



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

THIS IS THE BEGINNING OF MUR # 3534

DATE FILMED 9/28/93 CAMERA NO. 4

CAMERAMAN E.E.S.

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OGC# 4686

92 MAY 12 PM 11:02

Robert Williams
104 McNeely Rd.
Columbia, SC 29223

May 9, 1992

The Honorable Jo Ann Aikens
Chairwoman
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

92 MAY 12 PM 11:10

Dear Mrs Aikens:

Re: Request for Investigation of the
Bill Clinton Campaign With
Regards To The Enclosed Documents
For Possible Violation of
Federal Elections Laws

I enclose, herewith, a number of
documents outlining my reasons for
requesting the referenced investigation.

I particularly direct your attention to the

Seventeen (17) page document written to
Gary Baker, Executive Director of
the South Carolina State Ethics
Commission, commencing especially
at page three (3), the letters to the
U.S. Attorney General, William Barr, Chief
Robert Stewart of the South Carolina
Law Enforcement Division, Richard
Harpothian, 5th Circuit Solicitor of
South Carolina, and the letters from
Carroll Campbell, Governor of South
Carolina and Jim Miles, Secretary
of State of South Carolina.

Please beware that Darrell Jackson
and Bishop H.C. Jackson may have or
maybe attempting to distance themselves
from the Clinton Campaign and
Heyward Panuiter, a partner in Sunrise
Enterprise, and the Corporation, possibly,
because they were aware of the various
request for investigations to be made
by me.

Ray Lee Belton, my close friend, a
member of the Bibleway Church of Atlas

Head, and a fellow Ordained Minister,
was asked by me to meet as an
impartial observer and as the Bible
requires Christian brethren to do when
there is unreasonable differences, with A.C.
Jackson and his son, Darrell Jackson,
and me regarding their financial
involvement with the Bill Clinton
Campaign as a Pastor and Assistant
Pastor and other matters contained in
the documents attached hereto. In this
meeting, both A.C. Jackson and Darrell
Jackson expressed their financial
involvement with the Bill Clinton
Campaign. Darrell Jackson also stated
in this meeting that they ^{had} Judie
Miller, a Political Consultant, to help
run the Bill Clinton Campaign
in South Carolina.

I know that I have sent you a great
deal of material to read, but thought
it was necessary to give you a clearer
understanding of my request.

Please let me hear from you soon, and if
you should have a question, please
call me at 748-3254 or 788-5494.

with kind regards

Sincerely,

Robert Williams

STATE OF SOUTH CAROLINA
OFFICE OF THE SECRETARY OF STATE

JIM MILES
SECRETARY OF STATE



P.O. BOX 11350

COLUMBIA
29211

May 8, 1992

Mr. Robert L. Williams
104 McNeely Road
Columbia, SC 29223

Dear Mr. Williams:

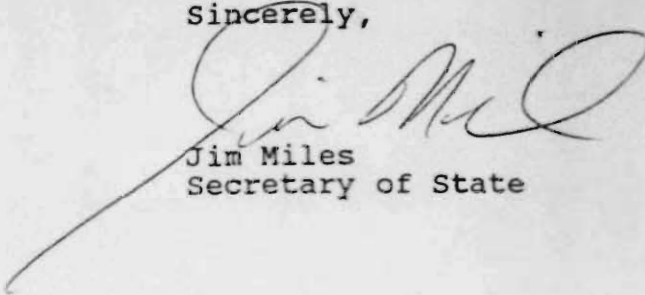
Thank you for your correspondence of May 5, 1992.

My staff has carefully reviewed the information you sent. As most of your correspondence deals with allegations surrounding a United States Presidential campaign, this office has no jurisdiction.

I would suggest you forward your information to the nearest office of the United States Attorney.

Thank you for your time.

Sincerely,


Jim Miles
Secretary of State

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Robert Williams
104 McTeely Rd
Columbia, SC 29223
May 4, 1992

The Honorable Gary R. Baker
Executive Director
State Ethics Commission
5000 Thurmond Mall
Suite 111
P.O. Box 11926
Columbia, SC 29211

Dear Mr. Baker:

Re: Darrell Jackson Statement of Economic
Interest Form and Campaign
Disclosure Form -- Annual Update/
Quarterly Update

I believe it was on either April 22, 1992
or April 23, 1992 that I visited your
office to pick up copies of Darrell
Jackson's forms referenced above. I
and your office personnel did locate the
most recent Statement of Economic
Interest Form, but were unable to
locate a most recent Campaign Disclosure
Form. With my limited knowledge of the
Ethics Law and upon information and belief,
Mr. Jackson's Statement of Economic
Interest Form appears to be incomplete.

For example, Hayward Bamater, a partner in Mr. Jackson's Company, Sunrise Enterprise of Columbia, Inc., was very recently or is a registered lobbyist at least in the State of South Carolina, but is not listed in item 19 of page 3 of the Economic Interests form. I am of the belief and am informed that Mr. Jackson and Sunrise Enterprise of Columbia, Inc., have been awarded or currently hold contracts for which they are receiving monetary compensation from state and local public agencies in excess of \$500.00 (item 13 of page 2 and item # 20 of page). Item # 22, page 4 may also be applicable to Mr. Jackson. See item # E of the enclosed Charter of Sunrise Enterprise of Columbia, Inc., filed December 4, 1986 and Notice of Change of Registered Office or Registered Agent or Both filed January 3, 1989 with the State of South Carolina Secretary of State. H. C. Jackson, the father of Darrell Jackson, and an incorporator, shareholder and silent partner and Chairman of the Board, I believe, of Sunrise Enterprise of Columbia, Inc., is in a position to provide this Commission with information pertaining to contracts received from state and local public agencies. Records from the various state and local public agencies should also be available.

For the Commission's information,
Darrell Jackson, I believe and am
informed by the office of Bishop
F.C. James on April 21, 1992 or April
22, 1992, is the Executive Director of
The South Carolina Coalition of Black
Church Leaders, Inc., a non-profit
corporation within the meaning of
section 501(c)(4) of the Internal
Revenue Code of 1986. The managing officers
of this Coalition is Bishop F.C. James and
Bishop A.C. Jackson (this is the same A.C.
Jackson that is listed as a partner
in Sunrise and the father of Darrell
Jackson). Darrell Jackson as of the same
date above, was said by Bishop F.C.
James' office to also be the Executive
Director of Project ADAM, an anti-
drug and alcohol program operated
and funded, I believe, through grants,
possibly state, local and federal grants,
through The South Carolina Coalition of
Black Church Leaders, Inc. I am of the
belief and am informed that Darrell
Jackson and A.C. Jackson (Bishop) and
their company Sunrise Enterprise of
Columbia, Inc., drafted grant proposals for
state, local and or federal public agency
funding, with the knowledge and intent
that they would be awarded the contract

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from the South Carolina Coalition of Black Church Leaders, Inc. to Manage this Project. Darrell Jackson, A.C. Jackson and Sunrise, I am informed and believe to Manage Project FODAM, and Darrell Jackson as Executive Director of same may be receiving additional compensation from the Coalition of Black Church Leaders for this position as well as a share of the proceeds paid directly to Sunrise. (See enclosed Certificate of Incorporation for The South Carolina Coalition of Black Church Leaders, Inc. dated July 15, 1992). A.C. Jackson, Darrell Jackson's father is also believed to be Co-Chairman or Vice-Chairman of Project FODAM.

- I respectfully request of this Honorable Commission that it render an opinion as to whether or not payments made by Bob Cable and some other public Officials during the course of campaigning to Darrell Jackson and Sunrise Enterprise of Columbia, Inc., can be classified as lobbying related expenses; the same would be the case with the Bill Clinton Campaign for which Darrell Jackson and Sunrise Enterprise of Columbia, Inc. were/are being paid to manage. (See the enclosed four pages from Campaign Disclosure of Bob Cable; two of the pages show payments to Sunrise and Darrell

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Jackson of \$27,856.98 for consulting fees,
etc., and the others show contributions of
\$1,100.00 to Mr. Coble's Campaign from
Darell Jackson, Heyward Bannister and
Sunrise Enterprise of Columbia, Inc. I am informed
and of the belief that Darell and H.C. Jackson and Sunrise
Enterprise are currently working a contract for the City
of Columbia.
During the day of my inspection of Darell
Jackson's file, unless the information was
mis-filed or I overlooked it, there was
no Campaign Disclosure, especially as it
relates to Campaign Contributions, beyond
July 8, 1988 up to the information filed by
Mr. Jackson on April 7, 1992 and received
by your office on April 9, 1992. I have
some evidence that Mr. Jackson has received
Contributions beyond 1988; Mr. Jackson is
my former Assistant Pastor and his
father, H.C. Jackson, my former Pastor and
I have recently written and spoken to them about
what I believe to be questionable ethical practices.
If the law requires, I would appreciate
more detailed information from Mr.
Jackson, if possible. The public would also
appreciate this information. It is my belief that
Darell Jackson has knowingly used the Coalition of
Black Church Leaders, Inc. for personal gain; unfair political
Please let me hear from you soon.

Sincerely,

Robert Williams

PS By the time you receive this letter, I will
probably have reviewed Mr. Jackson's file again
for more updated information.

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with respect to Darrell Jackson's involvement
with the Bill Clinton Campaign, the
Coalition of Black Church Leaders, Inc.,
and Project ADAM and Sunrise
Enterprise of Columbia, Inc., I believe
that there is sufficient evidence for
other entities such as the South
Carolina Elections Commission, the
State Tax Commission, the Internal
Revenue Service, South Carolina Law
Enforcement Division, the Solicitor,
Richard Hargrothian, the Federal
Elections Commission and the US
Attorney General, Mr. William Barr to
commence investigations for possible
violations of State and Federal laws.
By the time you receive this letter, I
will have presented this letter and
enclosures to some of the entities named
above, as well as some other information
and potential witnesses. I will also be
communicating with our Secretary of State
regarding possible Charter violations
by Darrell Jackson and A.C. Jackson,
Darrell's father, who is also a public
official serving as a Commissioner with
Richland County Department of Social
Services, the South Carolina Coalition
of Black Church Leaders/Project ADAM

with respect to them and possibly others within the Organization(s) ^{using these} Organizations for what appears to be purely personal gain and for political purposes, particularly as it relates to Governor Bill Clinton and his Campaign for President of the United States. There is circumstantial evidence and there is enough documented evidence that Darrell Jackson, H.C. Jackson, Darrell and H.C. Jackson are Assistant Pastor and Pastor of the Bidleway Church of Atlas Rd., respectively, and Bishop F.C. James lobbied the Black Church leaders who are under their jurisdiction and who are a part of the South Carolina Coalition of Black Church Leaders, Inc., and through their National Religious Organization(s) affiliation requested and to a great extent demanded of them that they, as well as their congregations, vote for Governor Bill Clinton, thereby closing their doors to all other political candidates messages. I was informed by the office supervisor of the Bill Clinton Campaign that Darrell Jackson, H.C. Jackson and Heyward Barrister were being paid by the Bill Clinton Campaign, through their Company Sunrise Enterprise of Columbia, Inc. to manage his Campaign in South Carolina; Judith or Judie Miller, a political consultant hired by Darrell Jackson, H.C. Jackson, Heyward Barrister of Sunrise, to serve as the up-front day to day manager of the Clinton Campaign here, apparently to disguise their questionable relationships as Assistant Pastor, Pastor and lobbyist. I was also

informers
that Bishop James had made a couple of visitations, may have been one, I can't recall, for Bill Clinton's local Campaign office here in Columbia, SC on Hampton St. to Clinton's National Campaign Headquarters in Arkansas to pick up Campaign literature. I am not sure whether Sunrise Enterprise paid for this trip though money received from Bill Clinton and even if that is not the case, this action is questionable for Darrell, A.C. Jackson and Bishop F.C. James, all of whom who are ordained ministers, especially in the case of A.C. Jackson and Darrell Jackson, not to exclude Bishop James, particularly when they use the Church Pulpit and religious gathering to endorse Bill Clinton and to encourage these Church members to do so without giving other Candidates an opportunity to present their messages. Over or nearly 1,000 persons attending the Bibleway Church of Atlas Rd. witnessed the distribution of Bill Clinton literature (by basically the membership of this Church to these persons) a week before the primary, at a Church service. Though the literature (a list of persons supporting Clinton, and the reason for their support), for the most part was distributed in the lobby of the Church, which is for all practical purposes a part of the Church Sanctuary, it was produced by Darrell Jackson's, A.C. Jackson's, Heyward Bannister's and Sunrise Enterprise direction, paid persons in the Bill Clinton Campaign through Sunrise Enterprise, Inc. As a former recent member and ordained minister (Elder)

of the Bible Way Church of Atlas Road
and the Bibleway Church Worldwide
Organization, I know for a fact that
if the Church was aware of, especially
A.C. Jackson's financial involvement
in the Bill Clinton Campaign, that
they would not have ratified the
introduction, the encouraging from the
Pulpit to take copies of the literature,
Nor the distribution of this literature
on the Church grounds. Therefore, either
A.C. Jackson and Darrell Jackson,
both Pastor and Assistant Pastor,
respectively, as well as Public Officials,
in consultation with each or with
their Church Executive Trustees and or
Trustees took it upon themselves to
introduce, encourage, the taking of from
the pulpit and had distributed this
literature. Records from Darrell Jackson's
Campaign Disclosure for 1988, reveals he paid
a Minister and Deacon (of the Bibleway
Church of Atlas Road) Minister Harold
Cuff and Deacon Roy Wiggins to
solicit votes for various Candidates
that Sunrise Enterprise of Columbia, Inc.,
I now understand was retained in
some form to help manage or manage some
their Campaigns (See Attachment from
Darrell's Disclosure of 1988 and Livola
Taylor, House of Representative, for 1991).

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On at least three different occasions,
I can recall H.C. Jackson as pastor
of the Bibleway Church of Atlas
Road, during Sunday morning services
and from the pulpit, endorsed, ~~asked~~
demanded to a great extent in one case, that
the congregation of nearly a thousand
(1,000) persons or so vote for and
consider candidates; two of the candidates
were physically present when the statements
were made, the other Senator Theo
Mitchell, who was running for Governor
at the time was not present; Bob Coble,
current Mayor of Columbia, S.C. and Fivola
Taylor a member of the House of Representatives
in the State of South Carolina are the
other two candidates that running for
office -- Mr. Coble 1990 and Mr. Taylor
1991 (for seat removed from Jim Faber
for "Lost Trust" involvement). At the time
of these statements, I had absolutely no
knowledge or idea that H.C. Jackson
and Darrell Jackson, Assistant Pastor,
were paid agents of Mayor Coble's
Campaign and I doubt very seriously
whether anyone in the congregation,
including Darrell's and Bishop's family
and possibly some members of the
Churches Executive Trustees, knew
of these payments, which attached records
from Mr. Coble's Campaign for Mayor
reveals to be \$27,856.98. (In general
conversation with a friend of mine
mentioned, I believe, that Darrell Jackson
and (Bishop) H.C. Jackson and their

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Corporation, Sunrise Enterprise of Columbia, Inc., have received Contracts from the City of Columbia (over a period of time I imagine) totaling nearly \$100,000.00. I cannot verify this and have not had the time nor resources as one person to thoroughly evaluate this. There is one person, however, whom I met some years ago, while doing some recruitment work for the Chamber of Commerce, who operates a Company somewhat similar to that of Darrell Jackson and H.C. Jackson, Sunrise Enterprise of Columbia, Inc., and who competes for City, State and Federal Contracts just as Sunrise Enterprise and the Jacksons do, if subpoenaed, will provide valuable information on the Jackson and Sunrise Enterprise with respect to the aforesaid entities. Mr. William "Bill" Chapman, a former partner in the Jacksons Company, if subpoenaed, will provide the greatest insight, I believe, to the mode of operation of Sunrise and the Jacksons with respect to the entities named above.

With regards to Livola Taylor, who at the time of her Candidacy for House of Representative, was a member of Richland County one School Commission along with Darrell Jackson, Bishop Jackson urged the Church Congregation to consider her Candidacy because she had done much for the Church. Though

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I suspected that what they were doing was wrong; I had no legal basis because of my lack of knowledge of this component of the law, to challenge what they were speaking across this Church Pulpit; However, I did inform some of my very close friends on the Churches Executive Trustee Board and other Church members that I believed Darrell Jackson and A.C. Jackson were violating the Law. Once I found out that Darrell and A.C. Jackson were involved financially involved with the various persons named, I knew for a fact that they had violated some law, even if was only the By-Laws of the Church. (In trying to determine what Livola Taylor may have done for the Church to receive A.C. Jackson's endorsement in our Church service, I again checked with at least two persons in the Church who seemed to think that Darrell Jackson and A.C. Jackson had Livola Taylor to appeal on their behalf and that of the Bibleway Child Development Center to the Richland County Department of Social Services Commission to maintain or have re-instituted a grant, maybe Title 20 grant, that had or was about to expire because of possibly structural or

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some other violations. I did confront
Darrell and A.C. Jackson in February of
1992 regarding Livola Taylor and all
they would say was that the statements
they mentioned regarding Mrs Taylor
was made because she had helped the
Church; Roy Belton, A member of the Executive
Trustees, Sunday School Superintendent locally
and worldwide in the Bible Way Church
Worldwide Organization, a very close
and best friend I would say, and to a
great extent ~~was~~ forced into the role of
a mediator in my quest to prevent
Darrell Jackson and A.C. Jackson from
using their positions as Public Officials, as
Assistant Pastor and Pastor, and the Official
Positions of others to gain financially
or in general gain an unfair Advantage
over others, Was present in this meeting,
one other informal meeting and was
made aware most recently of several
other occasions where Darrell Jackson
and A.C. Jackson attempted to dissuade
me, as representatives for Governor Bill
Clinton and his Candidacy, from
pursuing a Federal Civil Rights/Constitutional
violation lawsuit and United States
Justice Department Investigation
of the law firm of, I believe, Mr. Clinton's
South Carolina Chairman, an Assistant
Attorney General of South Carolina and

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therefore, the Attorney General's Office,
and other Public Officials, because of
the Political Impact The Lawsuit and
Justice Department Investigation Could
Have On The Clinton Campaign. Meryl
Heyward, a Deacon, good friend and
member of the Executive Trustees of the
Bibleway Church was recently made aware
of the Jackson's attempt to bribe and
dissuade me, because of what appeared to be
purely financial and political reasons.
I may have informed both Mr. Belton,
Mr. Heyward, and Curtis Hamilton, a Deacon
Executive Trustee in this Church and former
head of the Deacons Association of the
Bibleway Church Worldwide, Inc., to some
degree, as well as other church members,
with regards to the above and with
regards to their attempts to keep this
material from Governor Carroll Campbell
and or the South Carolina Law
Enforcement for an investigation.
(By way of a recent letter with supporting
documents to Lawrence H. Campbell,
Presiding Bishop and Apostle of The
Bibleway Church Worldwide, Inc.,
I have made him aware of Darrell
Jackson's and A.C. Jackson's actions,
especially as ordained ministers of the
Gospel. Should you choose to write or call
Mr. Campbell, you can reach him at

151 Grant Street, Danville, Virginia 2454.
telephone numbers 1-800-445-0866 or
804-793-9493). Though I have not verified
this, it has been suggested by a Church
friend that Darrell Jackson, H.C. Jackson
and their Corporation, Sunrise Enterprise
of Columbia, Inc., were most recently or
are engaged in contract with the Bibleway
Church World Wide Organization. If this
is true, then I am of the belief that
their association would be in the form of
lobbyists or Political Consultants and in
some way tied to the Bill Clinton Campaign
in an unfair fashion or with an Anti-drug
Program similar to Project ADAM referenced
earlier in this document which was operated
through the South Carolina Coalition of
Black Church Leaders, Inc. An examination
of Bill Clinton's Campaign records with
the Federal Elections Commission and
a discussion with the leadership of the
Bibleway Church World Wide Organization,
Plus Roy Belton, Meryl Heyward, Curtis
Hamilton and others may reveal some
valuable information.

