.O. Box 33009 Ph. 405-357-9660
Fort Sill, Oklahoma 73503

MEMO

Thomas R. Gordon

⑆103112675⑆ 4926 186982⑈



MARY LOU HAMILTON
BELA S. HAMILTON
1302 JACKSON CT. 913 682-5879
LEAVENWORTH, KS 66048

3488

May 10 1988

83-1/1011

Pay to the
order of

Republican Party - Golf

\$ 125.00

Dollars

One hundred twenty five

and

00/100



First National
Bank & Trust Company
of Leavenworth member FDIC
2nd & Leavenworth Leavenworth, KS 66048

The "First Flight" Club

Bela S. Hamilton

HOLBROOK, ELLIS & HEAVEN, P.A.

ATTORNEYS-AT-LAW
757 ARMSTRONG
P. O. BOX 1927
KANSAS CITY, KS 66117

MISSION HILLS BANK NA
MISSION HILLS, KS 66205
83-403/1010

DATE	CHECK	AMOUNT
05/23/88	22706	125.00

*** ONE HUNDRED TWENTY FIVE & 00/100 DOLLARS

PAY
TO THE
ORDER
OF: Republican Party - Golf
Fletcher Bell
P. O. Box 924
Lawrence, KS 66044

Glady's Kennedy

⑆10100403⑆ 00156 2⑈

KGE . PAC

P. O. BOX 208 316-261-6220
WICHITA, KS 67201

365

5-5 19 88 40-2
1011

PAY TO THE ORDER OF The Kansas Republican Party \$ 125.00
One hundred twenty five and 00/100 DOLLARS

FIRST NATIONAL BANK

First National Bank in Wichita
Wichita, Kansas 67201

FOR Political Contribution

[Signature]

⑈000365⑈ ⑆10100029⑆ 045333 ⑆⑈



**THOMAS E. SLATTERY
MARY ELLEN SLATTERY**

3431 N.W. 42ND 286-0520
TOPEKA, KANSAS 66618

1580

5-6- 19 88 44-88
1011

Pay to the order of Republican Party Golf \$ 125.00
One Hundred Twenty Five and 00/100 DOLLARS

**THE COLUMBIAN NATIONAL BANK
AND TRUST COMPANY**

P.O. BOX 2697
TOPEKA, KANSAS 66601

Thomas E. Slattery

FOR

⑆10100663⑆

⑈102 245⑈

DEREK J. SHAFER

ATTORNEY-AT-LAW

913-232-1444

512 FIRST NATIONAL BANK TOWER

TOPEKA, KS 66603

2844

PAY
TO THE
ORDER OF

Republican Party - Golf

5-9 1988

44-16
1011

\$ 125.00

One Hundred and twenty five and no/100

DOLLARS

1st First
National
Bank

ONE TOWNSITE PLAZA - TOPEKA, KS 66608

FOR *FB open*

Derek J. Shafer

⑈002844⑈ ⑆101100155⑆

⑈1200465006⑈

STEVEN L. FOULSTON

BUS : 267-1966 HOME : 685-7084

1620 KANSAS STATE BANK & TRUST

125 N. MARKET

WICHITA, KS 67202

1585

PAY
TO THE
ORDER OF

REPUBLICAN PARTY - GOLF

5-6 1988

83-1021
1011

\$ 125.00

One Hundred and Twenty Five and no/100

DOLLARS

THE ROSE HILL STATE BANK

ROSE HILL, KANSAS 67133

FOR

Steven L. Foulston

⑈001585⑈ ⑆101110213⑆ 28 647 8⑈06

GOODELL, STRATTON,
EDMONDS & PALMER

Attorneys at Law

215 E. 8th St.

Topeka, Kansas 66603

913/233-0593

No. 15831

44-16
1011

Date May 16, 1988

PAY TO THE
ORDER OF

Republican Party- Golf

\$ 125.00

I 25 DOLLARS 00 CTS

DOLLARS

Merchants National Bank
of
Topeka, Kansas

GOODELL, STRATTON,
EDMONDS & PALMER

By

Steven L. Foulston

⑆101100168⑆

⑈047 171⑈

KANSAS BANKERS ASSOCIATION BANKPAC 1177
STATE
1500 MERCHANTS NATIONAL BANK BLDG.
TOPEKA, KS 66612

819

PAY
TO THE
ORDER OF

Republican Party - Golf

May 6

1988

44-16
1011

\$ *125.00*

One hundred twenty-five and 00/100

DOLLARS



Merchants
National Bank
Topeka, Kansas 66612

FOR

fundraiser

Linda J. Mc Coursey

⑈000819⑈ ⑆101100168⑆

⑈060 275⑈

PETE MCGILL & ASSOCIATES, INC.
400 W. 8TH ST., SUITE 412 913-233-4512
TOPEKA, KS 66603

1569

44-55/1011

PAY
TO THE
ORDER OF

Republican Party - Golf

May 9

1988

\$125.00

One Hundred Twenty-Five and no/100

DOLLARS

TOPEKA BANK
AND TRUST COMPANY
Seventh & Kansas Avenue, Topeka, KS 66601

[Signature]

FOR

⑈001569⑈ ⑆101100553⑆

⑈051 543⑈

SLOAN, LISTROM, EISENBARTH, SLOAN & GLASSMAN
714 CAPITOL FEDERAL BUILDING 357-6311
TOPEKA, KANSAS 66603-3881

60954

CHECK NO.

44-67
1011

60954

ONE HUNDRED TWENTY FIVE----DOLLARS AND 00/100

PAY TO THE ORDER OF

REPUBLICAN PARTY GOLF
LAWRENCE KS

DATE

AMOUNT

5/17/88

\$125.00

THE FIDELITY BANKS
TOPEKA KANSAS 66603

⑈060954⑈ ⑆101100676⑆

⑈01 246⑈

[Signature]

KANSAS INS. SERV. SYSTEMS, INC.
316-223-5252
SUITE 205, CITIZENS BANK PLAZA
FORT SCOTT, KS 66701

 **The Citizens
National Bank**
(316) 223-1260 200 E. MAIN FORT SCOTT, KS 66701

864

PAY
TO THE
ORDER OF

Republican Party - Golf
Thirty-five & no/100

5-11 1988 83-56
1011

\$ *35.00*

DOLLARS

THIS CHECK IS DELIVERED FOR PAYMENT ON THE ACCOUNTS LISTED

Patricia Cowan

⑈000864⑈ ⑆101100566⑆ ⑈0024015⑈



Manhattan Mutual
LIFE INSURANCE COMPANY

EIGHTH AND POYNTER
MANHATTAN, KANSAS 66502

May 13, 1988

85699
\$ 70.00

The sum of 70 dollars 00/100

UNION NATIONAL BANK
MANHATTAN, KANSAS 66502

PAY

TO THE
ORDER
OF

Republican Party - Golf

Don S. (Cowan)
AUTHORIZED SIGNATURE

AUTHORIZED SIGNATURE

⑈085699⑈ ⑆101101251⑆ ⑈010412⑈

HARWOOD'S, INC. 670

3103 IOWA 843-2311
LAWRENCE, KS 66044

32019

83-1464 1011

PAY
TO THE
ORDER OF

Republican Party -

5-17 1988 \$ 70.00

Seventy and no/100

DOLLARS



Douglas County Bank
Lawrence, Kansas 66044

Winston B. Harwood

FOR

⑈032019⑈ ⑆101114646⑆

02383 3⑈

JONELL WILLIAMS 1062
700 CALIFORNIA ST. 843-4515
LAWRENCE, KS 66044

2016

5-6 1988

83-1484/1011

Pay to the order of Republican Party - Golf \$ 35.00
Thirty-five and no/100 DOLLARS



Douglas County Bank
Lawrence, Kansas 66044

Jonell Williams

⑆101114646⑆ 2016 28167 0⑈

PAUL D. TOMPKINS 985
BUILDING ACCOUNT
P. O. BOX 4266
TOPEKA, KS 66604

1769

5-5 1988

44-55/1011

PAY TO THE ORDER OF Fletcher Bell Open \$ 35.00
Thirty five and no/100 DOLLARS



TOPEKA BANK
and TRUST COMPANY
P.O. BOX 56 TOPEKA KANSAS 66601

Paul D Tompkins

MEMO

⑆101100553⑆ ⑈030 34⑈ 1769

STEPHEN J. WANAMAKER 273
MARY L. WANAMAKER
2306 BROOKFIELD 913-273-1139
TOPEKA, KS 66614

1286

May 6 1988

44-16/1011

PAY TO THE ORDER OF Republican Party - Golf \$ 35.00
Thirty-five and no/100 DOLLARS