In regards to Bishop F. C. James referenced
earlier, video tapes from television stations
suggest that he is a spokesperson for the
Bill Clinton Campaign. The Videos also

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suggest very strongly and clearly that he
as Bishop over the South Carolina District
of the A.M.E. Church, Inc., told those
Persons under his supervision to vote for
Bill Clinton in the recent South Carolina
Primary. As a matter of fact, in an interview
made during the day of the primary by WIS,
TV, a Black female clearly states that
she voted for Bill Clinton because her
Bishop, Fredrick C. James and the NAACP
told her to do so. On the other TV
interview, following the Jennifer Flowers
revelation regarding Bill Clinton, Bishop
Fredrick C. James appeared as the spoken person
defending Mr. Clinton and backing the news
media. An examination of the leadership of
the A.M.E. Churches, as well as the membership
may reveal further that these religious
organizations were and or being used for
unfair political and other purposes by
individuals named herein. (For your information,
my District Civil Action Number is 3:90-1424-0,
and my Federal Appeals number in the 4th
Circuit Court of Appeals is 91-2173; see
select sections of these actions attached, which
should be of benefit to this Commission).

Below are some agencies/commissions that
Darrell A.C. Jackson and their Corporation,
Sunrise Enterprise of Columbia, Inc., may have
or engaged in contract with: (a) ABC
Commission, (b) Lexington/Richland Counties

Alcohol, & Drug Abuse Council, (c) South Carolina Educational Television Commission; The Attorney General of South Carolina may be familiar with grants or contracts awarded relating to Drug Abuse.

During my investigation of Danell Jackson and A. E. Jackson, it was suggested to me that the resumes of my wife, Carrie Williams, Bernedette Evans and maybe one other person, who were never employed to my knowledge by the Bible Way Child Development Center, were used improperly to secure some form of certification and funding (maybe Title 20 funding, I am just not sure) via the Richland County Department of Social Services. Although it has been some years, if the honorable Commission decides to pursue my complaint and if it determines that there was some form of misrepresentation in receiving the certification or funding, I will be further devastated because of the faith I placed in these men and their religious institutions. (I have also been informed that Danell Jackson maybe leaving Sumner or before May 15, 1992.) Further investigation continuing.

Thank you very much in your consideration of this matter. I look forward to hearing from you soon.

With kind regards,
Robert Williams

Mr. Baker,

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It is being rumored that Danell Jackson is about to break away from Sunrise Enterprise, Inc. Because of questionable ethical behavior. He may file amended documents with your Commission after a break-up is consummated, if the rumors are true. Heyward Bannister and A.C. Jackson Partners in Sunrise, (Heyward a lobbyist, at least registered with the House of Representatives, at that late in 1991, and A.C. Jackson a Public official serving on the Department of Social Services (Richland County Board/Commission), if they haven't already, may file amended disclosures and or Economic Interest statements. The actions of Bishop F.C. James as indicated in the 17 page document to you, may require him to file, I am not sure and ask your opinion on this.

Robert Williams
104 McNeely Rd.
Columbia, SC 29223

May 4, 1992

The Honorable Chief Robert Stewart
South Carolina Law Enforcement Division
P.O. Box 125
Columbia, SC 29214

Dear Chief Stewart:

Re: Request for SLED Investigation of
the Contents of Enclosed District
Court Action 3:90-1424-OH, Appeals
Court Action 91-2173 (Robert Lee
Williams vs C. Errol Catel, et al)
and Contents of Seventeen Page Letter
to the Honorable Gary Butler of
the Ethics Commission Dated
May 4, 1992

Herewith enclosed please find the documents
referred. Also enclosed is my original
letter to the office of Governor Campbell,
a response letter from Mr. Mark R.
Elam, Senior Counsel to the Governor, on
the Governor's behalf and a most recent
letter from the United States Justice.

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Department.

By way of a copy of this letter to US Attorney General William Barr, along with some other information not presented to him previously, I am asking him to re-evaluate certain components of my Complaint with respect to Darrell Jackson, H.C. Jackson, their financial involvement with the Bill Clinton Campaign and their various attempts as my Assistant Pastor and Pastor, respectively, to bribe and to dissuade me from pursuing my Federal Lawsuit, the Justice Department investigation, because of the impact such lawsuit and Justice Department investigation could have on the Clinton Campaign if ever made public because a law firm and therefore an individual named in the lawsuit and investigation is Clinton's South Carolina Campaign Chairman. I am also asking the US Attorney General to investigate and determine whether Darrell Jackson, H.C. Jackson and Bishop F.C. James and or others, through possible National Coalition of Black Churches and Anti-drug projects, such as Project FIVE as addressed in my seventeen page document dated May 4, 1992 and managed by Sunrise Enterprise,

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have violated section 501(c)(4) of
the Internal Revenue Code of 1986.

Also by way of a copy of this letter,
I am making my request known
to the other following Agencies for
appropriate investigations for possible
violations: (1) The South Carolina Elections
Commission; (2) the Internal Revenue
Service; (3) Solicitor Richard Harpootlian;
(4) The Federal Elections Commission;
(5) Jim Mills, Secretary of State for
South Carolina.

Should you need to talk to me,
Please call me at 788-5494 or
748-3254 (work).

Thank you so very much for taking
the time to consider this matter.

With kind regards
Robert Williams

93040960027

Robert Williams
104 Mc Neely Rd
Columbia, SC 29223

May 5, 1992

The Honorable Richard Harpothian
Solicitor of the 5th Circuit
1701 Main Street
Columbia, SC 29201

Dear Mr. Harpothian:

Please examine the attached materials
and Case file and provide Advice
to me and my family as to how you and we are to proceed.
Please see especially the letter from
Governor Campbell's Senior Legal
Counsel. Call me at 748-3254 or 788-5494
should you have a question.

Sincerely,

Robert Williams

PS I agree that I still feel that justice has
escaped me. It appears that many have conspired
against me and my family, especially Bishop A.C.
Jackson and Darrell Jackson, my former Pastor and
Assistant Pastor, who through apparent spiritual Counsel
attempted to obstruct justice by trying to dissuade and
discourage me from pursuing Federal and State actions.

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Mr. Harpothan, I so sincerely want
you pursue prosecution, if at all possible,
of as many persons and entities named
herein, especially Darrell Jackson, A.C.
Jackson and the Bill Clinton Campaign
for what they have done and attempted
to do to our family and me. Again,
during our most vulnerable period when
they should have been providing spiritual
counseling to us, they exploited me, Pressing
me beyond measure, in anger at times,
and with statements such as, these people have
a lot of money and power and could
cause harm to you and your family if
you are not careful, Not to pursue my
Case in the Federal Courts, the United States
Justice Department, through SHED and
the Governor's Office, because of the
Political Impact This Could Have On
The Bill Clinton Campaign For President,
If Revealed To The Public That A
South Carolina Campaign Chairman, Is
Involved Or Named In A Federal Law-
Suit And Justice Department Investigation
Had They informed me Before hand that
they, as Ordained ministers, Public Officials,
Assistant Pastor and Pastor Of The Bibleway
Church Of Atlas, Executive Directors of
The South Carolina Coalition Of Black Church

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Leaders, Inc. and Project FIDM (Darnell Jackson), Chairman and or Co-Chairman of The South Carolina Coalition of Black Church Leaders, Inc. and Project FIDM (A.C. Jackson), were being paid by Bill Clinton and therefore, consequently have, at least, an indirect financial relationship, if not a direct financial relationship with an entity or entities named in My Lawsuit and Justice Department Investigation, I would not have and opposed to them anything.

I must and am requesting A Major investigation by The Federal Elections Commission and The Justice Department Investigation, as well as the other investigations stated throughout documents

I believe that the Jacksons, their Corporation, Sunrise Enterprise of Columbia, Inc., The Bill Clinton Campaign have assisted in obstructing justice and violating My Civil Rights.

Garret Williams
104 McNeely Road
Columbia, SC 29223

May 7, 1992

Mr. Donald L. Breihan
District Director
Internal Revenue Service
1835 Assembly Street MDP-01
Columbia, SC 29201

Dear Mr. Breihan:

Re: Request For Investigation of Possible
Violation of Section 501(c)(4) of the
Internal Revenue Code of 1986 by
the South Carolina Coalition of Black
Church Leaders, Inc. (Project ADAM)

Please commence an investigation of the
referenced and the particular persons named
in the Seventeen page document enclosed,
commencing particularly at page 3. Other
documents are included for your information.

I have addressed this Mr. William Barr, U.S.
Attorney General in a letter just written
as well as other agencies cited in the
various documents attached.

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I have been informed that Russell Jackson
is or maybe attempting to distance himself
from Sunrise Enterprise of Columbia, Inc.,
because of possible questionable unethical
behavior with the referenced.

Should you have a question, please call me
at 788-5494 or 748-3254.

Sincerely,

Robert Williams

93040960032

Robert Williams
104 McNeely Rd
Columbia, SC 29223

May 5, 1992

The Honorable James M. Miles
Secretary of State
Wade Hampton Office Bldg
Box 11350
Columbia, SC 29211

Dear Mr. Miles:

Re: Investigation to Determine if the
Coalition of Black Church Leaders
and Project ADHAM Violated Charter
for Religious/Non-Profit Organizations

Included within the enclosed information
is my reason for requesting this investigation

Please see correspondence to Chief Robert
Stewart of S.C.E.D.

Call me at 748-3254 or 788-5494 should
you have a question.

Sincerely
Robert Williams

Robert Williams
104 McNeely Rd.
Columbia, SC 29223

May 5, 1992

The Honorable E. Gregorie Frampton
Executive Director
South Carolina Tax Commission
Columbia Mills Bldg.
301 Germain
Box 125
Columbia, SC 29214

Dear Mr. Frampton:

Re: Investigation of Possible Grant/Tax
Exemption Violation of The Coalition
of Black Leaders of South Carolina,
Inc./Project FIDM

Included within the enclosed information
is my reason for requesting this
investigation.

Please see Correspondence to Chief Robert
Stewart of SLED.

Call me at 748-3254 or 788-5494 should
you have a question

Sincerely,
Robert Williams

23040960034

Robert Williams
104 M. Healy Rd
Columbia, SC 29223
Tel # (803) 788-5494
March 9, 1992

Dear Governor Campbell

93040960035
I respectfully request that a SLED investigation Commence as soon as possible regarding the contents of the enclosed documents. If at all possible, I request that persons independent of the State Attorney General's Office, including the Attorney General himself, Mr. Medlock, be used to work with SLED. You will see why I am asking this as you review the materials in this case. There appears to have been a major conspiracy with persons primarily related to the Democratic Party.

I and my family are Black people and we have always believed in the proper administration of justice. We have received threats and intimidating telephone calls since we started pursuing justice. The Attorney General, the Legislative Black Caucus, the Senate Judiciary Committee, the Coalition of Black Churches

the NAACP, all have been informed in writing of our plight and for all practical purpose, none have responded. In regards to a letter from Mr. Marshall Williams, it appears as if he is trying to get me to drop the matter. The refusal of the Legislative Black Caucus and the NAACP to forcefully speak against the Civil Rights or Constitutional Rights maybe because I am suing a Black Assistant Attorney ^{General} Filice Broadwater.

As a Black Ordained Minister, formerly with the Bibleway Church of Atlas Rd and the Bibleway Church World Wide incorporated, until forced out recently by the deplorable acts of Darrell Jackson, Assistant Pastor and Bishop A.C. Jackson, Pastor, do not take racial sides when it comes to the Administration of Justice. Bishop Jackson, and especially Darrell Jackson both of whom are receiving huge sums of money from Bill Clinton Campaign, have spoken to me on several occasions to try and prevent me from continuing pursuit of this matter through Federal Court, the

23040960037
United States Justice Department and
through your Office, because of the
Political impact it could have
~~had~~ on the Current Campaign.
They are receiving this money through
Sunrise Incorporated; they may have
attempted most recently to divert
the money since they may have fears
that I will expose them through
this company and their association with
Project ADAM & the Coalition; ^{of Black churches} the
Project or Coalition have violated what
they were designed for or should have
been designed for and are being used
by the Jackson's and the Bill Clinton
Organization for solely Democratic
political means, and more importantly
to exclude other Democratic Presidential
Candidates from competing against
Bill Clinton.

I would also respectfully request
that SLED investigate the Bible Way
Child Care Development Center. It
appears that the Original awarding
of the Contract some years back was

93040960038
base upon some misrepresentation. It appears from what I have been told that some of the resources that were used to get the Contract, these qualified persons were never hired. Not only that, I was informed that the DSS Contract was terminated recently either because the facilities did not and still do not I believe meet State requirements, and that Darrell Jackson, especially, and Bishop A.C. Jackson contacted Lavola Taylor, House Member, who interceded improperly, I believe, to have the Contract with DSS reinstated. Please also investigate funds, that I have been informed, funneled through the Attorney General's Office to "Just Say No" and or through Project ADAM, possibly via Sunrise Incorporated, which maybe political payoffs.

I believe that Bibleway Church of Atlas Rd, primarily through the influence of Darrell Jackson, former political Director of the Democratic Party, have made

Contributions in the form of Money to
a former Political National Candidate.

Governor Campbell, I am a just and
honest ^{man} and for the sake of the
integrity of the Church as an
institution, and to expose to my people
and all of God's people truth, I
make my request.

PS The Charleott Observer has been
running a series on Mr. Medlock
for maybe the past two months. I
did not give them this information
and am not exactly sure if it came
from an associate or from someone
familiar with this matter in the Court
system.

Thank you very kindly for your time
and please keep up the excellent
job that you are doing

Sincerely,

Robert Williams

93040960039



State of South Carolina

CARROLL A. CAMPBELL, JR.
GOVERNOR

Office of the Governor

Post Office Box 11369
COLUMBIA 29211

April 15, 1992

Mr. Robert Williams
104 McNeely Road
Columbia, South Carolina 29223

Dear Mr. Williams:

The Governor has received your letter and the accompanying information. The Governor has asked that I respond on his behalf and I do apologize for the delay.

As my law clerk, Mr. Covert, discussed with you, the Governor does not have the ability to conduct investigations. Therefore, I would encourage you to submit your information to the South Carolina Law Enforcement Division (SLED) for their review. SLED would be the most appropriate agency to investigate your claims. You also may wish to contact your local Solicitor and seek his advice. I would remind you that neither of these agencies are required to investigate any allegations, they have complete discretion as to what cases they will or will not investigate. As for your claims about the Clinton Campaign, the South Carolina Election Commission would certainly be interested in any proof of your allegations that you could offer.

Again, thank you for taking the time to share your information with the Governor. If I may be of any assistance to you in the future, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Mark Elam".

Mark R. Elam
Senior Counsel to the Governor

MRE/wc

00403



U.S. Department of Justice
Civil Rights Division

Washington, D.C. 20530

JRD:PLF:mlw
DJ 144-67-0

09 MAR 1992

Mr. Robert Lee Williams
104 McNeely Road
Columbia, SC 29223

Dear Mr. Williams

This is a response to your complaint that you have been deprived of your civil rights.

We have carefully reviewed the information which you furnished. However, we have concluded that there is no prosecutable violation of federal criminal civil rights statutes. Accordingly, we are unable to assist you.

You may wish to contact the nearest legal aid program or the local bar association to determine whether they may be able to assist her.

Sincerely,

John R. Dunne
Assistant Attorney General
Civil Rights Division

By:

Peggy L. Fong
Peggy L. Fong
Paralegal Specialist
Criminal Section

93040960041

STATE ETHICS COMMISSION
STATEMENT OF ECONOMIC INTERESTS FORM

TYPE OR PRINT
LEGIBLY

Disclosure for Calendar Year 19 - Annual Update Due April 15

01 Have you previously filed a Statement of Economic Interests? ☐ Yes 02 Social Security or
03 Name: ☒ Mr. ☐ Mrs. ☒ No Identification Number 250-11-4857
☐ Ms. ☐ Dr. 04 County of _____
☐ Jackson, Darrell Residence Richland
(last) (first) (middle initial)

05 Home Mailing Address

2936 Dell Drive
Columbia, SC 29209

06 Business or Government Address

P.O. Box 3076
1215 Anthony Ave.
Columbia, SC 29201

Workplace Telephone Number (803) 771-0325

07 Status

☐ Candidate ☒ Elected
☐ Appointed ☐ Employee
☐ Employee-Regulated Business Association
☐ Consultant

08 Position Title(s) and Agency(s):

Current: (a) Commissioner, Rich. Dist. 1

(b) _____

Sought: (c) _____

09 Date of Hire or Appointment _____
mo./yr.

10 Term(s) of Office:

Current 11/90 / 11/92
mo./yr. mo./yr.

Term Sought _____ / _____
mo./yr. mo./yr.

11 Candidates Only:

Date filed as a candidate: _____
mo./day/yr

Election Date(s):

Primary _____
mo./day/yr.

General _____
mo./day/yr.

Special _____
mo./day/yr.

12 CERTIFICATION

I have examined the information I have disclosed herein and certify that the disclosures are true, correct, and complete to the best of my knowledge and belief.

FOR OFFICE USE ONLY

☒ COMPLETE MC
☐ INCOMPLETE
☐ ENTERED APR 15 1992

RECEIVED
APR 15 1992
STATE ETHICS
COMMISSION

(SIGNATURE)

(DATE)

Two copies of this page and the succeeding pages must be completed and returned to the appropriate supervisory office prior to the deadline. This form will be returned if all items are not properly completed and/or the form is not signed.

SEC-5 (Rev. 11-91)

Items 13-23 must include some response. If not applicable, so state for each item.

13 INCOME AND BENEFITS

Income, fees, payments, or additional benefits exceeding \$500 in aggregate received by yourself or a member of your immediate family from state and local public agencies in South Carolina. Identify the source and type of such income or benefits as well as the amount or value.

☒ Not applicable

SOURCE	TYPE	AMOUNT/VALUE

14 REGULATED BUSINESS ASSOCIATIONS

Identify the name of each business with which you are associated which is regulated by the agency with which you are associated or for which you are a candidate. Identify each regulated business, your relationship to that business, and the regulatory involvement by your agency with that business.

☒ Not Applicable

NAME OF BUSINESS	RELATIONSHIP	SOURCE OF REGULATORY INVOLVEMENT

15 REAL ESTATE INTERESTS

Describe any interest by you or a member of your immediate family in property, its location, and present market value (a) where is a potential conflict of interests, (b) if there have been public improvements to this or adjoining property of \$200 or more, or (c) if the property has been sold, leased, or rented to a state or local public agency in South Carolina. Identify the nature of the potential conflict of interests and the nature and value of any public improvements. Identify any state or local public agency in South Carolina which has purchased or is leasing or renting such property. Attach a copy of the contract or agreement.