Merchants
National Bank

Stephen J Wanamaker

MEMO

⑆101100168⑆ 436 895⑈ 1286

JOHN C. WHITAKER, P.A.
ATTORNEY-AT-LAW
7940 PARALLEL
KANSAS CITY, KS 66109

1409

18-104/1010

5/6 1988

PAY TO THE ORDER OF Republican Party \$ 35.00
Thirty five and no/100 DOLLARS



BROTHERHOOD BANK & TRUST
756 Minnesota Avenue, Kansas City, Ka. 66101

John C Whitaker

DANIEL R. OR PATRICIA C. JAIMES 366
1905 CAMELBACK DR. 842-3748
LAWRENCE, KS 66046

7719

May 22 1988

83-1464/1011

Republican Party - Golf

\$35.00

PAY TO THE ORDER OF

Thirty five and no hundredths

DOLLARS



Douglas County Bank
Lawrence, Kansas 66044

Daniel R. Jaimes

⑆101114646⑆ 7719 17214 6⑈

THOMAS M. GREGG 1258

LIC. N1J0R2

3401 HARRISON 913-266-6510
TOPEKA, KS 66611

4285

May 12 1988

44-67/1011

PAY TO THE
ORDER OF

Republican Party - Golf

\$**35.00**

*Thirty-five dollars and no cents*****DOLLARS



The Fidelity Banks

Topeka, Kansas 66603
Fidelity State Bank & Trust Co. - Member FDIC

MEMO

Joe Munger

⑆101100676⑆ 4285 ⑈10 509 0⑈

R. E. OR BARBARA E. CREWS

3100 BROADWAY 816-561-4140
PENN TOWER OFFICE CENTER
KANSAS CITY, MO 64111

1191

5-11 1988

83-1463/1010

PAY TO THE
ORDER OF

Republican Party - Golf

\$35.00

Thirty-five and no/100

DOLLARS



MidAmerican Bank

and Trust Company (913) 384-3450
406 AVENUE AT 50TH TERRACE P.O. BOX 2947
SHAWNEE MISSION KANSAS 66201-1347 MEMBER FDIC

MEMO

RE CREWS

⑆101014636⑆ 1191 25597 ⑈

RUCKER FOR COMMISSIONER
DUANE E. NIGHTINGALE, TREASURER

3701 SE LONG PH 913-266-7887
TOPEKA, KS 66609

127

5-5 1988

44-7128
3011

Pay to the
Order of

REPUBLICAN PARTY - GOLF

\$35.00

THIRTY FIVE and 00/100

Dollars

Capitol Federal
Savings



JAMES D. WICKENDEN 776
ESTHER K. WICKENDEN
842-4584
2706 PRINCETON
LAWRENCE, KANSAS 66044

2391

83-42/1011

PAY TO THE
ORDER OF

Republican Party - Golf \$ *35.00*
Thirty five and 00/100 DOLLARS

THE FIRST NATIONAL BANK OF LAWRENCE

(913) 843-0152 • Ninth & Massachusetts
Lawrence, Kansas 66044-0428

MEMO

James D. Wickenden
⑆101100427⑆ 7248958⑆ 2391

G. BARNEY BYARD, C.L.U.
BUSINESS AND PERSONAL INSURANCE PLANNING
ONE TOWNSITE PLAZA, SUITE 1300 354-7691
TOPEKA, KANSAS 66603

1922

44-15/1011

5-31 19 88

PAY
TO THE
ORDER OF

Republican Party-Golf

\$ 35.00

Thirty-five and no cents-----DOLLARS

BANK IV TOPEKA, KA.
Topeka, Kansas

FOR

⑆001922⑆ ⑆101100155⑆ ⑆43⑆274⑆1⑆

G. Barney Byard

DALLAS K. MURPHY

LIC. 13M2U3

3304 RIVERVIEW RD. 913-842-2142
LAWRENCE, KS 66044-4832

3072

83-249
1011

*Pay to the
Order of*

Republican Party - Golf \$ *35.00*
THIRTY FIVE AND NO/100

CITIZENS
STATE
BANK

TRUST CO. OF KANSAS 67439

MEMO

⑆101102496⑆ 43⑆541⑆4⑆ 3072

Dallas K. Murphy

RONALD J. SCHEFFLER

2207 KENILWORTH CT. 357-0648
TOPEKA, KS 66606

3687

6-2 19 88

44-72/1011

PAY TO THE
ORDER OF

REPUBLICAN PARTY - GOLF \$ 35.00
THIRTY FIVE AND NO/ DOLLARS



Commerce Bank & Trust
TOPEKA, KANSAS

★ *Ronald J. Scheffler*



MEMBER FDIC

Main Bank: 95th Iowa Street
Terrace Bank: 26th and Iowa Street
Lawrence, Kansas 66044
(913) 843-4700

FIRSTBANK'S MONEY MARKET ACCOUNT GIVES YOU
MARKET-RATE INTEREST, SIX FREE WITHDRAWALS
PER MONTH & FDIC INSURANCE TO \$100,000.00

PO BOX REPUBLICAN CENTER COMM
C/O JUSTIN HILL JR
2801 LAKEVIEW RD
LAWRENCE KS 66044

ACCOUNT NUMBER
309362
STATEMENT DATE
6/07/88
PAGE NO.
1

TAX ID NUMBER 000-00-0000 PLEASE VERIFY FOR ACCURACY

STATEMENT SUMMARY FOR REGULAR CHECKING

PREVIOUS STATEMENT BALANCE	127.52	AS OF 5/06/88
+ CREDITS TOTALING	13,415.00	
- DEBITS TOTALING	69.73	
SERVICE CHARGE AMOUNT	.00	

CURRENT STATEMENT BALANCE	13,472.77	
AVERAGE CYCLE BALANCE	939.40	
AVERAGE COLLECTED BALANCE	509.96	
NUMBER OF ENCLOSURES	2	

DEPOSITS AND OTHER CREDITS.....

DATE	AMOUNT	DESCRIPTION
6/06	13,415.00	DEPOSIT

CHECKS.....

DATE	CHECK NO.	AMOUNT	DATE	CHECK NO.	AMOUNT
6/27		69.73			

DAILY BALANCE SUMMARY.....

DATE	BALANCE	DATE	BALANCE	DATE	BALANCE
7/7	67.57	6/26	13,472.77		

EXHIBIT C

OGC 6148

Douglas County Republican Central Committee

50 MAY -7 PM 1:01

Chris Miller, Chairman
Sandy Praeger, Vice-Chairman
Grace Marion, Secretary
Philip Bradley, Treasurer

May 2, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 MAY -8 AM 11:36

Ms. Fran Hagan
Federal Election Commission
Washington, D.C. 20463

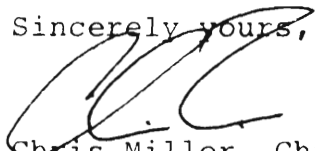
Re: MUR 3014
Douglas County Republican Central Committee
Chris Miller, as Treasurer

Dear Ms. Hagan:

In reviewing my file, regarding this matter, I note that I forwarded our interrogatory answers to you, by letter of January 18, 1990. At the time, you indicated that you needed them quite soon, so that a decision could be reached in this matter.

Please advise when we might expect the decision of your agency. Thank you for your assistance.

Sincerely yours,



Chris Miller, Chairman
Douglas County Republican
Central Committee

CM/af

cc: Ms. Anita Heiman
Mr. Douglas Martin

90 MAY 15 PM 4:19

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	MUR 3014
Second District Republican	)	
Committee	)	
Anita Heiman, as treasurer	)	
Douglas County Republican	)	
Central Committee	)	
Chris Miller, as treasurer	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On November 28, 1989, the Commission found reason to believe that the Second District Republican Committee ("Second District Committee") and Anita Heiman, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv) by receiving prohibited funds transferred from the unregistered Douglas County Republican Central committee ("Douglas County committee"). The Commission also found reason to believe that the Douglas County committee and Chris Miller, as treasurer, violated 2 U.S.C. §§ 441b(a), 433 and 434, and 11 C.F.R. § 102.6(a)(1)(iv) by making a transfer including prohibited funds to the Second District Committee; at the same time triggering the threshold for registration and reporting as a political committee. The committees have requested pre-probable cause conciliation to resolve these issues.

II. ANALYSIS

In answers to interrogatories, the Second District Committee explained its relationship with the Douglas County committee as follows:

The Second District Committee is composed of all counties within their region. They each have a local committee or party organization and those groups are what comprise the second district...They meet individually, support local candidates, but attend our district meetings. Ou[r] District Officers...are chosen from all committees when we hold district meetings. It unites the party in regard to state and National issues, events and candidates.

9304030231
Respondents described the fundraising event that provided the funds in the transfer from the Douglas County committee to the 2nd District Committee. According to Douglas County, "The funds were derived almost solely from one fundraising event, the Fletcher Bell golf Tournament, sponsored by the Honorable Fletcher Bell, Kansas Commissioner of Insurance, on behalf of the local Republican Party Committees." According to respondents, the event was somewhat informally organized solely by the Douglas County committee. Apparently, donations to the golf outing were deposited into an account held by the Douglas County committee, expenses were paid from that account, and half the net proceeds were disbursed to the Second District Committee.

The Douglas County committee provided a copy of its financial ledger accounting for receipts and disbursements related to the event, and supported this document with copies of contributor checks. Contributors to the event included both individuals and corporations. By applying the last-in-first-out method of review, the Office of the General Counsel was able to ascertain the source of available monies at the time of the transfer to the registered Second District Committee Committee. Based on our review, \$1,425 in prohibited funds were transferred into the Second District Committee's account in violation of

2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).¹

In addition, the Douglas County committee attained political committee status through its transfer in excess of \$1,000 to the registered Second District Committee. See 2 U.S.C. § 431(4)(C); 11 C.F.R. § 102.6(a)(2).

III. DISCUSSION OF CONCILIATION PROVISIONS AND CIVIL PENALTY

93040802372

III. RECOMMENDATIONS

1. Enter into conciliation with the following prior to a finding of probable cause to believe:
 - a) Second District Republican Committee and Anita Heiman, as treasurer;
 - b) Douglas County Republican Central Committee and Chris Miller, as treasurer.
2. Approve the attached letters and proposed conciliation agreements.

Lawrence M. Noble
General Counsel

May 15, 1990
Date

BY:

Lois G. Lerner
Associate General Counsel

Attachments

- A. Requests for Conciliation
- B. Proposed Conciliation Agreements and Letters (2 each)

Staff Assigned: Frances B. Hagan

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Second District Republican Committee
Anita Heiman, as treasurer
Douglas County Republican Central
Committee
Chris Miller, as treasurer

)
) MUR 3014
)
)
)
)
)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session on June 12,
1990, do hereby certify that the Commission decided by a
vote of 4-0 to take the following actions in MUR 3014:

1. Enter into conciliation with the Second
District Republican Committee and Anita
Heiman, as treasurer, and Douglas County
Republican Central Committee and Chris
Miller, as treasurer, prior to a finding
of probable cause to believe.
2. Approve the letters and proposed conciliation
agreements attached to the General Counsel's
report dated May 15, 1990.