☒ Not Applicable

DESCRIPTION	VALUE	LOCATION

NATURE AND VALUE OF IMPROVEMENT(S): _____

NATURE OF POTENTIAL CONFLICT OF INTERESTS: _____

AGENCY PURCHASING, LEASING, OR RENTING THE PROPERTY: _____

STATEMENT OF ECONOMIC INTERESTS

Page 3

16 PERSONAL PROPERTY

Identify personal property interests by you or a member of your immediate family sold, leased, or rented to state and local public agencies in South Carolina. Identify the property, its amount or value, and the name of the agency. Attach a copy of the contract or agreement.

☒ Not Applicable

NATURE OF PROPERTY	NAME OF AGENCY	AMOUNT/VALUE

17 BUSINESS INTERESTS

Identify every business or entity in which you or a member of your immediate family hold or control, in the aggregate, securities or interests constituting five percent or more of the total issued and outstanding securities and interests and constituting a value of more than one hundred thousand dollars. Identify the business and your relationship to that business.

☐ Not Applicable

NAME OF BUSINESS	RELATIONSHIP
<u>Sunrise Enterprise of Columbia Inc.</u>	<u>Partner</u>

18 CREDITORS

Identify by name and address any creditor to whom you or a member of your immediate family owed a debt in excess of \$500 at any time during the prior calendar year, including the original amount and outstanding amount. Disclose the name and address of the creditor(s) and the rate of interest being paid. Debts to financial institutions, credit card balances and retail installment contracts are not included. Debts from family members are generally not included (see instructions).

☒ Not Applicable

NAME AND ADDRESS OF CREDITOR(S)	RATE OF INTEREST	ORIGINAL AMOUNT	OUTSTANDING AMOUNT

19 LOBBYISTS

(a) Lobbyist Relationship: Identify any lobbyist who is a member of your immediate family or with whom you or a member of your immediate family is associated in business and your relationship to that lobbyist. (b) Identify any lobbyist or lobbyist principal who has purchased goods or services from you, a member of your household, or an individual or business with which you are associated in excess of \$200. Identify the goods or services purchased, the amount as well as whom such goods or services were purchased from, and your relationship.

☒ Not Applicable

NAME OF LOBBYIST	RELATIONSHIP OR ASSOCIATION

NAME OF LOBBYIST	GOODS OR SERVICES PURCHASED	AMOUNT	PURCHASED FROM	RELATIONSHIP

93040960044

STATEMENT OF ECONOMIC INTERESTS

Page 4

20 GOVERNMENT CONTRACTS

Identify any compensation paid to you by an individual or business which contracts with the public agency with which you are associated. Disclose the name and address of the contractor and your relationship to such contractor. Identify the agency contracted with and the nature of such contract. Disclose the amount of compensation paid to you by the contractor.

☒ Not Applicable

NAME AND ADDRESS OF CONTRACTOR	RELATIONSHIP	NATURE OF CONTRACT	AMOUNT	AGENCY CONTRACTED WITH

21 GIFTS

Identify all gifts, including transportation, lodging, food, or entertainment, given as a result of your public position, or if given by some one seeking a contractual or business relationship with your agency, or if the donor's activities are regulated by your agency and exceed, in the aggregate, more than twenty-five dollars (\$25) in one day or two hundred dollars (\$200) during the calendar year. Identify the type or nature of the gift, its value, and the donor and the donor's relationship to you.

☒ Not Applicable

NATURE OF GIFT	VALUE	DONOR	RELATIONSHIP

22 CONSULTANTS ONLY

Identify all consultant agreements with state and local public agencies in South Carolina. Identify the agency with which you are engaged as a consultant and your consulting relationship to that agency. Disclose the recipient of any contract awarded by you and your relationship to the business receiving such contract.

☒ Not Applicable

AGENCY	RELATIONSHIP	CONTRACT AWARDED TO	RELATIONSHIP TO BUSINESS RECEIVING CONTRACT

23 MEMBERS OF AND CANDIDATES FOR THE GENERAL ASSEMBLY ONLY

Identify representations for compensation of another person before any governmental entity by yourself, an individual with whom you are associated, or a business with which you are associated. Do not include matters (a) required by law, (b) before a court under the unified judicial system, or contested cases as defined in Section 1-23-310. Identify the person(s) represented, the nature of the services rendered, the nature of any contacts made with governmental agencies, and any fees earned as a result of such representation.

☒ Not Applicable

PERSON REPRESENTED	SERVICES RENDERED	NATURE OF CONTACT MADE WITH GOVERNMENT AGENCIES	FEES EARNED

93040960045

(11)

1. Name: **Jackson**
2. Address: **2936 Dell Dr. Columbia S.C. 29209**
3. Date: **3/16/88**
4. County of Residence: **Richland**
5. Social Security or Identification Number: **4857**
6. County of Residence: **Richland**

7. Candidate: ☒ Candidate ☐ Elector
8. Current Salary: **0324200**

9. Name of Agency: **Richland County Council**
10. Date of Appointment: **11/8/98**
11. CANDIDATES
Date Filed as a Candidate: **3/16/88**
Election Date: **6/14/88**
General: **11/8/98** Serial: **550-00**
Amount of Filing Fee: **\$ 550.00**

12. I have not made any further campaign expenses.
13. I have not made any further campaign expenses.
14. I have not made any further campaign expenses.

15. I have not made any further campaign expenses.
16. I have not made any further campaign expenses.
17. I have not made any further campaign expenses.

18. I have not made any further campaign expenses.
19. I have not made any further campaign expenses.
20. I have not made any further campaign expenses.

21. I have not made any further campaign expenses.
22. I have not made any further campaign expenses.
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24. I have not made any further campaign expenses.
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27. I have not made any further campaign expenses.
28. I have not made any further campaign expenses.
29. I have not made any further campaign expenses.

30. I have not made any further campaign expenses.
31. I have not made any further campaign expenses.
32. I have not made any further campaign expenses.

33. I have not made any further campaign expenses.
34. I have not made any further campaign expenses.
35. I have not made any further campaign expenses.

RECEIVED
Daniel Jackson
3/16/88

PART 1

01 TYPE OF REPORT: ☐ 30 Day ☐ Update 02 Social Security or Identification Number _____

03 NAME OF CANDIDATE AND/OR COMMITTEE _____

04 CANDIDATE'S COUNTY OF RESIDENCE _____

05 Mailing Address _____

06 POSITION SOUGHT: _____ 07 AGENCY: _____

08 TYPE OF ELECTION: ☐ Primary ☐ General ☐ Special ☐ Runoff ☐ Convention or Caucus 09 DATE OF ELECTION _____

Successful? Yes _____ No _____

☐ Other Reporting Period From: _____ To: _____

SUMMARY OF RECEIPTS AND EXPENDITURES

10 RECEIPTS (contributions)	UNITEMIZED (contributions of \$100 or less)	ITEMIZED (contributions of more than \$100 itemize on Schedule A)	TOTAL
A. Candidate's Personal Funds			
B. Individual Contributions			
C. In-kind contributions			
D. Other Receipts			
E. Receipts Subtotal			
F. Loans Repaid (Schedule C Sec. 1)			
G. Less Loan Payments (Schedule C Sec. 2)			
H. TOTAL RECEIPTS			

11 EXPENDITURES (all expenditures must be itemized on Schedule B)	TOTAL
A. Filing Fee	
B. In-kind Expenditures (itemize on Schedule B)	
C. Other Expenditures (itemize on Schedule B)	
D. TOTAL EXPENDITURES (itemize on Schedule B)	

12 BALANCE OF CONTRIBUTIONS

A. Contributions on Hand (Beginning of Reporting Period) _____

B. Total Receipts (10. H. above) _____

C. Total Expenditures (11. D. above) _____

D. Contributions on Hand (End of Reporting Period) _____

13 State the ultimate use of the contributions on hand (12. D. above) _____

13 CERTIFICATION: I have examined this report and certify, to the best of my knowledge and belief, it is true, correct, and complete.

COMPLETION OFFICE USE ONLY

☐ COMPLETE _____

☐ INCOMPLETE _____

☐ ENTERED _____

[NAME AND TITLE OF PERSON FILING THIS REPORT]

NOTE: This form will be returned if all items are not properly completed and/or the form not signed.

NO OF CANDIDATE ON COMMITTEE

(date of report)

TOTAL (item (c) must equal amount reported in Section 10, E.)

(listing of all expenditures)

TOTAL (must equal the amount reported in Section 17, D.)

SEC. 4 (Rev. 11-86)

CAMPAIGN DISCLOSURE FORM

PART I

01 TYPE OF REPORT ☒ 30 Day ☐ Judicial 02 Social Security or Identification Number 250-11-4857

03 NAME OF CANDIDATE AND OR COMMITTEE Jackson, Darrell (FIRST) (MIDDLE)

04 CANDIDATE'S COUNTY OF RESIDENCE Richland

05 Mailing Address 1107 Bellevue St. Columbia, SC 29201 (STREET) (CITY) (STATE) (ZIP CODE)

06 POSITION SOUGHT: County Council 07 AGENCY: Richland County

08 TYPE OF ELECTION ☐ Primary ☐ General ☐ Special ☐ Runoff ☐ Convention or Caucus 09 DATE OF ELECTION 6 / 14 / 88 (MO) (DAY) (YEAR)
Successful? Yes x No

☐ Other Reporting Period From: MO DAY YEAR to: MO DAY YEAR

SUMMARY OF RECEIPTS AND EXPENDITURES

10 RECEIPTS (contributions)	UNITEMIZED (contributions of \$100 or less)	ITEMIZED (contributions of more than \$100) (itemize on Schedule A)	TOTAL
A. Candidate's Personal Funds	N/A	100.00	100.00
B. Individual Contributions	4,740.48	7,480.00	12,220.78
C. In-kind contributions	N/A	1,000.00	1,000.00
D. Other Receipts	N/A	N/A	N/A
E. Receipts - Subtotal	4,740.48	8,580.00	13,320.78
F. Loans Rec'd. (Schedule C Sec. 1)	N/A	N/A	0
G. Less Loan Repayments (Schedule C Sec. 2)	N/A	N/A	0
H. TOTAL RECEIPTS	4,740.48	8,580.00	13,320.78
			TOTAL
11 EXPENDITURES (All expenditures must be itemized on Schedule B)			550.00
A. Filing Fee			
B. In-kind Expenditures (itemize on Schedule B)			N/A
C. Other Expenditures (itemize on Schedule B)			9,938.37
D. TOTAL EXPENDITURES (itemize on Schedule B)			10,488.37
12 BALANCE OF CONTRIBUTIONS			0
A. Contributions on Hand (Beginning of Reporting Period)			
B. Total Receipts (10. H. above)			(+) 13,320.78
C. Total Expenditures (11. D. above)			(-) 10,488.37
D. Contributions on Hand (End of Reporting Period)			(-) 1,938.11

13 State the ultimate use of the contributions on hand (12. D. above) To continue campaigning towards November, 1988 General Election.

14 CERTIFICATION: I have examined this report and certify, to the best of my knowledge and belief, it is true, correct, and complete.

7-8-88
(DATE)

Tammy L. Hester
(SIGNATURE)

Tammy L. Hester, Campaign Manager
(Name and Title of Person Preparing this Report)

FOR OFFICE USE ONLY

COMPLETE ☒ INCOMPLETE ☐ ENTERED ☐

JUL 21 1988

RECEIVED

JUL 18 1988
STATE ETHICS
COMMISSION

RECEIVED

JUL 12 1988
STATE ETHICS
COMMISSION

This form will be returned if all items are not properly completed and/or the form not signed.

SEC 4 (Rev. 11-86)

**SCHEDULE A
ITEMIZED RECEIPTS**

Date July 7, 1988
(NAME OF CANDIDATE OR COMMITTEE)

(Contributions from each individual or group of more than \$100) July 7, 1988
(date of report)

(a) DATE OF RECEIPT	(b) NAME OF INDIVIDUAL OR GROUP MAKING CONTRIBUTION	(c) CONTRIBUTION THIS PERIOD	(d) CONTRIBUTIONS TO DATE
3-16-88	Darrell Jackson	100.00	100.00
3-16-88	Bishop A. C. Jackson	500.00	500.00
4-12-88	Sen. Isadore Lourie	150.00	150.00
4-12-88	Citizens For A competitive American	500.00	500.00
4-15-88	Thomas E. Felder	150.00	150.00
4-19-88	Thomas B. McTeer Jr.	100.00	100.00
4-19-88	Nathaniel Spells	100.00	100.00
4-21-88	Phil & Linda Lader	250.00	250.00
4-21-88	Warren (Cubby) Culbertson	100.00	100.00
4-22-88	Attorney General Travis Medlock	250.00	250.00
4-22-88	Attorney Richard Harpootlian	500.00	500.00
4-22-88	Jimmy Bales	100.00	100.00
5-2-88	Attorney Claude Scarborough	150.00	150.00
5-9-88	Rayward Bannister	150.00	150.00
TOTAL (item (c) must equal amount reported in Section 10. E.)		CONTINUED	

**SCHEDULE B
ITEMIZED EXPENDITURES**
(listing of all expenditures)

(a) DATE OF PAYMENT	(b) NAME AND ADDRESS OF PAYEE OR CANDIDATE TO WHOM EXPENDITURES WERE MADE	(c) PURPOSE OF EXPENDITURE	(d) AMOUNT
3-16-88	Richland Co. Democratic Party	Filing Fee	550.00
4-15-88	Velvetix Printers	bumper stickers	330.75
4-15-88	u.s. post office	stamps	62.50
4-20-88	Newton Manu. Company	balloons	50.00
4-22-88	Harbinger Publications	printing	200.00
4-28-88	Brian Costner	photography	73.00
5-2-88	John D. Gorski	art work	365.00
5-3-88	Alice Malavasic	Coord. fee	66.67
5-4-88	Kinko's	Copying	34.38
5-6-88	Newton Manu. Company	Balance on balloons	66.86
5-6-88	Harbinger Publications	Printing	160.00
5-6-88	Cromer's	Air tank	32.43
5-8-88	G&H Mail Service	Mail services	230.00
4-22-88	Harbinger Publications	Printing	220.50
TOTAL (must equal the amount reported in Section 11. D.)			

Additional items may be added if necessary.

NOTE: This form will be returned if all items are not properly completed.

SEC-4 (Rev. 11-80)

23040960050

CONTINUED FROM SCHEDULE A ITEM 3 RECEIPTS

Darrell Jackson
(Name of Candidate)

5- 9-88	Johnson, Toal & Battiste	100.00	100.00
5-11-88	Allen Thames	100.00	100.00
5-11-88	Samuel Tenenbaum	150.00	150.00
5-12-88	Lyles Glenn	150.00	150.00
5-16-88	Luther Lee	100.00	100.00
5-16-88	Jim Hamilton	250.00	250.00
5-23-88	Michael Kelly	100.00	100.00
5-27-88	Rep. Juanita White	100.00	100.00
5-30-88	Johnson's Garbage Services	100.00	100.00
5-30-88	Joseph Ard	250.00	250.00
5-30-88	Jeff Simons	200.00	200.00
5-30-88	Bishop F. C. James	200.00	200.00
5-30-88	Antioch AMEZ Church	200.00	200.00
5-30-88	Rep. Jim Faber	280.00	280.00
6- 1-88	Gergel, Burnette Law Firm	200.00	200.00
6- 8- 88	Det F. Bowers, Jr.	100.00	100.00
6- 8-88	Goldsmith - Theodore Agency	150.00	150.00
6- 8-88	Marvin Chernoff	100.00	100.00
6- 8-88	Boyd C. Hipp, II	150.00	150.00
6- 8-88	Frederick M. Zeigler	150.00	150.00
6-13-88	Hubert E. Yarborough, II	100.00	100.00
6-16-88	Norman J. Arnold	100.00	100.00
7- 6-88	At. Governor Nick Theodore	200.00	200.00
4-29-88	Joseph Lee Jackson	150.00	150.00
4-29-88	Bob Coble	150.00	150.00
4-29-88	Rep. Tim Rogers	200.00	200.00
4-29-88	Attorney Larkin V. Campbell	250.00	250.00
	TOTAL	7,480.00	7,480.00

SCHEDULE B ITEM EXPENDITURES

4-1-88	Herb Segers (Palmetto Post)	Ad	44.00
6-24-88	Roy Wiggins (BIBLEWAY CHURCH DERCON)	Reimbursement for workers	300.00
TOTAL			10,482.37

93040960053

5-12-88	Lyles Glenn	150.00	150.00
5-16-88	Luther Lee	100.00	100.00
5-16-88	Jim Hamilton	250.00	250.00
5-23-88	Michael Kelly	100.00	100.00
5-27-88	Rep. Juanita White	100.00	100.00
5-30-88	Johnson's Garbage Services	100.00	100.00
5-30-88	Joseph Ard	350.00	350.00
5-30-88	Jeff Simons	200.00	200.00
5-30-88	Bishop F. C. James	200.00	200.00
5-30-88	Antioch AMEZ Church	200.00	200.00
5-30-88	Rep. Jim Faber	280.00	280.00
6- 1-88	Gergel, Burnette Law Firm	200.00	200.00
6- 8- 88	Det F. Bowers, Jr.	100.00	100.00
6- 8-88	Goldsmith - Theodore Agency	150.00	150.00
6- 8-88	Marvin Chernoff	100.00	100.00
6- 8-88	Boyd C. Hipp, II	150.00	150.00
6- 8-88	Frederick M. Zeigler	150.00	150.00
6-13-88	Hubert E. Yarborough, II	100.00	100.00
6-16-88	Norman J. Arnold	100.00	100.00
7- 6-88	Lt. Governor Nick Theodore	200.00	200.00
4-29-88	Joseph Lee Jackson	150.00	150.00
4-29-88	Beb Coble	150.00	150.00
4-29-88	Rep. Tim Rogers	200.00	200.00
4-29-88	Attorney Larkin V. Campbell	250.00	250.00
	TOTAL	480.00	7,480.00

The State of South Carolina

CERTIFICATE OF INCORPORATION BY THE SECRETARY OF STATE

VE DEPARTMENT

WHEREAS, Bishop F. C. James, Post Office Box 4837, Columbia, SC
Bishop A. C. Jackson, 2932 Dell Drive, Columbia, SC

two or more of the officers or agents appointed to supervise or manage the affairs of
THE SOUTH CAROLINA COALITION OF BLACK CHURCH LEADERS, INC.

which has been duly and regularly organized, did on the 15th day of
July, A. D. 19 87, file with Secretary of State a written declaration setting forth:

That, at a meeting of the aforesaid organization held pursuant to the by-laws or regulations of the said organization, they
were authorized and directed to apply for incorporation.

That, the said organization holds, or desires to hold property in common for Religious, Educational, Social, Fraternal,
Charitable or other eleemosynary purpose, or any two or more of said purposes, and is not organized for the purpose of profit
or gain to the members, otherwise than is above stated, nor for the insurance of life, health, accident or property; and that three
days' notice in the Star Reporter, a newspaper published in the
County of Richland, has been given that the aforesaid Declaration would be filed.

AND WHEREAS, Said Declarants and Petitioners further declared and affirmed:

FIRST: Their names and residences are as above given.

SECOND: The name of the proposed Corporation is THE SOUTH CAROLINA COALITION OF BLACK CHURCH
LEADERS, INC.