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

Attest:

June 12, 1990
Date

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



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

June 14, 1990

Anita Heiman, Treasurer
Second District Republican Committee
Rte. 3, Box 147
Seneca, Kansas 66538

RE: MUR 3014
Second District Republican Committee
Anita Heiman, as treasurer

Dear Ms. Heiman:

On November 28, 1989, the Federal Election Commission found reason to believe that the Second District Republican Committee and you, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv). At your request, on June 12, 1990, 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 you and your Committee 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 Frances S. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner
by [signature]

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

June 14, 1990

Chris Miller, Treasurer
Douglas County Republican
Central Committee
1505 Kasold
Lawrence, Kansas 66046

RE: MUR 3014
Douglas County Republican
Central Committee
Chris Miller, as treasurer

Dear Mr. Miller:

On November 28, 1989, the Federal Election Commission found reason to believe that the Douglas County Republican Central Committee and you, as treasurer, violated 2 U.S.C. §§ 433, 434, and 441b(a), and 11 C.F.R. § 102.6(a)(1)(iv). At your request, on June 12, 1990, 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 you and your Committee 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 Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

20040802378



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 28, 1990

Anita Heiman, Treasurer
Second District Republican Committee
Route 3, Box 147
Seneca, Kansas 66538

RE: MUR 3014
Second District Republican
Committee
Anita Heiman, as treasurer

Dear Ms. Heiman:

The enclosed conciliation agreement in the above-referenced matter has been retyped for signature. Upon receipt of the signed agreement, the Office of the General Counsel will present the proposal to the Commission for its consideration.

If you have any questions, please call Frances B. Hagan, the staff person assigned to this matter, at (202) 376-8200.

Sincerely,

A handwritten signature in black ink, appearing to read "Lois G. Lerner", is written over a horizontal line.

Lois G. Lerner
Associate General Counsel

Enclosure

90040802377

RECEIVED
FEDERAL ELECTION COMMISSION

OGC 7834

90 JUL 21 AM 10:23

July 10, 1990

Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington D.C. 20463

Re: MUR 3014
Second District Republican Committee
Anita Heiman, as treasurer

Dear Ms. Lerner,

The enclosed conciliation agreement on the above-referenced matter has been signed, the check enclosed and submitted to you for consideration.

Please contact me if you require any further information or action on this matter. Thank you for your assistance.

Sincerely,



Anita Heiman
Treasurer, Second District
Route 3 Box 147
Seneca, KS 66538

90 JUL 24 AM 11:45

FEDERAL ELECTION COMMISSION

93040802378



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 9, 1990

Chris Miller, Treasurer
Douglas County Republican
Central Committee
P.O. Box 1511
Lawrence, Kansas 66044

RE: MUR 3014
Douglas County Republican
Central Committee
Chris Miller, as treasurer

Dear Mr. Miller:

The enclosed conciliation agreement in the above-referenced matter has been retyped for signature. Upon receipt of the signed agreement, the Office of the General Counsel will present the proposal to the Commission for its consideration.

If you have any questions, please call Frances B. Hagan, the staff person assigned to this matter, at (202) 376-8200.

Sincerely,


Lois G. Lerner
Associate General Counsel

Enclosure

20040802379

06C 7506

Douglas County Republican Central Committee

90 AUG 20 PM 1:55

Chris Miller, Chairman
Sandy Praeger, Vice-Chairman
Grace Marion, Secretary
Philip Bradles, Treasurer

August 13, 1990

CERTIFIED MAIL

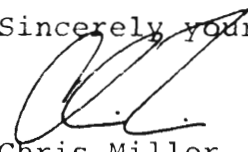
Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 3014
Douglas County Republican Central Committee
Chris Miller, as Treasurer

Dear Ms. Lerner:

Please find enclosed your signed Conciliation Agreement.

Sincerely yours,


Chris Miller, Chairman
Douglas County Republican
Central Committee

CM/af
Enclosure

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:01

90 SEP -4 PM 3:48

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of	)	
	)	MUR 3014
Second District Republican	)	
Committee	)	
Anita Heiman, as treasurer	)	
Douglas County Republican	)	
Central Committee	)	
Chris Miller, as treasurer	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached are two conciliation agreements, one signed by Anita Heiman, treasurer of Second District Republican Committee, and the other signed by Chris Miller, treasurer of Douglas County Republican Central Committee.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreements with the following:
 - a) Second District Republican Committee and Anita Heiman, as treasurer;
 - b) Douglas County Republican Central Committee and Chris Miller, as treasurer.

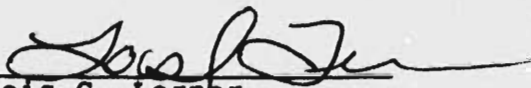
90040802381

2. Close the file.
3. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

Date 9/4/90

BY:


Lois G. Lerner
Associate General Counsel

Attachments

- A. Conciliation Agreements
- B. Photocopy of civil penalty check from Second District

Staff Assigned: Frances B. Hagan

90040302382

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Second District Republican Committee;) MUR 3014
Anita Heiman, as treasurer; Douglas)
County Republican Central Committee;)
Chris Miller, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 19, 1990, the Commission decided by a vote of 6-0 to take the following actions in MUR 3014:

1. Accept the conciliation agreements with the following:
 - a) Second District Republican Committee and Anita Heiman, as treasurer;
 - b) Douglas County Republican Central Committee and Chris Miller, as treasurer.
2. Close the file.
3. Approve the appropriate letters, as recommended in the General Counsel's Report dated September 4, 1990.

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

Attest:

9-19-90
Date

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

Received in the Secretariat:	Tuesday, Sept. 4, 1990	3:48
Circulated to the Commission:	Wednesday, Sept. 5, 1990	11:00
Deadline for vote:	Thursday, Sept. 20, 1990	4:00

ha

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

September 24, 1990

Anita Heiman, Treasurer
Second District Republican Committee
Route 3, Box 147
Seneca, Kansas 66538

RE: MUR 3014
Second District Republican
Committee
Anita Heiman, as treasurer

Dear Ms. Heiman:

On September 19, 1990, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on behalf of the Second District Republican Committee and you, as treasurer, in settlement of a violation of 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 102.6(a)(1)(iv) of the Commission's Regulations. Accordingly, the file has been closed in this matter.

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

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

90040802384

Anita Heiman, Treasurer
Page 2

questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel

Lois G. Lerner JB

BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

90040802385

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3014
Second District Republican Committee)
Anita Heiman, 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 the Second District Republican Committee and Anita Heiman, as treasurer, ("Respondents") violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).

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. The Second District Republican Committee is a

political committee within the meaning of 2 U.S.C. § 431(4).

2. Anita Heiman is treasurer of the respondent committee.

3. 11 C.F.R. § 102.6(a)(1)(ii) states that transfers of funds may be made without limit on amount between or among a national party committee, a State party committee and/or any subordinate party committee whether or not they are political committees and whether or not such committees are affiliated. Section 102.6(a)(1)(iv) states that these transfers shall be made only from funds which are permissible under the Act.

4. 2 U.S.C. § 441b(a) prohibits the making or knowing receipt of corporate or labor organization funds in connection with a federal election.

5. Kansas law allows the use of corporate and labor union monies in connection with state elections.

6. On July 5, 1988, Respondents deposited a transfer of \$6,223.12 from the unregistered Douglas County [Kansas] Republican Central committee ("Douglas County committee"). The transfer represented partial proceeds from a fundraising event held by the Douglas County committee. Contributors to the fundraiser included individuals and corporations. As a result of the transfer, funds impermissible under the Federal Election Campaign Act of 1971, as amended, totaling \$1,425.00 were deposited into the Respondents' bank account.

V. Respondents accepted prohibited contributions in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).

VI. Respondents will pay a civil penalty to the Federal

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Election Commission in the amount of five hundred dollars (\$500.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents will refund to the Douglas County Republican Central committee the amount of the prohibited funds (\$1,425).

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

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

X. Respondents shall have no more than 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
Lois G. Lerner
Associate General Counsel

September 24, 1990
Date

FOR THE RESPONDENTS:

Anita Heiman
(Name) Anita Heiman
(Position) Treasurer

July 10, 1990
Date

90040502389



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

September 24, 1990

Chris Miller, Treasurer
Douglas County Republican
Central Committee
P.O. Box 1511
Lawrence, Kansas 66044

RE: MUR 3014
Douglas County Republican
Central Committee
Chris Miller, as treasurer

Dear Mr. Miller:

On September 19, 1990, the Federal Election Commission accepted the signed conciliation agreement submitted on behalf of the Douglas County Republican Central Committee and you, as treasurer, in settlement of violations of 2 U.S.C. §§ 433, 434, and 441b(a), provisions of the Federal Election Campaign Act of 1971, as amended, and 11 C.F.R. § 102.6(a)(1)(iv) of the Commission's Regulations. Accordingly, the file has been closed in this matter.

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

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

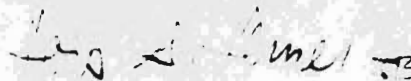
90040802390

Chris Miller, Treasurer
Page 2

questions, please contact Frances B. Hagan, the staff member
assigned to this matter, at (202) 376-8200.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Conciliation Agreement

90040802391

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3014
Douglas County Republican Central)
committee)
Chris Miller, 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 the Douglas County Republican Central committee and Chris Miller, as treasurer, ("Respondents") violated 2 U.S.C. §§ 433, 434, and 441b(a), and 11 C.F.R. § 102.6(a)(1)(iv).

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. The Douglas County Republican Central committee is

an unregistered county party committee in Kansas.

2. Chris Miller is treasurer of the respondent committee.

3. 11 C.F.R. § 102.6(a)(1)(ii) states that transfers of funds may be made without limit on amount between or among a national party committee, a State party committee and/or any subordinate party committee whether or not they are political committees and whether or not such committees are affiliated. Section 102.6(a)(1)(iv) states that these transfers shall be made only from funds which are permissible under the Act. Such transfers are applicable to the threshold for registration and reporting as a political committee under 2 U.S.C. §§ 433 and 434.

4. 2 U.S.C. § 441b(a) prohibits the making or knowing receipt of corporate or labor organization funds in connection with a federal election.