THIRD: The place at which it proposes to have its headquarters or be located is 3700 Forest Drive
(P.O. Box 4837, Columbia) Forest Acres, SC

FOURTH: The purpose of the said proposed Corporation is the purpose of the proposed corporation is to
establish and operate various projects that will promote the social welfare of South Carolina.
The Coalition is organized for the promotion of social welfare, substantially all of its activities
shall be for such purposes, and no part of the net earnings of the corporation shall inure to the
benefit of any member. It is intended that the corporation be organized and operated in such a
manner that it shall qualify as a non-profit corporation within the meaning of section 501(c)(4) of
the Internal Revenue Code of 1986 or the corresponding provision of any future United States
Internal Revenue law.

Notwithstanding any other provision of this Charter, the corporation shall not carry on any other
activities not permitted to be carried on by an organization exempt from federal income tax under
section 501(c)(7) of the Internal Revenue Code of 1986 or the corresponding provision of any future
United States Internal Revenue law.

FIFTH: The names and residences of all Managers, Trustees, Directors or other officers are as follows:

Bishop F. C. James	P. O. Box 4837, Columbia, SC	Director
Rev. S. C. Cureton	2334 Elmwood Ave., Columbia, SC	Director
Bishop A. C. Jackson	2932 Dell Dr., Columbia, SC	Director
Rev. J. O. Rich	2934 Elmwood Ave., Columbia, SC	Director

SIXTH: That they desire to be incorporated: in perpetuity

Now, Therefore, I, JOHN T. CAMPBELL, Secretary of State, by virtue of the authority in me vested, by Chapter
31, Title 33, Code of 1976 and Acts amendatory thereto, do hereby declare the said organization to be a body politic and
corporate, with all the rights, powers, privileges and immunities, and subject to all the limitations and liabilities conferred by
said Chapter 31, Title 33, Code of 1976 and Acts amendatory thereto.

GIVEN under my hand and the seal of the State, at Columbia,

this 15th day of July

in the year of our Lord one thousand nine hundred and

87 and in the two hundred and Twelfth

year of the Independence of the

United States of America.

JOHN T. CAMPBELL,
Secretary of State.

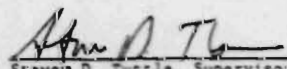
23040960055

93040960056

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

THIS IS TO CERTIFY THAT This and/or the attached is
a true and accurate copy of Certificate of Incorporation
for The South Carolina Coalition of Black Church Leaders, Inc.
recorded in Records of the Secretary of State Corporation
Charter Division, Eleemosynary Charter #23060, 15 July 1987
now on deposit with South Carolina Department of
Archives and History

GIVEN UNDER MY HAND AND THE SEAL OF THE DEPARTMENT
This twentieth day of April, Nineteen Hundred Ninety-two.


Steven D. Tuttle, Supervisor
Reference Services

STATE OF SOUTH CAROLINA
SECRETARY OF STATE
ARTICLES OF INCORPORATION
OF

Sunrise Enterprise of Columbia, Inc.

(File this Form in
Duplicate Originals)

(§33-7-30 of 1976 Code)



This Space for Use
by
Secretary of State

DEC 01/07 1973
66-617665/86-617665 15 30 40 600
17 64 66 144 945 08
SECT OF STATE OF SOUTH CAROLINA

1. The name of the proposed corporation is Sunrise Enterprise of Columbia, Inc.
2. The initial registered office of the corporation is 1111 Belview Street, Suite 103
Columbia Richland S. C. 29204
and the initial registered agent at such address is William J. Chapman
3. The period of duration of the corporation shall be perpetual (perpetual years).
4. The corporation is authorized to issue shares of stock as follows:

Class of Shares	Authorized No. of Each Class	Par Value
<u>Common</u>	<u>100,000</u>	<u>1.00</u>

If shares are divided into two or more classes or if any class of shares is divided into series within a class, the relative rights, preferences, and limitations of the shares of each class, and of each series within a class, are as follows:

Not applicable

5. Total authorized capital stock is 100,000
6. The existence of the corporation shall begin as of the filing date with the Secretary of State or to be effective immediately
7. The number of directors constituting the initial board of directors of the corporation is four (4) and the names and addresses of the persons who are to serve as directors until the first annual meeting of shareholders or until their successors be elected and qualify are as follows:

(a) <u>Howard Bannister</u>	<u>1120 Oconee St., Columbia, S. C. 29201</u>
(b) <u>William J. Chapman</u>	<u>21 Broadmore St., Columbia, S. C. 29203</u>
(c) <u>Darrell Jackson</u>	<u>2936 Dell Drive, Columbia, S. C. 29203</u>
(d) <u>A. C. Jackson</u>	<u>2912 Dell Drive, Columbia, S. C. 29203</u>
8. The general nature of the business for which the corporation is organized is as follows: (It is not necessary to set forth the powers enumerated in §33-1-10 of 1976 Code)

See attached sheet

9. Provisions which the incorporators elect to include in the articles of incorporation are as follows: (Attach additional sheet(s) if necessary)

See attached sheet

8.

- A. To buy, sell, lease, and invest in property, wherever situate and of whatever kind, and to provide any other lawful business and community services.
- B. To clean and provide janitorial services for industrial, commercial and private individuals, construct, fabricate, refurbish, reconstruct, modify, alter, improve, or dismantle buildings and structures of all kinds, to sell at wholesale and retail and otherwise deal in materials and equipment and products, including but not limited to, buildings and homes, and other dwellings, condominiums, apartments of every description and to provide services with respect to the foregoing and to otherwise transact any and all lawful business incidental thereto, associated therewith, or otherwise considered by the corporation to be necessary or desirable.
- C. To purchase, acquire, hold, improve, manage, sell, convey, assign, exchange, encumber, hire, lease, release, mortgage and deal in real and personal property of every kind, description and character.
- To apply for, purchase, or acquire by assignment, transfer or otherwise to hold, mortgage or otherwise pledge, and to sell, exchange, transfer, deal in and with any license power, authority, concession, right of privilege which any corporation may make or grant.
- D. To endorse, lend its credit, or otherwise guarantee, or obligate itself for, or pledge or mortgage all or any part of its properties for the payment of the principle and interest, or either, on any bonds, debentures, notes, coupons, script or other obligations or evidence of indebtedness, or the performance of any contract, mortgage or obligation, of any other corporation, association, domestic, or foreign, or of any person, firm, partnership or joint venture.
- E. To enter into, make and perform contracts of every kind for any lawful purpose without limit as to amount, with any person, firm, association, corporation, municipality, county, state, territory, government, governmental subdivision or body politic.
- F. To acquire the good will, assets, properties and rights, and to undertake the whole or any part of the liabilities of any person, firm, business entity, association or corporation, to pay for the same in cash, the stock or other securities of the corporation, or otherwise; to hold or in any manner dispose of the whole or any part of the businesses, properties, or establishments so acquired and to exercise all the powers necessary or convenient in and about the conduct and lawful management of any such business.
- G. To borrow and lend money, without security, or upon the giving or receipt of such security of the Board of Directors of the corporation may deem advisable by the way of pledge, mortgage, assignment or otherwise, of real and personal property of every nature and description, or by way of guaranty or otherwise.
- H. To enter into any plan or project for the assistance of its employees.
- I. To enter into any lawful arrangement for sharing of profits, union of interest, reciprocal concession or corporation, as partners (general or limited), joint ventures, or otherwise, with any person, partnership, corporation, association combination, organization, entity, or other body whatsoever, domestic or foreign, carrying on or proposing to carry on any business which this organization is authorized to carry on, or any business or transaction deemed necessary, convenient or incidental to the carrying out of any of the objectives of this corporation.
- J. To have one or more offices to carry on all of its operations and business without restriction or limit as to amount, in any states, districts, territories, or possessions or colonies of the United States, and in any and all foreign countries, subject to the law of such state, and in any and all foreign countries, subject to the law of such states, districts, territory, possessions, or country.

- K. To act as jobber, agent or broker in buying, selling and dealing in real and personal property of every nature and description and leases respecting the same and estates and interest therein and mortgages and securities thereon, in making and obtaining loans, whether secured by such property or not, and supervising, managing and protecting such property and loans and all interest in and claims affecting the same.
- 9. Shareholder(s) may enter into an agreement to operate the corporation as if it were a partnership pursuant to Code Section 33-11-220 under the laws of South Carolina.

10. The name and address of each incorporator is as follows:

Name	Street & Box No.	City	County	State
(a) Heyward Bannister	1120 Oconee Street	Columbia	Richland	SC
(b) William J. Chapman	Broadmore Street	Columbia	Richland	SC
(c) Darrell Jackson	2936 Dell Drive	Columbia	Richland	SC
(d) A. C. Jackson	2932 Dell Drive	Columbia	Richland	SC

Heyward Bannister
Signature of Incorporator
William J. Chapman
Signature of Incorporator
Darrell Jackson
Signature of Incorporator
A. C. Jackson
Signature of Incorporator

Heyward Bannister
Type or Print Name
William J. Chapman
Type or Print Name
Darrell Jackson
Type or Print Name
A. C. Jackson
Type or Print Name

Date: December 4, 1986

STATE OF South Carolina

COUNTY OF Richland

The undersigned Heyward Bannister, William J. Chapman, Darrell Jackson & A. C. Jackson

do hereby certify that they are the incorporators of Sunrise Enterprise of Columbia, Inc. Corporation and are authorized to execute this verification; that each of the undersigned does hereby certify that he or she has read the foregoing document, understands the meaning and purport of the statements therein contained and the same are true to the best of his or her information and belief.

Heyward Bannister
Signature of Incorporator
William J. Chapman
Signature of Incorporator

Darrell Jackson
Signature of Incorporator
A. C. Jackson
Signature of Incorporator

CERTIFICATE OF ATTORNEY

Law Offices of E. W. Cromartie

I, By: Susan G. Williams, an attorney licensed to practice in the State of South Carolina, certify that the corporation, to whose articles of incorporation this certificate is attached, has complied with the requirements of Chapter 7 of Title 33 of the Code of Laws of South Carolina (1976) relating to the organization of corporations, and that in my opinion, the corporation is organized for a lawful purpose.

Date: December 4, 1986

Law Offices of E. W. Cromartie

By: Susan G. Williams
Signature

Susan G. Williams, Esquire
Type or Print Name

P. O. Box 8417, 1926 Hampton Street
Address

Columbia, S. C. 29202
City State Zip

SCHEDULE OF FEES

(Payable at time of filing Articles with Secretary of State)

Fee for Filing Articles

\$ 3.00

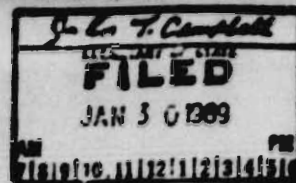
In addition to the above, \$ 40 for each \$1,000.00 of the aggregate value of shares which the corporation is authorized to issue, but in no case less than

40.00
1,000.00

NOTE THIS FORM MUST BE COMPLETED IN ITS ENTIRETY BEFORE IT WILL BE ACCEPTED FOR FILING. THIS FORM MUST BE ACCOMPANIED BY THE FIRST REPORT OF CORPORATIONS AND A CHECK IN THE AMOUNT OF \$100 PAYABLE TO THE SOUTH CAROLINA TAX COMMISSION.

8617665

STATE OF SOUTH CAROLINA
SECRETARY OF STATE



NOTICE OF CHANGE OF REGISTERED OFFICE
OR REGISTERED AGENT OR BOTH
OF A SOUTH CAROLINA
OR FOREIGN CORPORATION

JAN 01/02 4973
87-001466/87-001466 00-45-00 012
01-20-89 FWT 016.00
SECT OF STATE OF SOUTH CAROLINA

Pursuant to §§33-5-102 and 33-15-106 of the 1976 South Carolina Code, as amended, the under-
signed corporation submits the following information.

1. The name of the corporation is Sunrise Enterprise of Columbia, Inc.
2. The corporation is (complete either a or b, whichever is applicable):
 - a. a domestic corporation incorporated in South Carolina on Dec. 4, 1986; or
 - b. a foreign corporation incorporated in _____ on _____, and
(State) (Date)
authorized to do business in South Carolina on _____
(Date)
3. The street address of the current registered office in South Carolina is 1107 Bellevue St.
(Street & Number)
in the city of Columbia, South Carolina 29201
(Zip Code)
4. If the current registered office is to be changed, the street address to which its registered office
is to be changed is _____ in the city of _____ South Carolina _____
(Street & Number) (Zip Code)
5. The name of the present registered agent is William J. Chapman
6. If the current registered agent is to be changed, the name of the successor registered agent is
Howard Bannister
*I hereby consent to the appointment as registered agent of the corporation:

Howard Bannister
(Signature of New Registered Agent)

7. The address of the registered office and the address of the business office of the registered agent,
as changed, will be identical.
8. Unless a delayed date is specified, this application will be effective upon acceptance for filing
by the Secretary of State (See §33-1-230(b)): _____

* Pursuant to §§33-9-102(5) and 33-19-106(5), the written consent of the registered agent may be
attached to this form.

4. Credit Carryover (line 1 less line 3) _____

SCHEDULE D

ANNUAL REPORT TO BE COMPLETED BY ALL CORPORATIONS

1. Incorporated under the Laws of the State of SOUTH CAROLINA on DECEMBER 4, 1986
2. If Foreign Corporation, the date qualified to do business in the State of South Carolina is N/A
3. Location of the Registered Office of the Corporation in the State of South Carolina is 1215 ANTHONY AVE in the City of COLUMBIA
Registered Agent at such address is HEYWARD BANNISTER
4. Was the name of the Corporation changed during the year? NO Give old name N/A
5. Date commenced business in the state of South Carolina was DECEMBER 4, 1986
6. Location of principal office in S.C. 1215 ANTHONY AVE. COLUMBIA, SC 29201
Nature of principal business in S.C. JANITORIAL SERVICES/CONSULTING SERVICES
7. The Corporation's books are in the care of _____
Located at _____
8. If Foreign Corporation, have all changes in structure since the filing of the last Annual Report been reported to the Secretary of State, in South Carolina? N/A
9. If filing consolidated, complete and attach Schedule J listing name, address and affiliation of all Corporations.
10. If a professional corporation are all shareholders, one-half of the directors and all officers (other than the secretary and treasurer) qualified to practice the professional services engaged in by the corporation? N/A
11. The total number of authorized shares of capital stock itemized by class and series, if any, within each class is as follows:
- | Number of Shares | Class | Series |
|------------------|--------|--------|
| 100,000 | COMMON | |
12. The total number of issued and outstanding shares of capital stock itemized by class and series, if any, within each class is as follows:
- | Number of Shares | Class | Series |
|------------------|--------|--------|
| 10,000 | COMMON | |
13. The total amount of stated capital per balance sheet is:
- | | | |
|--------------------------------|----|--|
| Total paid in Capital Stock | \$ | |
| Total paid in Capital Surplus | \$ | |
| Total amount of stated Capital | \$ | |
14. The names and business addresses of the directors (or individuals functioning as directors) and principal officers in the Corporation are:
(If additional space is necessary, attach separate schedule.)

NAME

BUSINESS ADDRESS AND OFFICE

BISHOP A.C. JACKSON	2932 DELL DRIVE COLUMBIA, SC 29209
HEYWARD BANNISTER	1215 ANTHONY AVE. COLUMBIA, SC 29201
DARRELL JACKSON	1215 ANTHONY AVE. COLUMBIA, SC 29201

Surprise Enterprise of Cola 90/91

1. Incorporated under the Laws of the State of South Carolina on December 4, 1986
2. If Foreign Corporation, the date qualified to do business in the State of South Carolina is N/A
3. Location of the Registered Office of the Corporation in the State of South Carolina is 1215 Anthony Ave in the City of Columbia
Registered Agent at such address is Heyward Bannister
4. Was the name of the Corporation changed during the year? No Give old name N/A
5. Date commenced business in the state of South Carolina was December 4, 1986
6. Location of principal office in S.C. 1215 Anthony Avenue, Columbia, SC 29201
Nature of principal business in S.C. Janitorial Services
7. The Corporation's books are in the care of [REDACTED]
Located at [REDACTED]
8. If Foreign Corporation, have all changes in structure since the filing of the last Annual Report been reported to the Secretary of State, in South Carolina? N/A
9. If filing consolidated, complete and attach Schedule J listing name, address and affiliation of all Corporations.
10. If a professional corporation are all shareholders, one-half of the directors and all officers (other than the secretary and treasurer) qualified to practice the professional services engaged in by the corporation? N/A
11. The total number of authorized shares of capital stock itemized by class and series, if any, within each class is as follows:

Number of Shares	Class	Series
100,000	Common	

12. The total number of issued and outstanding shares of capital stock itemized by class and series, if any, within each class is as follows:
- | Number of Shares | Class | Series |
|------------------|--------|--------|
| 10,000 | Common | |

13. The total amount of stated capital per balance sheet is:

Total paid in Capital Stock	\$ <u>[REDACTED]</u>
Total paid in Capital Surplus	\$ <u>[REDACTED]</u>
Total amount of stated Capital	\$ <u>[REDACTED]</u>

14. The names and business addresses of the directors (or individuals functioning as directors) and principal officers in the Corporation are:
(If additional space is necessary, attach separate schedule.)

NAME

BUSINESS ADDRESS AND OFFICE

<u>Bishop A.C. Jackson</u>	<u>2932 Dell Drive, Columbia, SC 29209</u>
<u>Heyward Bannister</u>	<u>1215 Anthony Ave., Columbia, SC 29201</u>
<u>Darrell Jackson</u>	<u>1215 Anthony Ave., Columbia, SC 29201</u>

*Sunrise Enterprise
of Columbia of S.C*

89/90

*91-2173 In 4th Circuit
Court of Appeals*

Please Note:

- (1) Bishop Jackson is the pastor of the Bible way Church of Atlas rd.
- (2) Darrel Jackson is the pastors assistant at the Bibleway Church of atlas rd.
- (3) The above are also either co-chairpersons and or directors of Coalition of Black Churches
- (4) The above are also co-chairpersons of the project ADAM, an anti drug program/organization, non-profit, which uses Black churches leaders as its core. This organization is believed to be used as a political tool.

(Please note that the Bible way Church is a national organization with bishop serving on the Board of Bishops.)

Cable Box 34

Various	Harbinger Publications Columbia, SC	Printing	1,181.75
4/2/90	Katheryn Haskell Columbia, SC	Refund	125.00
3/12/90	Jaco's Columbia, SC	Refreshments	50.25
Various	Kingfisher Productions Columbia, SC	Media production	4,915.00
Various	Kinko's Columbia, SC	Printing	464.10
Various	Judie Miller Columbia, SC	Consulting fee; reimbursement	9,681.17
3/13/90	Office Warehouse Columbia, SC	Supplies	122.68
4/11/90	Omega Psi Phi Columbia, SC	Advertisement	200.00
4/27/90	Pickles Associates Columbia, SC	Copying	6.48
Various	Lois Pope Columbia, SC	Reimbursement for postage	280.17
3/6/90	St. Patrick's Celebration Columbia, SC	Parade entrance fee	25.00
4/6/90	Nancy Sandel Columbia, SC	Refreshments	63.38
4/27/90	Shandon Neighborhood Council; Columbia, SC	Advertisement	40.00
Various	Southern Bell Columbia, SC	Telephone service	953.83
Various	Southern National Bank Columbia, SC	Check printed; bank service charges	124.58
(Various	Sunrise Enterprises, Inc. Columbia, SC	Consulting fee; media fees, rein- bursement for expenses	27,356.98
Various	Taylor Street Copy Center Columbia, SC	Printing	1,522.78
1/3/90	Town House Columbia, SC	Reception	1,200.00
Various	U.S. Postmaster Columbia, SC	Postage	11,462.07

60175.22

93040960064

www.ck12.org

TOTAL the amount reported in Section 10.0.