6. Kansas law allows the use of corporate and labor union monies in connection with state elections.

7. On July 5, 1988, Respondents transferred \$6,223.12 to the Second District [Kansas] Republican Committee, a political committee registered with the Commission. The transfer represented partial proceeds from a fundraising event held by the Respondent committee. Contributors to the fundraiser included individuals and corporations. As a result, funds impermissible under the Federal Election Campaign Act of 1971, as amended, were transferred to a federal committee.

8. 2 U.S.C. §§ 433 and 434 require that political committees register and file reports of receipts and

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disbursements with the Commission.

9. 2 U.S.C. § 431(4) defines a political committee as a committee which receives contributions or makes expenditures in excess of \$1,000 within a calendar year. See 2 U.S.C. §§ 431(8)(A) and (9)(A).

10. Respondents attained political committee status through the transfer in excess of \$1,000 to the registered Second District Republican Committee. See 2 U.S.C. § 431(4)(C); 11 C.F.R. § 102.6(a)(2).

V. Respondents made prohibited contributions totaling \$1,425.00 in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.6(a)(1)(iv).

VI. Respondents failed to register and report as a political committee in violation of 2 U.S.C. §§ 433 and 434.

VII. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand dollars (\$1,000.00), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

1. One initial payment of \$334.00, due within 30 days of the effective date of this agreement;

2. Thereafter, beginning 30 days after the initial payment, two consecutive monthly installment payments of \$333.00 each.

3. In the event that any installment payment is not received by the Commission by the fifth day after the 30 day period in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the

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entire amount to become due upon ten days written notice to the respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

VIII. Respondents will register as a political committee and report to the Commission.

IX. 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.

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

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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

Lois G. Lerner
Associate General Counsel

September 24, 1990
Date

FOR THE RESPONDENTS:

Chris Miller

(Name) Chris Miller
(Position) Chairman, Douglas
County Republican Central Committee

Aug. 12, 1990
Date

90040802396



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3014

DATE FILMED 10/12/90 CAMERA NO. 2

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20461

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 3014.

10/28/91

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06C 2845

LAW OFFICES OF
SCHLEICHER, LATZ, LOYD, PATTERSON & LACY
A PROFESSIONAL CORPORATION

CHARLES P. SCHLEICHER**
ROBERT C. LATZ
ROBERT W. LOYD*
DOUGLAS J. PATTERSON
WILLIAM S. LACY, JR.
SCOTT E. MORGAN*
MARK A. FIRESTONE
ERIC C. PEDEN**
STEVEN J. SCHLEICHER**
MICHELLE HURSH

418 PLAZA CENTER BUILDING
800 WEST 47TH STREET
KANSAS CITY, MISSOURI 64112-1246
TELEPHONE (816) 756-0800

KANSAS OFFICE
9908 WENONGA
LEWIS, KANSAS

PLEASE REPLY TO MISSOURI OFFICE

TELECOM 1-800-818-8188

*ADMITTED IN KANSAS
**ADMITTED IN KANSAS AND MISSOURI
ALL OTHERS ADMITTED IN MISSOURI

September 10, 1991

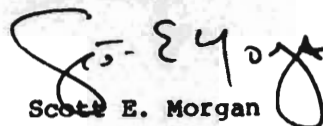
Chairman John W. McGarry
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Mr. Chairman:

I am writing in regard to MUR 3014 and the Douglas County Republican Central Committee. Our records indicate that our Chairman, Chris Miller (previously Treasurer) signed a Conciliation Agreement in this matter on August 12, 1990. However, we have no record of having received a copy signed by the Commission. Accordingly, we believe we have yet to make payment due under the terms of the Conciliation Agreement.

Please clarify this matter so we can be sure there are no loose ends hanging about. Thank you for your attention to this matter.

Sincerely,


Scott E. Morgan

SEM/hjp

91 SEP 20 PM 12:00

RECEIVED
FEDERAL ELECTION COMMISSION

91040374761



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3014 .

12/2/91

91740882259



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 21, 1991

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Chris Miller, Treasurer
Douglas County Republican
Central Committee
P.O. Box 1511
Lawrence, Kansas 66044

RE: MUR 3014
Douglas County Republican Central
Committee and Chris Miller, as treasurer

Dear Mr. Miller:

On September 19, 1990, the Federal Election Commission and the Douglas County Republican Central Committee ("Committee") and you, as treasurer, entered into a conciliation agreement in settlement of violations of 2 U.S.C. §§ 433, 434, and 441b(a), and 11 C.F.R. 102.6(a)(1)(iv). According to the agreement, you were required to pay a civil penalty of \$1,000. The conciliation agreement provided for installment payments, with your first payment due within 30 days of the effective date of the agreement, September 24, 1990, and two additional payments due within 30 days of each previous payment.

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

If you believe the Commission's records are in error, or if you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

91040882260



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3014.