Cable Box

SCM PAC, Columbia (James Murphy)	5/10/90	250
	6/11/90	100
Bernice Scott, Gadsden	5/31/90	50
Mary Scott, Columbia	6/10/90	20
Peter Sercer, Columbia	6/11/90	100
M/M Andy Shlon, Columbia	5/30/90	50
Kelly Shuptrine, Columbia	5/30/90	50
Warren Sipple, Columbia	5/30/90	10
W.M. Skinner, Columbia	6/11/90	100
M/M Gerald Smith, Columbia	5/30/90	100
J. Emory Smith, Jr., Columbia	5/30/90	25
SOC PAC, Columbia (Wm. Mahon)	6/11/90	100
M/M Robert Sollee, Columbia	5/30/90	25
Southbridge Properties, Inc., Cola. (Wayne Smith)	6/11/90	100
Southeastern Concrete Products Co., Cayce-W. Cola. (C.A. Carson)	6/11/90	100
Southwinds, Ltd., Columbia (Ed Bagwell)	6/22/90	750
Sovereign Homes, Cola. (Gary Taylor)	6/11/90	100
Sunrise Enterprise of Cola., Cola. (Darrell Jackson & Hayward Bannister)	6/11/90	500
H. K. Steele Sand Co., Inc., W. Cola.	6/11/90	100
R. Gerald Steele, Columbia	6/11/90	100
Dr. & Mrs. John Stine, Columbia	5/30/90	50
W. J. Stubbs, Jr., Columbia	6/10/90	100
April Lucas & John Stacker, Columbia	5/30/90	100
Sunrise Enterprise of Columbia, Inc., (Darrell Jackson & Hayward Bannister)	6/14/90	500
M/M J. Sanders Tate, Columbia	6/10/90	25

3505

Robert L. Sunwalt, III
Columbia, SC

4/13/90

50

Cable B. b
28

Sunrise Enterprise of Cola., Inc. 9/26/89
Columbia, SC (Darrell Jackson)

100

M/M Joseph Surface
Columbia, SC

3/26/90

3/30/90

25

~~25~~

Swerling & Harpootlian
Columbia, SC (Jack Swerling)

9/29/89

100

Jack Swerling
Columbia, SC

3/29/90

500

Raven Graydon Tarpley
Columbia, SC

11/5/89

25

J. Sanders Tate
Columbia, SC

2/2/90

25

Bernard C. Taylor
Columbia, SC

3/14/90

10

John Tecklenburg
Charleston, SC

4/1/90

100

Henry Tecklenburg
Charleston, SC

4/20/90

500

Samuel Tenenbaum
Lexington, SC

3/24/89

12/8/89

3/13/90

150

200

~~100~~

Charles L.A. Tennant
Columbia, SC

1/31/90

25

D. Allen Thames
Columbia, SC

2/13/90

50

Robert J. Thomas, Jr.
Columbia, SC

3/1/90

25

Sidney Thomas, Jr.
Columbia, SC

3/13/90

40

Elliot Thomas
Columbia, SC

2/3/90

3/19/90

500

~~500~~

M/M Arthur B. Tiemann
Columbia, SC

3/7/90

25

John L.M. Tobias
Columbia, SC

3/4/90

100

Mrs. E. Hickson Tomlinson
Columbia, SC

2/9/90

25

4500



INVOICE#

0487

DATE

4-26-91

CLIENT:

Sunrise Enterprise

ATTENTION:

Darryl Jackson

JOB DESCRIPTION:

Livola Taylor Mailer

received
5-15-91

ITEMIZED SERVICES

AMOUNT

Printing of 3500 mailers

\$498.00

DISCOUNTED
FINAL PRICE

received
5-15-91

425.00

Terms: If payment in full is not received by DUE DATE, the unpaid balance will be subject to a FINANCE CHARGE of 1.5% per month (18% per year). Any legal fees incurred in the collection of this invoice, shall be paid by the client named on this invoice. Further use of these designs are contingent upon the permission or purchase of rights from PASTEL DESIGN GROUP. Approval of copy and image materials during production, as well as final job proofing, is the responsibility of the client. Subsequent changes (additions/deletions/modifications) shall be considered AC (Author's Change), and shall be billed to the client accordingly. Corrections made by PASTEL DESIGN GROUP shall be considered OC (Our Change) and shall be credited as such. Estimates are subject to change with prior notification.

GRAPHICS

PRINTING

TOTAL

DATE DUE

DEPOSIT

BALANCE

2412 Beltline Boulevard, Columbia, S.C. 29204, 803 737-4988, Fax 803 737-4891

HOUSE ETHICS
COMMITTEE

NELSON, MULLINS, RILEY & SCARBOROUGH

ATTORNEYS AND COUNSELORS AT LAW
IN PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS

September 5, 1991

CLAUDE M. SCARBOROUGH, JR.
RICHARD W. RILEY
EDWARD W. MULLINS, JR.
WILLIAM B. NELSON, II
R. BRUCE SHAW
JOHN L. BELL, III
WILLIAM S. DAVIES, JR.
DONALD H. STUBBS
ROBERT M. ERWIN, JR.
JAMES C. BLAKELY, JR.
RALSTON B. VANZANT, II
WILLIAM O. SWEENEY, III
STEPHEN G. MORRISON
EDWARD E. POLIAKOFF
JOHN C. STEWART, JR.
BRENTON D. JEFFCOAT
SHERYL CUDD BLUMS
THORNWELL F. SOWELL
JOHN T. MOORE
GEORGE S. BAILEY
JOHN M. CAMPBELL, JR.
RICHARD B. WATSON
WILLIAM C. HUBBARD
DWAYNE F. DRAKE
GEORGE B. WOLFE
HENRY S. KNIGHT, JR.

KENNETH E. YOUNG
JAMES C. GRAY, JR.
NINA NELSON SMITH
CHARLES R. MORRIS
J. DOUGLAS KUNN, JR.
RICHARD H. WILLIS
JOEL H. SMITH
DAVID G. TRAYLOR, JR.
MONTEITH P. TODD
L. SIDNEY CONNOR, IV
ROBERT W. FOSTER, JR.
REBECCA LAFFITTE
DAVID E. DUKES
ARTHUR L. COLEMAN
L. WALTER TOLLISON, III
JOHN S. EGAN
DAVID T. MONTEITH
GEORGE B. CAUTHEN
TIMOTHY D. SCRANTON
BARBARA HOWE HEARTHUR
KENNETH ALLAN JANIK
USA D. CATT
CHRISTOPHER J. DANIELS
GEORGE K. LYALL
RICHARD A. FARRER
NANCY BYNUM RILEY

JANE THOMPSON DAVIS
JOHN E. SCHMIDT, III
STUART M. ANDREWS, JR.
CAROLYN CASON MATTHEWS
W. THOMAS CAUSBY
LAURA S. CAMPBELL
ROYANN RUSS MURRAY
DEBORAH WILLIAMSON WITT
SUSAN C. PARQUE
RUSSELL Z. FLOWGEN
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DAVID E. HODGE
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HOWARD A. VANQINE, III
GRADY L. BEARD
PATRICK F. O'DEA
THOMAS F. NORMAN
D. VANESSA STONER
J. CALHOUN WATSON
PHILLIP LUKE MUIHES
J. MARK JONES
CHERRIE L. NELSON

JOSEPH M. MELCHERS
ROBERT M. BRUNSON
KENNETH W. MARRELL
LINDA HOHLERBUCK RUNGE
KAREN HUDSON THOMAS
AUGUSTUS M. DIXON
JULIE JEFFORDS-MOORE
STEPHEN R. M. LEWIS
JEANNE M. NYSTROM
A. MARVIN DUATTEBAUM, JR.
JAMES F. ROGERS
DENHAM RUSH SMITH, III
AMY C. HENDRIX
ELIZABETH SCOTT MOISE
BARBARA E. BRUNSON
DANIEL J. WESTBROOK
JOHN F. RUPPENS
EDWIN LAKE TURNAGE
C. RITCHIE BROWN
W. CLIFTON SCOTT
JEFFREY A. JACOBS
GEORGE T. GREGORY, III
ANGUS H. MACAULAY, JR.
JANE HUNT HARRIS
LAURA E. ZOOKE
SUSAN M. GLENN

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241 OAS STREET
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TELECOPY (803) 448-3437

COLUMBIA REPLY TELEPHONE

IN PROFESSIONAL ASSOCIATION

ROBERT E. LEE GARNER
J. CHRISTOPHER HENDERSON
EDWARD P. RILEY, SR.
EDWARD P. RILEY, JR.
ROBERT P. MULLINS
JOHN S. WILLIAMS, JR.
OF COUNSEL

PATRICK HENRY NELSON (803) 799-2000
WILLIAM S. DAVIES, JR. (803) 799-2000
PATRICK H. NELSON (803) 799-2000
P. BARBARA GRIEN, JR. (803) 799-2000
EDWARD W. MULLINS, SR. (803) 799-2000

Ms. Levola Taylor
Post Office Box 3076
Columbia, SC 29230

Dear Levola:

Nelson, Mullins, Riley and Scarborough is pleased to make the enclosed \$250 contribution to your campaign account.

Yours very truly,

NELSON, MULLINS, RILEY & SCARBOROUGH

By:

Claude M. Scarborough, Jr.

CMSjr:jc
Enclosure

cc: I. S. Leevy Johnson

RECEIVED

HOUSE ETHICS
COMMITTEE

7/24/91
(Date of Report)

TOTAL (Item (c) must equal amount reported in Section 10, F.)[illegible]

Jones

(1)

Churches

- 4-7-91 - St Mark Bpt. Church, P.O. Box
Gadsden, S.C, 29052 - \$ 15.00
- 4-7-91 - Pleasant Grove Bpt. P.O. Box
Gadsden, S.C 29052 - \$ 10.00
- 4-9-91 - Unity Evangelistic, P.O. Box
Eastover, S.C. 29044 - \$ 20.00
- 4-13-91 - St Phillip AME, P.O. Box
Eastover S.C, 29044 \$ 5.00
- 4-18-91 - Antioch AME Z, Antioch Church
Rd. Eastover, S.C. 29044 \$ 50.00
- 4-19-91 - Rock Hill AME, P.O. Box
Hopkins, S.C, 29061 - \$ 5.00
- 4-28-91 Shiloah AME, P.O. Box
Eastover, S.C. 29044 \$ 5.00
- 4-28-91 - Daughters of Zion Bpt, 1115
Oldm^egraw Rd. Eastover, S.C. 29044 \$ 5.00
- 4-28-91 - Mt Morriah Bpt, Rte 1, Box
174 Hopkins, S.C. 29061 - \$ 10.00
- 5-5-91 Ladson's Chapel, Rte 1, Box
360, Hopkins, S.C. 29061 - \$ 5.00

TOTAL \$ 130.00

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Churches

5-19-91	Antioch AMEZ Church	\$10.00
"	Pleasant Grove Baptist Church	5.00
5-26-91	St. Mark Church	5.00
"	St. John Baptist Church	10.00
6-1-91	Jerusalem Baptist Church	25.00
6-2-91	Goodwill Baptist Church	10.00
6-15-91	New Light Buleah Church	10.00
6-12-91	Rev. A.B. Chavis Church	25.00
6-15-91	St. Matthews Baptist Church	10.00
6-16-91	Zion Benevolent Church	10.00
6-24-91	Antioch AMEZ Church	24.00
7-7-91	Antioch AMEZ church	24.00
7-15-91	St. Luke AME Church	25.00
		\$193.00

RECEIVED

JUL 25 1991

HOUSE ETHICS
COMMITTEE

PRECINCTS GET OUT THE VOTE

6-26-91	Robert C. Williams	\$ 35.00
"	Charlie P. Williams	\$ 35.00
"	Rev. Layford Johnson	\$ 35.00
"	Willie Floyd	35.00
"	Alice Scott	35.00
"	Rev. Richard Robinson	35.00
"	Robert Jacobs	35.00
"	Celley Weston	35.00
"	Beatrice Scott	35.00
6/27/91	Catherine Jackson	35.00
6/27/91	Diane Floyd	35.00
"	Alberta Middleton	35.00
"	Ernestine Alston	50.00
6-28-91	Rebecca Cohens	35.00
"	Laura Jefferson	60.00
6-29-91	Sallie Gibson	35.00
"	Clouise Watson	35.00
		<u>\$ 635.00</u>

RECEIVED

JUL 25 1991

HOUSE ETHICS
COMMITTEE

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

ROBERT LEE WILLIAMS,

Plaintiff,

vs.

CIVIL ACTION NO. 3:90-1424-OH

ORIGINAL FILED

JUN 26 1991

AND R. BIRCH, CLERK
COLUMBIA, S. C.

93040960074

C. ERROL CATOE, Individually)
and as Executive Director of)
the South Carolina Licensing)
Board for Contractors; HARRY)
KENT, Individually and as)
Vice-Chairman of the South)
Carolina Licensing Board for)
Contractors; WALTER HUNTER,)
Individually and as a Board)
Member of the South Carolina)
Licensing Board for)
Contractors; GARY SHELTON,)
Individually and as a Board)
Member of the South Carolina)
Licensing Board for)
Contractors; JOHN T. WATKINS,)
Individually and as Director)
of the Home Builders)
Commission of South Carolina;)
ALICE C. BROADWATER,)
Individually and as Assistant)
Attorney General in charge of)
Civil Litigation for South)
Carolina; GEORGE K. LYALL;)
NINA NELSON SMITH; and MELODY)
RENEE BLACK, Individually and)
as Attorneys for Nelson,)
Mullins, Riley and Scarborough)
Law Firm; EDWARD MULLINS, JR.,)
Individually and as Partner)
and Attorney for Nelson,)
Mullins, Riley and)
Scarborough Law Firm; NELSON,)
MULLINS, RILEY AND)
SCARBOROUGH, Counselors and)
Attorneys at Law; C. VICTOR)
FLYE, JR., Individually and as)
Judge for the State of South)
Carolina; ROBERT SMALL, JR.,)
Individually and as owner of)
Avtex Properties, Inc./Avtex)
Construction Company; ALAN)
HARDIN, Individually and as)
Construction Manager for Avtex)
Properties, Inc./Avtex)

93040960075

Construction Company; JAMES E.)
KNIGHT, JR., Individually and)
as Attorney for the Law)
Offices of James E. Knight,)
Jr.; THE LAW OFFICES OF)
JAMES E. KNIGHT, JR.,)
MICHAEL A. PULLIAM,)
Individually and in his)
capacity as Attorney for)
Richardson, Plowden, Grier and)
Howser Counselors and)
Attorneys at Law; RICHARDSON,)
PLOWDEN, GRIER and HOWSER)
Counselors and Attorneys at)
Law; JERRY D. SANDERS,)
Individually and as Agent for)
Maryland Casualty Company;)
and MARYLAND CASUALTY COMPANY,)
Defendants.)

NOTICE OF APPEAL

Notice is hereby given that the plaintiff Robert Lee Williams appeals to the United States Court of Appeals for the Fourth Circuit from the Order granting the defendant's Motion for Summary Judgment, to grant leave to amend complaint or in the alternative to remand case to lower court with instructions to grant leave to amend and to obtain legal counsel, and to repeal \$1,000.00 fee imposed, entered in this action on the 26th day of June, 1991.

Respectfully submitted,

Robert Lee Williams

ROBERT LEE WILLIAMS
Representative for the
Plaintiff (PRO SE)
104 McNeely Road
Columbia, SC 29223
(803) 788-5494 (After 5:30 pm)
(803) 748-3254 (8:30 am to 5:00 pm)

A TKL: CDR

Attest: Ann A. Birch, Clerk

By: *Ann A. Birch*
Deputy Clerk

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

ROBERT LEE WILLIAMS,

Plaintiff,

vs.

CIVIL ACTION NO. 3:90-1424-

93040960076
C. ERROL CATOE, Individually)
and as Executive Director of)
the South Carolina Licensing)
Board for Contractors; HARRY)
KENT, Individually and as)
Vice-Chairman of the South)
Carolina Licensing Board for)
Contractors; WALTER HUNTER,)
Individually and as a Board)
Member of the South Carolina)
Licensing Board for)
Contractors; GARY SHELTON,)
Individually and as a Board)
Member of the South Carolina)
Licensing Board for)
Contractors; JOHN T. WATKINS,)
Individually and as Director)
of the Home Builders)
Commission of South Carolina;)
ALICE C. BROADWATER,)
Individually and as Assistant)
Attorney General in charge of)
Civil Litigation for South)
Carolina; GEORGE K. LYALL;)
NINA NELSON SMITH; and MELODY)
RENEE BLACK, Individually and)
as Attorneys for Nelson,)
Mullins, Riley and Scarborough)
Law Firm; EDWARD MULLINS, JR.,)
Individually and as Partner)
and Attorney for Nelson,)
Mullins, Riley and)
Scarborough Law Firm; NELSON,)
MULLINS, RILEY AND)
SCARBOROUGH, Counselors and)
Attorneys at Law; C. VICTOR)
PLYE, JR., Individually and as)
Judge for the State of South)
Carolina; ROBERT SMALL, JR.,)
Individually and as owner of)
Avtex Properties, Inc./Avtex)

Construction Company; ALAN)
 HARDIN, Individually and as)
 Construction Manager for Avtex)
 Properties, Inc./Avtex)
 Construction Company; JAMES E.)
 KNIGHT, JR., Individually and)
 as Attorney for the Law)
 Offices of James E. Knight,)
 Jr.; THE LAW OFFICES OF)
 JAMES E. KNIGHT, JR.,)
 MICHAEL A. PULLIAM,)
 Individually and in his)
 capacity as Attorney for)
 Richardson, Plowden, Grier and)
 Howser Counselors and)
 Attorneys at Law; RICHARDSON,)
 PLOWDEN, GRIER and HOWSER)
 Counselors and Attorneys at)
 Law; JERRY D. SANDERS,)
 Individually and as Agent for)
 Maryland Casualty Company;)
 and MARYLAND CASUALTY COMPANY,)
)
 Defendants.)

APPEAL

The plaintiff respectively submits that his complaint should not have been dismissed by the District Court for failure to state a claim unless it appeared to be an absolute legal certainty the plaintiff was not entitled to relief, including injunctive relief, under any set of facts he could prove by way of an amended complaint. The plaintiff therefore, submits that the entire basis for the Court's decision to dismiss his case was premised on error. All of the elements that the Court said was missing from the plaintiff's case were present in some form of pleading filed in this case. (See the attachments.)

The plaintiff respectively submits, and with the highest degree of respect to and love for Magis ... Gambrell,

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that maybe Magistrate Gambrell abrogated his duty to remain impartial by becoming associated with a defensive posture in the case at hand. It appears that Magistrate Gambrell should have revealed to the Court that his son, Charles W. Gambrell, Jr., is the Chief Assistant Attorney General for the State of South Carolina working out of the Government and Civil Litigation Division. It would also appear that Magistrate Gambrell should have revealed to the Court any other present association with the Attorney General or his office, and with any of the other law firms or others involved in this case, if such associations would have impeded his ability to remain impartial.

The plaintiff further submits that it appears that Magistrate Gambrell may have mis-used his official position as a Magistrate to impose an undue influence upon him in order to influence his position on how to proceed. That the Honorable Magistrate in his Recommendation to the Court, page 10 beginning at line 3, states that the plaintiff's complaint contains "... lengthy factual allegations...", but includes a copy of Rule 11 (Sanctions) with his Order dated July 20, 1990. This Order was precipitated by the State defendants Catoe, Kent, Hunter, Shelton, Watkins, Broadwater, and Pyle by way of a Motion to Enlarge Time. No other answers or Motions to Dismiss had been filed by any of the defendants before this Order, and it appears that the entire defensive strategy of all the defendants may have been developed from this Order. From what the plaintiff can determine, every case cited by the Honorable Magistrate Gambrell to justify the imposition of Rule 11 Sanctions

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dealt with attorneys. The Honorable Magistrate Gambrell appears to not have had the authority to sanction nor impose attorney fees, nor suggest to the plaintiff that he should have signed Stipulation of Dismissal to relieve him of Rule 11 Sanctions and attorney fees. (See attachments, plus pages 7 to 10 and the first paragraph of page 11 of the Court Order.) Please observe especially the section of this Order on pages 9 and 10 where it states: "... Supreme Court has cautioned that 'Rule 11 is not a fee shifting statute.... A movant under Rule 11 has no entitlement to fee or any other sanction.'" Couter & Gell. Nor does Rule 11 create a federal common law of malicious prosecution. Id. "The main standard contained in Rule 11 requires the signer to make "reasonable inquiry" into both the factual assertions stated in a pleading motion, together with the legal premise upon which it is based."

The plaintiff respectively submits that the misplacing of his Motion to Amend his Complaint filed on October 10, 1990 by the Honorable Magistrate Gambrell may have led to the Court's error in dismissing his case. Commencing at the last paragraph of page 5 of the Court's Order, it states: "Plaintiff next complains that at page 6, note 7, the Magistrate Judge noted that a Motion to Amend the Complaint "went unnoticed until recently" and he argues that the overlooking of his Motion to Amend has prejudiced his right to properly present his case. Plaintiff does not state the manner in which he was prejudiced. Indeed, it appears that the Magistrate Judge considered the amended complaint even though he observed that "it went unnoticed until recently." The plaintiff

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politely points out to the Court that it was not possible for the Magistrate Judge to consider his amended complaint in his Recommendation to the Court even though he observed that "it went unnoticed until recently", since the plaintiff never filed an amended complaint but only a Motion to Take Leave and Amend Complaint. It would appear that the Court would have freely granted the plaintiff the opportunity to try and amend his complaint even if it denied him, through the Honorable Magistrate Gambrell, the opportunity to engage licensed counsel to continue his case when it was determined by the plaintiff's physician, Dr. Greene B. Neal, Cardiology and Internal Medicine, that he was medically unfit, both physically and psychologically, to continue in and grasp the complex nature of the case, because he had developed temporary states of amnesia which was either a side effect of the psychological medication he was taking for depression and anxiety or a combination of all medications for various ailments, including malignant hypertension, vascular spasms, the most severe form of migraine headaches, prostate gland and degenerated arthritis. (See especially the attached letter to the Honorable Magistrate dated September 14, 1990. See also a list of the plaintiff's various medications, his medical history from Dr. Neal and various other reports from hospitals and specialists which were filed with his complaint.)

The plaintiff additionally submits that earlier references to having his complaint amended was made on September 20, 1990, October 1, 1990 and October 9, 1990. (See second paragraph of page

2 and last paragraph of page 4 of Plaintiff's Response to Defendants, Catoe, Kent, Hunter, Shelton, Watkins, Broadwater, et al., Motion to Dismiss; Plaintiff's Response to Motion to Dismiss by Jerry D. Sanders and Maryland Casualty Company; undated letter to Judge Gambrell, hand delivered October 9, 1990.)

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The plaintiff would, moreover, respectfully submit to the Court that the Honorable Magistrate Gambrell, considering the plaintiff's physical and psychological problems aforementioned should "not have suggested on several occasions that he sign Stipulation of Dismissal of Defendants Michael J. William and Richardson, Plowden, Grier and Howser, particularly when it clearly stated on their stationary letterhead that they operate or have membership in bars in at least Virginia and Florida, in order to avoid imposition of Rule 11 Sanctions and attorney fees. The plaintiff signed Stipulation on October 19, 1990. It appears to the plaintiff that the Court could have dismissed the case prior to suggesting to him to sign Stipulation if his case did not have merit. (See attachments.)

The plaintiff respectfully challenges and contends that the Honorable Magistrate Gambrell and the Court subsequently erred by allowing Jerry D. Sanders and the Maryland Casualty Company to file a Motion to Dismiss pursuant to Rule 12(b)(6) some 50 or so days after filing their answer without any request to the Court to enlarge time. The plaintiff, from what he can determine from the various Orders issued by the Honorable Magistrate Gambrell, excluding this particular Motion, was allowed between 17 and 20

be rushed to Richland Memorial Hospital. (See attachment from Richland Memorial Hospital as well as other attachments.)

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The plaintiff respectively submits that the defendants Lyall, Smith, Black, Mullins and Nelson, Mullins, Riley and Scarborough manufactured and assisted others in the manufacturing of evidence which amounts to a criminal offense and subjects the manufacture to contempt powers of the Court. (See attachments.) The plaintiff further submits that Nelson, Mullins, Riley and Scarborough, Counselors and Attorneys at Law, may have more than a lawyer-client relationship with Avtex and its two agents, Robert S. Small, Jr., and Alan Hardin. There appears to exist a financial relationship with at least Attorney Dennis C. Gilchrist, PA, of this firm, and Avtex and its representatives. From what can be determined from certified copies of Articles of Incorporation, Avtex Properties, Inc., was derived from D. C. G. of Greenville, Inc. D. C. G. is believed to stand for Dennis G. Gilchrist, the incorporator, initial registered agent and initial board of director of same. With this appearing to be the case, and in light of the fact that former Governor Richard W. Riley, a partner in the law firm of Nelson, Mullins, Riley and Scarborough, appointed all of the Contractors' Board and Residential Home Builders Commissioners (except one) cited in his complaint, their representation of Avtex and unjustifiable civil abuse of the plaintiff, and consequently his family, before the Board and Circuit Court, was unlawful and should have been investigated by the Attorney General of South Carolina, who was repeatedly made

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aware of public corruption infractions. (See certified copies of Articles of Incorporation showing derivation of Avtex Properties Inc., from D. C. G. of Greenville, Inc., plus other related Articles of Incorporation of other Avtex or associated companies, as well as stationary letterheads of Nelson, Mullins, Riley and Scarborough.)

The plaintiff submits that Avtex Properties, Inc., Avtex Construction Company, and Avtex Commercial Properties, Inc., belongs to a national corporation, C. T. Corporation System, registered agent, out of Wilmington, Delaware, organized and incorporated in Delaware on September 8, 1936, and is therefore diverse. Avtex is also associated with Pope Mortgage Company, the plaintiff's initial home mortgagee, a Delaware corporation, whose registered or principal office is located at 1209 Orange Street in Wilmington, Delaware, and whose registered agent is C. T. Corporation System. To the plaintiff's knowledge, Pope had his home inspected prior to closing. Avtex is also associated with the plaintiff's current mortgage company, BancBoston Mortgage Corporation out of Jacksonville, Florida, by way of C. T. Corporation System. There is diversity with Avtex. (See page 8 of Plaintiff's Memorandum of Exception to Recommendation to the Court, Articles of Incorporation from the State of North Carolina of Avtex Properties, Inc., Articles of Incorporation from the State of Delaware for Pope Mortgage Company and Articles of Incorporation with the names and addresses of all directors and officers attached for BancBoston Mortgage Corporation from the State of North

Carolina and copy of C. T. Corporation System qualification document to operate in South Carolina -- its registered agent Charles E. McDonald, Jr., and registered address, 75 Beattie Place, Two Shelter Center, Greenville, South Carolina 29601.)

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The plaintiff submits that this case was not filed out of frustration and/or anger as suggested in the Court's Order, page 10, 2nd paragraph, 8th line, "... it is evident that he has commenced this action out of anger and frustration. The Magistrate Judge reports on his several efforts to offer the plaintiff guidance on procedural matters; and he states that the plaintiff was unable to grasp the significance of some of the arguments made by the movant and that therefore has been unnecessarily prolonged." The plaintiff politely suggest that the Honorable Magistrate Gambrell may have prolonged this case unnecessarily by suggesting to the plaintiff on several occasions that he sign Stipulation of Dismissal, that he respond to a Motion to Dismiss by Sanders and Maryland Casualty Company filed some 50 or so days after the filing of their answer, without any request to the Court to enlarge time, and more importantly, by granting the State defendants up to October 26, 1990 to make a particular response, for which they have failed to do so to this very day. (See letter dated October 15, 1990 from Nauful & Ellis, plus attachments previously referenced.) The plaintiff filed this complaint because the State system failed to protect his Civil Rights and discriminated against him, including the Attorney General's Office by not investigating and/or prosecuting obvious public corruption cited by the plaintiff by way

of specific code of laws in some cases. (See attachments.) It is also the desire of the plaintiff that this Honorable Court, through injunctive relief, force the Attorney General's Office to make appropriate investigation of criminal acts, and force the various State agencies to provide the plaintiff documents denied him through the Freedom of Information Act.

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The plaintiff submits that it has always been his intention to have the Court review state administrative proceedings and this was the vehicle through which he wanted individuals "to be brought into accountability for denying him the opportunity to fully exercise his rights or privileges as a citizen of the State of South Carolina and the United States on an equal footing with the defendants." The plaintiff throughout his pleadings clearly express and allege racial discrimination and public corruption. (See page 6 of Court's Order commencing line 1.) The plaintiff's statement commencing at line 3, page 10 of his Memorandum of Exception, "The plaintiff realizes that administrative proceedings are not reviewable by this Court and this is not what the plaintiff has asked for in the complaint", was precipitated by the Honorable Magistrate Judge Gambrell's statement in the last 2 lines of footnote 18, page 13 of his Recommendation to the Court, "... and that decisions of a state administrative agency cannot be appealed to this Court." Even so, the plaintiff throughout his pleadings clearly cries out to the Court to review state administrative proceedings.

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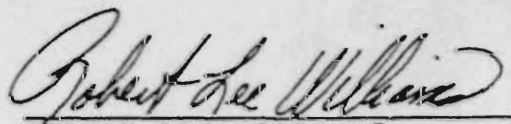
The plaintiff submits to this Honorable Court that the State defendants have violated his Civil Rights, discriminated against him and have violated what appears to be public corruption laws.

The plaintiff asserts that the State defendants' Motion to Dismiss and Rule 11 Sanctions contain some willful misrepresentation of facts, particularly in regards to the defendant Watkins. The plaintiff addresses these matters in his response and exception.

Research is continuing, and additional exhibits will be provided.

The plaintiff in conclusion request of this Honorable Court that leave be granted to amend complaint, or in the alternative, to remand the case to the lower court with instructions to grant leave to amend and to obtain legal counsel.

Respectfully submitted,



ROBERT LEE WILLIAMS
Representative for the
Plaintiff (PRO SE)
104 McNeel
Columbia, SC 29223
(803) 788-5494 (After 5:30 pm)
(803) 748-3254 (8:30 am to 5:00 pm)

United States Court of Appeals
for the Fourth Circuit

Tenth & Main Streets
Richmond, Virginia 23219
(804) 771-2213
FTS 925-2213

DOCKETING STATEMENT

Caption of Case

Robert Lee Williams

4CCA Docket No. _____

Type of Action

☒ Civil
☐ Criminal/Prisoner
☐ Cross Appeal

v.

C. Errol Catoe, Et Al

District OF SOUTH CAROLINA

Judge MATTHEW J. PERRY

District Court Docket Number 3:90-1424-0H

Statute or other authority establishing jurisdiction in the:

District Court Title 42 Sect 1983; USC 28 Sect 1343; USC 28 Sect 1443; Pendency;

Court of Appeals SAME AS FOR DISTRICT COURT ABOVE

A. Timeliness of Appeal

1. Date of entry of judgment or order appealed from JUNE 26, 1991
2. Date this notice of appeal filed JULY 26, 1991
If cross appeal, date first notice of appeal filed _____
3. Filing date of any post-judgment motion filed by any party which tolls time under FRAP 4(a)(4) or 4(b) _____
4. Date of entry of order deciding above post-judgment motion _____
5. Filing date of any motion to extend time under FRAP 4(a)(5) or 4(b) _____
Time extended to _____

B. Finality of Order or Judgment

1. Is the order or judgment appealed from a final decision on the merits? yes (X) no ()
2. If no, a.) Did the district court order entry of judgment as to less than all claims or all parties pursuant to FRCP 54(b)? yes () no ()
b.) Is the order appealed from a collateral or interlocutory order reviewable under any exception to the finality rule? yes () no () I have examined the above rule but
If yes, explain Am not Completely Sure how I should answer
(Criminal only)
3. Has the defendant been convicted? yes () no ()
4. Has a sentence been imposed? yes () no () Term _____
5. Is the defendant incarcerated? yes () no ()

C. Has this case previously been appealed? yes () no (X)

If yes, give the case name, docket number and disposition of each prior appeal on a separate sheet.

D. Are any related cases or cases raising related issues pending in this court, any district court of this circuit, or the Supreme Court? yes () no (X)

If yes, cite the case and the manner in which it is related on a separate sheet.

E. State the nature of the suit, the relief sought, and the outcome below. The suit was filed in the District Court to recover damages from State Officials "For Deprivation of Right and to recover damages from private individuals who conspired with the State, officials and staffs) to interfere with the Plaintiff's civil rights in proceeding originating from the South Carolina Licensing Board from Contractor through which the Plaintiff filed a Complaint against his builder for faulty construction. The Plaintiff filed a suit with the State Court for which he included included his Federal suit under Pendent jurisdiction. Plaintiff sought relief for Intention Infliction of Emotional Distress; Mental Anguish and Defamation of Character; Libel & Slander and for such other relief the court deemed necessary and proper. Case

lack of or insufficient showing of Civil Rights Violations, or Racial Discrimination.

- F. Issues to be raised on appeal. Attach one additional page if necessary. (1) Plaintiff will show that many of elements that the Court said were missing from his case to merit Continuing were present in some form of Pleading filed in the case (2) The Plaintiff will show that diversity exist with Autex, as well as Maryland Casualty Company, and that Partial diversity exist with Nelson, Mullins, Riley & Scarborough (3) The Plaintiff will also show that the Honorable Magistrate Judge, Charles W. Gambon more than one occasion suggested to the Plaintiff to sign Stipulation of Dismissal for Pulliam, and Richardson, Plowden, Grier & Howsen, who have a level of diversity as reflected on their various letter heads filed in the case to avoid Rule 11 Sanction and imposition of attorney fees (4) The Plaintiff will also show the Court that the Honorable Magistrate denied the Plaintiff the opportunity to bring in Counsel, after the Plaintiff's Physician, by way of letter written to Magistrate on September 14, 1990 by the Plaintiff, that he
- G. Is settlement being discussed? yes () no (X)
- H. Is disposition on motions, memoranda, or an abbreviated briefing schedule appropriate? yes () no () If yes, explain on a separate sheet. Is oral argument necessary? yes (X) no ()

- I. Were there any in-court proceedings below? yes () no (X)
Is a transcript necessary for this appeal? yes (X) no ()
If yes, is transcript already on file with district court? yes (X) no () If transcript is not already on file, attach copy 1 of transcript order.

- J. List each adverse party to the appeal. Attach additional sheets if necessary. If no attorney, give address and telephone number of the adverse party.

Autex Properties, Inc./Autex Construction Company, Nelson, Mullins, Riley & Scarborough
Robert Small, Jr., Alan, Adair, Melody Renee Black, Edward Mullins
George K. Lyall & Nina Nelson Smith

1. Adverse party Priney, Britton, Gibbs & Clarkson, P.A. (3)
Attorney N. Heyward Clarkson, III
Address 300 EAST COFFEE STREET
Telephone Post Office Box 10589
Greenville, SC 29603
(803) 271-9580

Carl B. Epps, III
1901 Main Street
Post Office Box 1473
Columbia, SC 29202
(803) 254-2200

2. Adverse party Jerry D. Sanders & Maryland Casualty Company

Attorney Steven A. Snyder
Address 300 EAST NINTH STREET, SUITE 2
PO Box 1036, FEDERAL STATION
Telephone Greenville, SC 29603-0367
(803) 242-2300

K. Appellant(s) Name Robert Lee Williams

If incarcerated, give identification number _____

Address (If incarcerated, give institution address) _____

South Carolina 29223

Telephone 104 McNeely Road, Columbia,
(803) 788-5494
OR (803) 748-3254

- L. Attorney or pro se litigant filing Docketing Statement. Will you be handling the appeal? (In criminal cases counsel below will handle the appeal unless relieved by this court.) yes (X) no ()

Name Robert Lee Williams

Attorney () Pro se (X)

Firm _____

Address SAME AS IN "K"

Telephone SAME AS ABOVE

If this is a joint statement by multiple appellants, add the names and addresses of other appellants and counsel joining in this Docketing Statement on an additional sheet, accompanied by a certification that all appellants concur in this filing.

Signature Robert Lee Williams

Date August 5, 1991

ATTACH:

1. ADDITIONAL PAGES, IF ANY, CONTAINING EXTENDED ANSWERS TO QUESTIONS ON THIS FORM.
2. A COPY OF THE ORDER OR JUDGMENT FROM WHICH THE APPEAL IS TAKEN.
3. COPY 1 OF THE TRANSCRIPT ORDER, IF ANY.
4. A CERTIFICATE OF SERVICE

F. (CONTINUED)

was medically, physically & psychologically, unable to continue in the case, particularly since he had developed temporary states of amnesia and was unable to fully grasp the content of documents (5) The Plaintiff will show that the Honorable Magistrate Gambrell could not have considered the Plaintiff's Amended Complaint in his Recommendation to the Court, as suggested in the Court's Judgement Order, since the Plaintiff never filed an Amended Complaint, but only a Motion to Take Leave and Amend Complaint; the Plaintiff will attempt to show that the Court may have erred by not allowing the Amending of the Complaint before Dismissing Case; the Plaintiff will show that references to having his Complaint amended were made on September 20, 1990, October 1, 1990 and October 9, 1990, as well as October 10, 1990 (Plaintiff sign Stipulation of Dismissal for Pulliam & Richardson, Plowden, Green & Howser on October 19, 1990) (6) The Plaintiff will show that the Honorable Magistrate Gambrell and the Court, subsequently, erred by allowing Jerry DeSantis & Maryland Casualty Company to file a Motion to Dismiss Pursuant to Rule 12(b)(6) some 50 or 50 days after filing their answer without any request to the Court to enlarge time when the Plaintiff was given 17 to 20 days to respond to various Motions, or have his right to do so waived; (7) The Plaintiff will also raise the issue that the Honorable Magistrate Gambrell may have abrogated his duty to remain impartial by becoming associated with a defensive posture in the case; Maybe Magistrate Gambrell should have revealed to the Court that his son, Charles W. Gambrell, Jr. is Chief Assistant Attorney General for the State of South Carolina working out of the Government and Civil Litigation Division (8) Plaintiff will raise the issue that Magistrate Gambrell may have mis-used his official position as a Magistrate to impose an undue influence upon him in order to influence his position on how to proceed; the Plaintiff will also raise the issue that every case law, to the Plaintiff's best knowledge, cited by Magistrate Gambrell to impose Rule 11 Sanction and Attorneys fees upon the Plaintiff dealt with Attorneys (9) Plaintiff will also raise issue regarding lack of response to Court, to this very day, by Attorneys for the state Defendants which, in part, led to unnecessary delay in Case (10) Plaintiff will show that Jerry D. Sanders of Maryland Casualty Company acquiesced in and/or willfully supported the production & introduction of manufactured evidence by attorneys and others involved in this Case (11) The Plaintiff will also show a former or current financial relationship between a Partner in Nelson, Mullins, Riley & Scarborough, who represented Autex before Contractor (12)

J. (Continued)

- (4) C. Errol Catoe, Individually and as Executive Director of the South Carolina Licensing Board for Contractors; Harry Kent, Individually and as Vice-Chairman of the South Carolina Licensing Board for Contractors; Walter Hunter, Individually and as a Board Member of the South Carolina Licensing Board for Contractors; Gary Shelton, Individually and as a Board Member of the South Carolina Licensing Board for Contractors; John T. Watkins, Individually and as Director of the Home Builders Commission of South Carolina; Alice C. Broadwater, Individually and as Assistant Attorney General in Charge of Civil Litigation for South Carolina; C. Victor Pyle, Jr., Individually and as Judge for the State of South Carolina

Attorney: William H. Davidson, II

Address: 1901 Gadsden Street
Post Office Box 2285
Columbia, SC 29202

Telephone: (803) 254-4190

§

Office of the Attorney General of South Carolina
Edwin E. Evans, Chief Deputy Attorney General
Rembert C. Dennis Building
Post Office Box 11549
Columbia, SC 29211
(803) 734-3970

Robert Williams
104 McNeely Road
Columbia, SS 29223
September 3, 1991

The Honorable John M. Greacen
Clerk of Court for U.S. Court
of Appeals for the Fourth Circuit
United States Courthouse
Tenth and Main Streets
Richmond, Virginia 23219

Re: Robert Lee Williams v. C. Errol Catoe, et al
Fourth Circuit Docket Number 91-2173
Civil Action No. 3:90-1424-oh

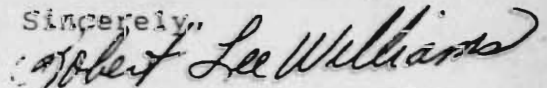
Dear Mr. Greacen:

I enclose herewith the original and copy of the Appellant's
informal brief. As of the above date has been served
upon the counsels below by way certified mail, return receipt
requested.