12/13/91

91040882295

COMMITTEE TO ELECT MEL REYNOLDS 06-91
525 E. 103RD
CHICAGO, IL 60628

1180

2-422/710

PAY
TO THE
ORDER OF

Federal Election Commission

November 19 1991

\$ *1,500* ⁰⁰/₁₀₀

One Thousand Five Hundred dollars and no cents DOLLARS



South Shore Bank
Chicago, Illinois 60649

FOR

Marisol Concepcion

⑈001180⑈ ⑆071004226⑆ ⑈900 525 1⑈

06C 3659

RECEIVED
FEDERAL ELECTION COMMISSION

Douglas County Republican Central Committee

91 DEC -9 PM 12:37

Chris Miller, Chairman
Sandy Praeger, Vice-Chairman
Grace Marion, Secretary
Philip Bradles, Treasurer

CLOSED

December 3, 1991

91 DEC -9 AM 3:11

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
WASHINGTON, D.C. 20543

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Lois G. Learner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Learner:

I have received, and thank you for your letter of November 21. I am enclosing a photocopy of that letter, showing that it was received in my office, on December 2.

I note, from your letter, that you indicate our agreement was effective September 24, 1990. Unfortunately, I never received a copy of that agreement from you, or from your office. Consequently, I did not know, until I received your letter of November 21, that the agreement had even been approved, let alone filed.

I will ask our new Treasurer to issue payment, in accordance with the agreement. Thank you for your assistance.

Sincerely yours,



Chris Miller, Chairman
Douglas County Republican
Central Committee

CM/af

Enclosure

cc: Mr. Richard Todd, w/enc.
Mr. Scott Morgan

9104882297



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RECEIVED DEC - 2 1991

November 21, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Chris Miller, Treasurer
Douglas County Republican
Central Committee
P.O. Box 1511
Lawrence, Kansas 66044

RE: MUR 3014
Douglas County Republican Central
Committee and Chris Miller, as treasurer

Dear Mr. Miller:

On September 19, 1990, the Federal Election Commission and the Douglas County Republican Central Committee ("Committee") and you, as treasurer, entered into a conciliation agreement in settlement of violations of 2 U.S.C. §§ 433, 434, and 441b(a), and 11 C.F.R. 102.6(a)(1)(iv). According to the agreement, you were required to pay a civil penalty of \$1,000. The conciliation agreement provided for installment payments, with your first payment due within 30 days of the effective date of the agreement, September 24, 1990, and two additional payments due within 30 days of each previous payment.

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

If you believe the Commission's records are in error, or if you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3014.

12/17/91

91040884047

06 C 3278

Douglas County Republican Central Committee

Chris Miller, Chairman
Sandy Praeger, Vice-Chairman
Grace Marion, Secretary
Philip Bradley, Treasurer

RECEIVED
FEDERAL ELECTION COMMISSION
91 DEC 13 AM 10:49

RECEIVED
FEDERAL ELECTION COMMISSION
91 DEC 16 AM 11:13

CLOSED

December 9, 1991

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

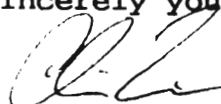
Dear Ms. Lerner:

As you will recall, we discussed on the telephone, the other day, payment of the penalty to which the Douglas County Republican Central Committee agreed some time ago. Since I have now received a copy of the agreement, signed, and filed, from your office, I am enclosing that payment.

Please find enclosed a check, drawn upon our account, in the amount of One Thousand Dollars (\$1,000.00). This amount is being tendered in full satisfaction of any penalty which may be owing, as a result of the agreement entered into in 1990. You may recall that you FAXed that agreement to me, a few days ago.

If I am mistaken with regard to this being a final payment in full and complete satisfaction of that agreement, please do not negotiate the check, and notify me immediately. Unless I hear from you otherwise immediately, I will assume that this matter is resolved.

Sincerely yours,



Chris Miller, Chairman
Douglas County Republican
Central Committee

CM/af
Enclosure-Check
cc: Mr. Richard Todd
Mr. Scott Morgan

21040384048



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

Dec. 13, 1991

TWO WAY MEMORANDUM

TO: Fabrae Brunson
OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECT: Account Determination for Funds Received

91040884049

We recently received a check from Douglas
County Republican Central check number 1007, dated
Dec. 4, 1991, and in the amount of \$1000.00.
Attached is a copy of the check and any correspondence that
was forwarded. Please indicate below the account into which
it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Fabrae Brunson *fpb*
OGC, Docket

In reference to the above check in the amount of
\$ 1,000, the MUR number is 3014 and in the name of
Douglas County Republican Central. The account into
which it should be deposited is indicated below:

- ☐ Budget Clearing Account (OGC), 95F3875.16
- ☒ Civil Penalties Account, 95-1099.160
- ☐ Other: _____

Fabrae Brunson
Signature

Dec. 16, 1991
Date

DOUGLAS COUNTY REPUBLICAN
CENTRAL COMMITTEE

P.O. BOX 1511
LAWRENCE, KS - 66044

1007

12/4 1991

83-1464/1011

PAY TO THE
ORDER OF

FEDERAL ELECTION COMMISSION

\$ 1,000⁰⁰/₁₀₀

One Thousand and ⁰⁰/₁₀₀

DOLLARS



Douglas County Bank
Lawrence, Kansas 66044

Richard L. Toth

MEMO

MUR 3014

⑆10114646⑆100701364⑆11⑆

91040884050