I apologize to the Court for hand writing the brief the way I
did. I thought I had made a copy of the document, but when I realized
I did not, it was too late for I had nearly completed the brief. I
will type out another brief if the Court so desires, and if I am sent
another form.

With kind regards,

Sincerely,



Robert Lee Williams

RLW:rlw

Enclosure

93040960092

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

91-2173 Williams v. Catoe
CA-90-1424-OH

INFORMAL BRIEF

Directions: Answer the following questions about the appeal to the best of your ability. Use additional sheets of paper, if necessary. You need not limit your brief solely to this form but you should be certain that whatever you file answers the questions below. In any event, the court prefers short and direct statements.

1. Did the district court fail to consider important grounds for relief. If so, what grounds? YES.

ALL ELEMENTS, I BELIEVE, THE COURT SAID WERE MISSING FROM THIS CASE TO JUSTIFY SOME FORM OF RELIEF, INCLUDING INJUNCTIVE RELIEF TO COMPEL THE ATTORNEY GENERAL TO TAKE ACTION AGAINST PUBLIC CORRUPTION AND OTHER CRIMES, WERE PRESENT IN THE CASE IN SOME FORM OF PLEADING.

2. Did the district court incorrectly decide the facts? If so, what facts? YES.

(a) COURT DISMISSED CASE ON THE GROUND THAT THERE WAS NO DIVERSITY (b) ON THE GROUNDS THAT IT LACKED JURISDICTION (c) ON THE GROUNDS THAT THERE WAS NO CIVIL RIGHTS VIOLATION, AND CONSEQUENTLY NO 14th AMENDMENT VIOLATION, AND THEREFORE, NO CLAIM UNDER 42 USC 1983 AND 42 USC SECTION 1985

3. Do you think the district court applied the wrong law? If so, what law do you want applied? YES.

— 28 USC SECTION 1332(a)

— 28 USC SECTION 1331

— 28 USC SECTION 1343

— 42 USC SECTION 1985

— 42 USC SECTION 1983

— IF POSSIBLE, CIVIL APPLICATION OF RICO CONSPIRACIES (RACKETEER INFLUENCE AND CORRUPT ORGANIZATIONS ACT OF 1970)

— IF POSSIBLE, 18 USC 241

4. Do you feel that there are any other reasons why the district court's judgment was wrong? If so, what?
YES. THE COURT DISMISSED MARYLAND CASUALTY COMPANY, & JERRY SANDERS OF SEINE, BASED UPON THEIR MOTION TO DISMISS ACCORDING TO RULE 6(b) WHICH WAS FILED SOME 50 OR SO DAYS AFTER FILING THEIR ANSWER WITHOUT ANY REQUEST TO THE COURT TO ENLARGE TIME, IN VIOLATION OF COURT RULES AND A PRIVILEGE NOT GIVEN ME. THE COURT IN GENERAL APPEARS TO HAVE TAKEN A DEFENSIVE POSTURE IN THIS CASE AND ABROGATED ITS ABILITY TO REMAIN IMPARTIAL: THE SON OF THE HONORABLE MAGISTRATE GAMBRELL, CHARLES W. GAMBRELL, JR., IS CHIEF ASSISTANT ATTORNEY GENERAL FOR THE STATE OF SOUTH CAROLINA.
5. What action do you want the Court to take in this case? I WOULD LIKE FIRST OF ALL FOR THE COURT TO REVOKE THE \$1,000.00 FEE IMPOSED BY THE DISTRICT COURT; SECONDLY, AFTER THE COURT EXAMINES THE FACTS, AND PERHAPS DETERMINES THAT IT SHOULD NOT HAVE BEEN DISMISS BY THE DISTRICT COURT, THAT IT HEAR THE CASE INSTEAD OF SENDING THE CASE BACK TO THE DISTRICT COURT, IF THIS IS A REASONABLE REQUEST AND WITHIN THE JURISDICTION OF THE COURT. I KNOW THIS IS A SLIGHTLY DIFFERENT REQUEST FROM WHAT IS STATED IN MY NOTICE OF APPEAL, BUT I AM NOT SURE OF ANYTHING AT THIS POINT. I WOULD ALSO REQUEST OF THE COURT THAT IT CONSIDER OR RECOMMEND DISCIPLINARY MEASURES FOR ATTORNEYS WHO HAVE ENGAGED IN MISCONDUCT IN VIOLATION OF THEIR OATH OF OFFICE.
6. If you think the Court should hear oral argument in this case, why do you think so? I BELIEVE THAT ORAL ARGUMENT IS NECESSARY BECAUSE INFORMATION REGARDING ASSOCIATE CORPORATIONS INVOLVED IN THIS CASE (MERGERS, DISSOLUTIONS, NAME CHANGES), THOUGH ORDERED, HAS NOT BEEN RECEIVED AT THE COMPLETING OF THIS DOCUMENT. ORAL ARGUMENT WILL BE NECESSARY TO EXPLAIN MUCH OF THE TECHNICAL OR STRUCTURAL REPORTS TO GIVE THE COURT A CLEARER PICTURE OF THE SERIOUS INFRACTIONS IN JUSTICE THAT HAS OCCURED, AND THE FAILURE PERSONS WHO COULD HAVE PREVENTED THEM, TO DO SO.

Robert Lee Williams

Signature
NOTARY NOT REQUIRED

September 3, 1991

IMPORTANT: A COPY OF THIS BRIEF AND ANY ATTACHMENTS MUST

BE SENT TO ALL PARTIES IN THE CASE. PLEASE LIST BELOW THE

NAMES AND ADDRESSES OF THE PARTIES WHO WERE SENT A COPY

OF YOUR BRIEF, TOGETHER WITH THE DATES ON WHICH THEY WERE SENT.

DARRELL JACKSON...

INNOVATIVE and PROGRESSIVE LEADERSHIP

Experience:

Member of the Board of Directors, Sistercare, Inc.
Member of the Alcohol-Safe Communities Task Force
Member of the Mayor's Task Force ("Fighting Back")
Member of the Richland School District One
After-Care Task Force
Member of the Meadowfield Elementary School
Endowment Foundation
Member of the Columbia Chamber of Commerce
Public Relations Committee

Leadership:

Trustee for United Way of the Midlands
Executive Director of the S.C. Coalition of Black
Church Leaders, Inc.
Chairman of the Public Relations Committee for the
S.C. Branch of the NAACP
Founding Partner/Co-Owner of Sunrise Enterprise of
Columbia, Inc.
Assistant Pastor of the Bibleway Church of Atlas Road

Education:

Received a B.A. Degree in Public Administration
from Benedict College
Attended University of South Carolina School of Law
Received a M.A. in Theology from Columbia Bible
College and Seminary

Family:

Darrell is married to Willie Mae Rooks. They
have two sons, D.J., age 8 and Antoine Joseph, age 5.

For more information contact:

Darrell Jackson

P.O. Box 3076 • Columbia, S.C. 29230 • 774-0325

93040960095



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 15, 1992

Robert Williams
104 McNeely Road
Columbia, SC 29223

Dear Mr. Williams:

23040960096
This is to acknowledge receipt on May 12, 1992, of your letter dated May 9, 1992. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter did not contain a notarization on your signature and was not properly sworn to.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this ____ day of ____, 19__." A statement by the notary that the complaint was sworn to and subscribed before him/her also will be sufficient. We are sorry for the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission. The file regarding this correspondence will remain confidential for a 15 day time period during which you may file an amended complaint as specified above. If the defects are not cured and the allegations are not refiled, no additional notification will be provided and the file will be closed.

If you have any questions concerning this matter, please contact me at (202) 219-3410.

Sincerely,

Retha Dixon
Retha Dixon
Docket Chief

Enclosure
cc: Clinton Campaign
Sunrise Enterprise

JUN 1 11 25 AM '92

Robert Lee Williams
104 McRee Road
Columbia, SC 29223
May 22, 1992

MUR 3534

The Honorable Jo Ann Aikens
Chairwoman
Federal Election Commission
c/o Ms. Retha Dixon
Docket Chief
999 E Street, NW
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF LEGAL COUNSEL
92 JUN -1 PM 3:10

Dear Ms. Dixon:

Re: Request For Investigation Of The Bill
Clinton Campaign and Service Enterprise
Of Columbia, Inc.

This letter is to acknowledge receipt on May
20, 1992 of your letter dated May 15, 1992.

I have enclosed herewith a statement sworn
to before a Notary as requested and required.
Incorporated as a part of this sworn state-
ment is a copy of the original Complaint
documents sent Mrs. Aikens.

Also, for your information, I am informed

93040960097

93040960098
and of the belief that Mr. Jackson and Darrell Jackson, Partners in Sunrise Enterprise of Columbia, Inc., have split, at least on paper, with Heyward Bannister, a former Partner in same, on May 15, 1992, possibly to avoid an association with the Bill Clinton Campaign as I suggested they would in my letter to Mrs. Alfano of May 9, 1992. I have been informed that Heyward Bannister's New Company, Banco Bannister Company of 106 Doctors Circle, Columbia, SC 29203, telephone number (803) 929-1130, is now handling the Bill Clinton Campaign. Mr. Charles Aiken, owner of Health Force, I believe, also located at 106 Doctors Circle, and whom I believe is sub. leasing or renting space to Mr. Bannister, may be able to provide information, at least regarding the rental/lease agreement that may be of some help to you. His telephone number is 779-0818.

The following persons, I believe, will be able to provide you with some information regarding the Jacksons and Sunrise Enterprise of Columbia, Inc. And their involvement with the Clinton Campaign:

- 1) William Deloach
Lobbyist, Political Consultant, Public Relations,
Etc.
1108 Woodrow Street
Columbia, SC
(803) 771-0123

- 2) Members of The Legislative
Black Caucus, including
- (a) Kay Patterson (Senator)
 - (b) Rep. McKinley Washington
 - (c) Juanita M. White
 - (d) Livola Taylor

Please let me know if there is anything
additional I need to do to make my complaint
"legally sufficient".

I extend my thanks to you and Mrs.
Aikens for the time you have given to
this matter.

With kind regards,

Robert Williams

PS

Again, I would like to politely point out that
the basis for my Complaint to the Honorable
Commission Commences at page No. 3 of my
seventeen (17) page document to Mr. Gary Baker,
Executive Director of the State of South Carolina
Ethics Commission, dated May 4, 1992.

STATE OF SOUTH CAROLINA

COUNTY OF Richland

Personally appeared before me Laris H. Bayton
who, first being duly sworn, says that he/she has read and knows
the contents of the attached complaint and that the allegations
contained therein, are true and correct to the best of
his own knowledge, except for those matters
therein based upon information and belief, and as to those he/she
believes them to be true.

Sworn to and subscribed before me this

22 day of May 19 92

Laris H. Bayton
Notary Public for South Carolina

My Commission Expires 2-14-2000

Robert Lee Williams
COMPLAINANT'S SIGNATURE

93040960100

Robert Williams
104 McNeely Rd.
Columbia, SC 29223

May 9, 1992

The Honorable Joan Aikens
Chairwoman
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Dear Mrs Aikens:

Re: Request for Investigation of the
Bill Clinton Campaign With
Regards To The Enclosed Documents
For Possible Violation of
Federal Elections Laws

I enclose, herewith, a number of
documents outlining my reasons for
requesting the referenced investigation.

I particularly direct your attention to the

23040960101

Seventeen (17) page document written to
Larry Baker, Executive Director of
the South Carolina State Ethics
Commission, commencing especially
at page three (3), the letters to the
U.S. Attorney General, William Barr, Chief
Robert Stewart of the South Carolina
Law Enforcement Division, Richard
Harpothian, 5th Circuit Solicitor of
South Carolina, and the letters from
Carroll Campbell, Governor of South
Carolina and Jim Miles, Secretary
of State of South Carolina.

Please be aware that Darrell Jackson
and Bishop H.C. Jackson may have or
maybe attempting to distance themselves
from the Clinton Campaign and
Keyward Bonnieter, a partner in Sunrise
Enterprise, and the Corporation, possibly,
because they were aware of the various
request for investigations to be made
by me.

Ray Lee Belton, my close friend, a
member of the Bibleway Church of Atlanta

93040960103
Head, a ● ● fellow Oxford Minister,
was asked by me to meet as an
impartial observer and as the Bible
requires Christian brethren to do when
there is unresolvable differences, with A.C.
Jackson and his son, Darrell Jackson,
and me regarding their financial
involvement with the Bill Clinton
Campaign as a Pastor and Assistant
Pastor and other matters contained in
the documents attached hereto. In this
meeting, both A.C. Jackson and Darrell
Jackson expressed their financial
involvement with the Bill Clinton
Campaign. Darrell Jackson also stated
in this meeting that they ^{had} hired Judie
Miller, a political consultant, to help
run the Bill Clinton Campaign
in South Carolina.

I know that I have sent you a great
deal of material to read, but thought
it was necessary to give you a clearer
understanding of my request

Please let me hear from you soon, and if
you should have a question, please
call me at 748-3254 or 788-5494.

with kind regards

Sincerely,
Robert Williams

Robert Williams
104 McTeely Rd.
Columbia, SC 29223

May 10, 1992

The Office of The U.S. Attorney
c/o U.S. Attorney For the South Carolina
District
1441 Main Street
Columbia, SC 29201

Dear Sir:

Re: Request For Investigation Of The
Bill Clinton Campaign With
Regards To The Content Of The
Enclosed Documents For Possible
Violation Of Federal Election Laws,
Plus Other Possible Violations

First of all, I would like to apologize for not
being able to recall your name at the
writing of this letter, and also understand
that Mr. E. Bart Daniel is no longer with
your office.

93040960104

23040960105
Though I have sent this information
to the US Attorney General, Mr.
William Barr, at the suggestion of
the Honorable Jim Mills, Secretary
of State for the State of South
Carolina, I deliver this information
to you since Mr. Mills does not have
jurisdiction. Mr. Barr and Mr. John
Dunne, should receive this documents
on Monday by express mail (the
documents were sent to Mr. Barr/
Mr. Dunne on 5/8/92 around or
shortly after 3:00 pm). Please call Mr.
Barr or Mr. Dunne and inform them of
this letter and documents to you.

Please let me hear from you soon, and
call me at 748-3254 or 788-5494.

With Kind regards,

Sincerely,

Robert Williams

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☐ Military 1st Day	☐ Military 2nd Day		
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Corporate Account No.		Account No.	
FROM: Robert Williams 104 McNeely Rd Columbia, SC 29223			



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Waiver of Signature and Indemnity (Domestic Only) I wish delivery to be made without requiring the signature of the addressee or the addressee's agent or in the judgment of the delivery employee, the article sent in the mail is a secure package and I authorize the delivery employee to sign that the package was delivered and understand that the signature of the delivery employee will constitute valid proof of delivery.	Telephone Number: 564-5643 TO: C/O JOHN DUNNE ATTORNEY GENERAL U.S. DEPT. OF JUSTICE BLDG 104 CONSTITUTION AVENUE, N.W. WASHINGTON, DC 20530
--	---

93040960106

STATE OF SOUTH CAROLINA
OFFICE OF THE SECRETARY OF STATE

JIM MILES
SECRETARY OF STATE



P.O. BOX 11350

COLUMBIA
29211

May 8, 1992

Mr. Robert L. Williams
104 McNeely Road
Columbia, SC 29223

Dear Mr. Williams:

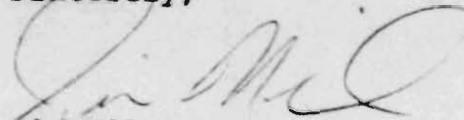
Thank you for your correspondence of May 5, 1992.

My staff has carefully reviewed the information you sent. As most of your correspondence deals with allegations surrounding a United States Presidential campaign, this office has no jurisdiction.

I would suggest you forward your information to the nearest office of the United States Attorney.

Thank you for your time.

Sincerely,


Jim Miles
Secretary of State

93040960107

Robert Williams
104 McNeely Rd.
Columbia, SC 29223

May 7, 1992

The Honorable William Barr
US Attorney General
C/O The Honorable John B. Dunne
Civil Rights Division
Room 5643
Main Justice Building
10th & Constitution Avenue, N.W.
Washington, DC 20530

Dear Mr. Barr:

Re: Robert Williams vs C. Enol Catoe
et al -- your Reference File #
DJ 144-67-0
Also matter related to Bill Clinton's Campaign

I respectfully direct your attention to
the enclosed letter from Mr. Dunne,
prepared by Ms Peggy L. Fong,
Paralegal Specialist, Criminal Section,
dated March 9, 1992. I am very grateful

93040960108

for the excellent job Mr. Dunn and
his staff have performed.

with the senseless violence that has
occurred in Los Angeles, I realize
that your staff is stretched to
their limits. But, a similar violence,
though not in the form of killing,
looting and burning, has been unearthed
with respect to the referenced case
number, the magnitude of which was
not completely known when my
request was made to you in September
of 1991, that may require a reopening
of my case and or an independent
investigation. I did not know at
the time of my filing with your
office that my Assistant Pastor
and Pastor, H.C. Jackson of the
Bibleway Church of Atlas Road
were paid agents of the Bill
Clinton Campaign. Darrell Jackson, the
son of H.C. Jackson was my Assistant
Pastor. They attempted to bribe & dissuade
me from pursuing my Federal
Court case and the investigation with
the Justice Department because of
the Political Impact such pursuits
could have on the Bill Clinton
Campaign for President. If revealed to
the public that a South Carolina

Campaign Chairman, Richard W. Riley, was
named or involved in a Federal Law-
suit and Justice Department investigation.

In the attached documents, including
my correspondence to The Honorable
Carroll Campbell, Governor of South
Carolina, and his correspondence to
me by way of his Chief Legal
Counsel, I state in great detail my
reasons for requesting a re-opening of
my case or an independent investigation.

I am also requesting of the Federal
Elections Commission to commence
an investigation on possible violation
of Federal Elections by the Bill
Clinton Campaign. Investigations are
now under way by the following
local offices: South Carolina Law Enforcement,
Solicitor's Office (Richard Harpootian);
Ethics Commission; Secretary of State;
State Elections Commission; State
Tax Commission; the Internal Revenue
Service will also be asked to make
an investigation for violations by
the Jacksons and others of Section
501 (C)(4).

Call me at 748-3254 or 788-5494 should

you have a question.

Thanks Very Much,

Robert Williams

PS I have been informed that Davell Jackson and (Bishop) A. C. Jackson maybe attempting to disassociate themselves from their Corporation Sunrise Enterprise of Columbia, Inc., in a possible attempt to dissolve themselves of a financial relationship with Mr. Clinton, the South Carolina Coalition of Black Church Leaders, Inc and Project ADMM. (See Seventeen Page Document to State Ethics Commission.

Robert Williams
104 McNeely Rd
Columbia, SC 29223
May 4, 1992

The Honorable Gary R. Baker
Executive Director
State Ethics Commission
5000 Thurmond Mall
Suite 111
P.O. Box 11926
Columbia, SC 29211

Dear Mr. Baker:

Re: Darrell Jackson Statement of Economic
Interest Form And Campaign
Disclosure Form -- Annual Update/
Quarterly Update

I believe it was on either April 22, 1992
or April 23, 1992 that I visited your
office to pick up copies of Darrell
Jackson's forms referenced above. I
and your office personnel did locate the
most recent Statement of Economic
Interest Form, but were unable to
locate a most recent Campaign Disclosure
Form. With my limited knowledge of the
Ethics Law and upon information and belief,
Mr. Jackson's Statement of Economic
Interest Form appears to be incomplete.

For example, Hayward Bannister, a partner in Mr. Jackson's Company, Sunrise Enterprise of Columbia, Inc., was very recently or is a registered lobbyist at least in the State of South Carolina, but is not listed in item 19 of page 3 of the Economic Interests form. I am of the belief and am informed that Mr. Jackson and Sunrise Enterprise of Columbia, Inc., have been awarded or currently hold contracts for which they are receiving monetary compensation from state and local public agencies in excess of \$500.00 (item 13 of page 2 and item # 20 of page). Item # 22 page 4 may also be applicable to Mr. Jackson. See item # E of the enclosed Charter of Sunrise Enterprise of Columbia, Inc., filed December 4, 1986 and Notice of Change of Registered Office or Registered Agent or Both filed January 3, 1989 with the State of South Carolina Secretary of State. H. C. Jackson, the father of Darrell Jackson, an incorporator, shareholder and silent partner and Chairman of the Board, I believe, of Sunrise Enterprise of Columbia, Inc., is in a position to provide this Commission with information pertaining to contracts received from state and local public agencies. Records from the various state and local public agencies should also be available.

93040260114

For the Commission's information,
Darrell Jackson, I believe and am
informed by the office of Bishop
F.C. James on April 21, 1992 or April
22, 1992, is the Executive Director of
The South Carolina Coalition of Black
Church Leaders, Inc., a non-profit
corporation within the meaning of
section 501(c)(4) of the Internal
Revenue Code of 1986. The managing officers
of this Coalition is Bishop F.C. James and
Bishop A.C. Jackson (this is the same A.C.
Jackson that is listed as a partner
in Sunrise and the father of Darrell
Jackson). Darrell Jackson as of the same
date above, was said by Bishop F.C.
James' office to also be the Executive
Director of Project ADAM, an anti-
drug and alcohol program, operated
and funded, I believe, through grants,
possibly state, local and federal grants,
through The South Carolina Coalition of
Black Church Leaders, Inc. I am of the
belief and am informed that Darrell
Jackson and A.C. Jackson (Bishop) and
their company Sunrise Enterprise of
Columbia, Inc., drafted grant proposals for
state, local and or federal public agency
funding, with the knowledge and intent
that they would be awarded the contract

93040960115

from the South Carolina Coalition of Black Church Leaders, Inc. to manage this Project. Darrell Jackson, A.C. Jackson and Sunrise, I am informed and believe to manage Project ADAM, and Darrell Jackson as Executive Director of same may be receiving additional compensation from the Coalition of Black Church Leaders for the position as well as a share of the proceeds paid directly to Sunrise. (See enclosed Certificate of Incorporation for The South Carolina Coalition of Black Church Leaders, Inc. dated July 15, 1992). A.C. Jackson, Darrell Jackson's father is also believed to be Co-Chairman or Vice-Chairman of Project ADAM - I respectfully request of this Honorable Commission that it render an opinion as to whether or not payments made by Bob Cable and some other public Officials during the course of campaigning to Darrell Jackson and Sunrise Enterprise of Columbia, Inc., can be classified as lobbying related expenses; the same would be the case with the Bill Clinton Campaign for which Darrell Jackson and Sunrise Enterprise of Columbia, Inc. were/are being paid to manage. (See the enclosed four pages from Campaign Disclosure of Bob Cable; two of the pages show payments to Sunrise and Darrell

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Jackson 27,856.98 Consulting fees,
etc., and the others show contributions of
\$1,100.00 to Mr. Cobb's Campaign from
Darell Jackson, Heyward Bannister and
Sunrise Enterprise of Columbia Inc. I am informed
and of the belief that Darell and A.C. Jackson and Sun-
rise Enterprise are currently working a contract for the City
of Columbia.
During the day of my inspection of Darell
Jackson's file, unless the information was
mis-filed or I overlooked it, there was
no Campaign Disclosure, especially as it
relates to Campaign Contributions, beyond
July 8, 1988 up to the information filed by
Mr. Jackson on April 7, 1992 and received
by your office on April 9, 1992. I have
some evidence that Mr. Jackson has received
Contributions beyond 1988; Mr. Jackson is
my former Assistant Pastor and his
father, A.C. Jackson my former Pastor and
I have recently written and spoken to them about
what I believe to be questionable ethical practices.
If the law requires, I would appreciate
more detailed information from Mr.
Jackson, if possible. The public would also
appreciate this information. It is my belief that
Darell Jackson has knowingly used the Coalition of
Black Church Leaders, Inc. for personal gain; unfair political
Please let me hear from you soon.

Sincerely,
Robert Williams

P5 By the time you receive this letter, I will
probably have reviewed Mr. Jackson's file again
for more updated information.

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with respect to Danell Jackson's involvement
with the Bill Clinton Campaign, the
Coalition of Black Church Leaders, Inc.,
and Project ADAM and Sunrise
Enterprise of Columbia, Inc., I believe
that there is sufficient evidence for
other entities such as the South
Carolina Elections Commission, the
State Tax Commission, the Internal
Revenue Service, South Carolina Law
Enforcement Division, the Solicitor,
Richard Harpootlian, the Federal
Elections Commission and the US
Attorney General, Mr. William Barr to
commence investigations for possible
violations of State and Federal laws.
By the time you receive this letter, I
will have presented this letter and
enclosures to some of the entities named
above, as well as some other information
and potential witnesses. I will also be
communicating with our Secretary of State
regarding possible Charter violations
by Danell Jackson and H.C. Jackson,
Danelli's father, who is also a public
official serving as a Commissioner with
Richmond County Department of Social
Services, the South Carolina Coalition
of Black Church Leaders/Project ADAM

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with respect to them and possibly others within the Organization(s) ^{and} using these Organizations for what appears to be purely personal gain and for political purposes, particularly as it relates to Governor Bill Clinton and his Campaign for President of the United States. There is circumstantial evidence and there is enough documented evidence that Darrell Jackson, A.C. Jackson, Darrell and A.C. Jackson's Assistant Pastor and Pastor of the Bibleway Church of Atlas Rd., respectively, and Bishop F.C. James Lobbied the Black Church leaders who are under their jurisdiction and who are a part of the South Carolina Coalition of Black Church Leaders, Inc., and through their National Religious Organization(s) affiliation, requested and to a great extent demanded of them that they, as well as their congregations, vote for Governor Bill Clinton, thereby closing their doors to all other political candidates' messages. I was informed by the office supervisor of the Bill Clinton Campaign that Darrell Jackson, A.C. Jackson and Heyward Bannister were being paid by the Bill Clinton Campaign, through their company Sunrise Enterprise of Columbia, Inc. to manage his Campaign in South Carolina; Judith or Judie Miller, a political consultant hired by Darrell Jackson, A.C. Jackson, Heyward Bannister of Sunrise, to serve as the up-front day to day manager of the Clinton Campaign here, apparently to disguise their questionable relationships as Assistant Pastor, Pastor and lobbyist. I was also

informed

that ^{some} ~~Bill Clinton~~ had made a couple of visitations, may have been one, I can't recall, for Bill Clinton's local Campaign office, here in Columbia, SC on Hampton St. to Clinton's National Campaign Headquarters in Arkansas to pick up Campaign literature. I am not sure whether Sunrise Enterprise paid for this trip though money received from Bill Clinton and even if that is not the case, this action is questionable for Darrell, A.C. Jackson and Bishop F.C. James, all of whom who are Ordained ministers, especially in the case of A.C. Jackson and Darrell Jackson, not to exclude Bishop James, particularly when they use the Church Pulpit and religious gathering to endorse Bill Clinton and to encourage their Church members to do so without giving other Candidates an opportunity to present their messages. Over or nearly 1,000 persons attending the Bibleway Church of Atlas Rekindled the distribution of Bill Clinton literature (by basically the membership of the Church to these persons) a week before the primary, at a Church service. Though the literature (a list of persons supporting Clinton and the reason for their support) for the most part was distributed in the lobby of the Church, which is for all practical purposes a part of the Church Sanctuary it was produced by Darrell Jackson, A.C. Jackson, Heyward Bonristin and Sunrise Enterprise Director, paid persons in the Bill Clinton Campaign through Sunrise Enterprise, Inc. As a former recent member and Ordained minister (Elder)

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of the Bible Way Church of Atlas Road
and the Bibleway Church Worldwide
Organization, I know for a fact that
if the Church was aware of, especially
A.C. Jackson's financial involvement
in the Bill Clinton Campaign, that
they would not have ratified the
introduction, the encouraging from the
Pulpit to take copies of the literature,
Nor the distribution of this literature
on the Church grounds. Therefore, either
A.C. Jackson and Darrell Jackson,
both Pastor and Assistant Pastor,
respectively, as well as Public Officials,
in consultation with each or with
their Church Executive Trustees and or
Trustees took it upon themselves to
introduce, encourage the taking of from
the pulpit and had distributed this
literature. Records from Darrell Jackson's
Campaign Disclosure for 1988, reveals he paid
a Minister and Deacon (of the Bibleway
Church of Atlas Road) Minister Harold
Coff and Deacon Roy Wiggins to
solicit votes for various Candidates
that Sunrise Enterprise of Columbia, Inc.,
I now understand was retained in
some form to help manage or manage some
their Campaigns (See Attachment from
Darrell's Disclosure of 1988 and Livola
Taylor, House of Representative, for 1991).

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On at least three different occasions,
I can recall H.C. Jackson as pastor
of the Bibleway Church of Atlas
Road, during Sunday morning services
and from the pulpit, endorsed, ~~and~~
demanded to a great extent in one case, that
the congregation of nearly a thousand
(1,000) persons or so vote for and
consider candidates; two of the candidates
were physically present when the statements
were made, the other Senator Theo
Mitchell, who was running for Governor
at the time was not present; Bob Coble,
current Mayor of Columbia, S.C. and Fivola
Taylor a member of the House of Representatives
in the State of South Carolina ^{were} the
other two candidates that ^{were} running for
office -- Mr. Coble 1990 and Mrs. Taylor
1991 (for seat removed from Jim Faber
for "Lost Trust" involvement). At the time
of these statements, I had absolutely no
knowledge or idea that H.C. Jackson
and Darrell Jackson, Assistant Pastor,
were paid agents of Mayor Coble's
Campaign and I doubt very seriously
whether anyone in the congregation,
excluding Darrell's and Bishop's family
and possibly some members of the
Churches Executive Trustees, knew
of these payments, which attached records
from Mrs. Coble's Campaign for Mayor
reveals to be \$27,856.98. (In general
conversation with a friend it was
mentioned, I believe, that Darrell Jackson
and (Bishop) H.C. Jackson and their

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Corporation, Sunrise Enterprise of Columbia, Inc., have received contracts from the City of Columbia (over a period of time I imagine) totaling nearly \$100,000.00. I cannot verify this and have not had the time nor resources as one person to thoroughly evaluate this. There is one person, however, whom I met some years ago, while doing some recruitment work for the Chamber of Commerce, who operates a company somewhat similar to that of Darrell Jackson and H.C. Jackson, Sunrise Enterprise of Columbia, Inc., and who competes for City, State and Federal contracts just as Sunrise Enterprise and the Jacksons do, if subpoenaed, will provide valuable information on the Jackson and Sunrise Enterprise with respect to the aforesaid entities. Mr. William "Bill" Chapman, a former partner in the Jacksons Company, if subpoenaed, will provide the greatest insight, I believe, to the mode of operation of Sunrise and the Jacksons with respect to the entities named above.

With regards to Livola Taylor, who at the time of her candidacy for House of Representative, was a member of Richland County One School Commission along with Darrell Jackson, Bishop Jackson urged the Church congregation to consider her candidacy because she had done much for the Church. though

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I suspected that what they were doing was wrong, I had no legal basis because of my lack of knowledge of this component of the law, to challenge what they were speaking across this Church Pulpit; However, I did inform some of my very close friends on the Churches Executive Trustee Board and other Church Members that I believed Darrell Jackson and A.C. Jackson were violating the Law. Once I found out that Darrell and A.C. Jackson were involved financially involved with the various persons named, I knew for a fact that they had violated some law, even if was only the By-Laws of the Church. (In trying to determine what Livola Taylor may have done for the Church to receive A.C. Jackson's endorsement in our Church service, I again checked with at least two persons in the Church who seemed to think that Darrell Jackson and A.C. Jackson had Livola Taylor to appeal on their behalf and that of the Bibleway Child Development Center to the Richland County Department of Social Services Commission to maintain or have re-instated a grant, maybe Title 20 grant, that had or was about to expire because of possibly structural or

some other violations. I did confront
Darell and A.C. Jackson in February of
1992 regarding Livola Taylor and all
they would say was that the statement
they mentioned regarding Mrs Taylor
was made because she had helped the
Church; Ray Belton, A member of the Executive
Trustees, Sunday School Superintendent locally
and Worldwide in the Bible Way Church
Worldwide Organization, a very close
and best friend I would say, and to a
great extent was forced into the role of
a mediator in my quest to prevent
Darell Jackson and A.C. Jackson from
using their positions as Public Officials, as
Assistant Pastor and Pastor, and the Official
Positions of others to gain financially
or in general gain an unfair Advantage
over others, Was present in this meeting,
one other informal meeting and was
made aware most recently of several
other occasions where Darell Jackson
and A.C. Jackson attempted to dissuade
me, as representatives for Governor Bill
Clinton and his Candidacy, from
pursuing a Federal Civil Rights/Constitutional
Violation Lawsuit and United States
Justice Department Investigation
of the Law firm of, I believe, Mr. Clinton's
South Carolina Chairman, an Assistant
Attorney General of South Carolina and

therefore, the Attorney General's Office,
and other Public Officials because of
the Political Impact The Lawsuit and
Justice Department Investigation Could
Have On The Clinton Campaign. Meryl
Heyward, a Deacon, good friend and
Member of the Executive Trustee of the
Bibleway Church was recently made aware
of the Jackson's attempt to bribe and
dissuade me, because of what appeared to be
purely financial and political reasons.
I may have informed both Mr. Belton,
Mr. Heyward, and Curtis Hamilton, a Deacon
Executive Trustee in this Church and former
head of the Deacons Association of the
Bibleway Church Worldwide, Inc., to some
degree, as well as other Church members,
with regards to the above and with
regards to their attempts to keep this
material from Governor Carroll Campbell
and on the South Carolina Law
Enforcement for an investigation.
(By way of a recent letter with supporting
documents to Lawrence H. Campbell,
Presiding Bishop and Apostle of The
Bibleway Church Worldwide, Inc.,
I have made him aware of Danell
Jackson's and A.C. Jackson's actions,
especially as ordained ministers of the
Gospel. Should you choose to write or call
Mr. Campbell, you can reach him at

151 Grant Street, Danville, Virginia 24541
telephone numbers 1-800-445-0866 or
804-793-9493). Though I have not verified
this, it has been suggested by a Church
friend that Danell Jackson, F.C. Jackson
and their Corporation, Sunrise Enterprise
of Columbia, Inc., were most recently or
are engaged in contract with the Bibleway
Church World Wide Organization. If this
is true, then I am of the belief that
their association would be in the form of
lobbyists or Political Consultants and in
some way tied to the Bill Clinton Campaign
in an unfair fashion or with an Anti-drug
Program similar to Project ADAM referenced
earlier in this document which was operated
through the South Carolina Coalition of
Black Church Leaders, Inc. An examination
of Bill Clinton's Campaign records with
the Federal Elections Commission and
a discussion with the leadership of the
Bibleway Church World Wide Organization,
Plus Ray Belton, Meryl Heyward, Curtis
Hamilton and others may reveal some
valuable information.

In regards to Bishop F.C. James referenced
earlier, video tapes from television stations
suggest that he is a spokesperson for the
Bill Clinton Campaign. The video also

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suggest very strongly and clearly that he as Bishop over the South Carolina District of the A.M.E. Church, Inc., told those persons under his supervision to vote for Bill Clinton in the recent South Carolina Primary. As a matter of fact in an interview made during the day of the primary by WIS. TV, a Black female clearly stated that she voted for Bill Clinton because her Bishop, Fredrick C. James and the NAACP told her to do so. In the other TV interview, following the Jennifer Flowers revelation regarding Bill Clinton, Bishop Fredrick C. James appeared as the spokes person defending Mr. Clinton and berating the news media. An examination of the leadership of the A.M.E. Churches, as well as the membership may reveal further that these religious organizations were and or being used for unfair political and other purposes by individuals named herein. (For your information, my District Civil Action Number is 3:90-1424-01, and my Federal Appeals number in the 4th Circuit Court of Appeals is 91-2273; see select sections of these actions attached, which should be of benefit to this Commission).

Below are some agencies/commissions that Danell E.C. Jackson and their Corporation, Sunrise Enterprise of Columbia, Inc., may have or engaged in contract with: (a) ABC Commission, (b) Lexington/Richland Counties

Alcohol & Drug Abuse Council, (c) South Carolina Educational Television Commission; The Attorney General of South Carolina may be familiar with grants or contracts awarded relating to Drug Abuse.

During my investigation of Darrell Jackson and A. E. Jackson, it was suggested to me that the resumes of my wife, Carrie Williams Bernedette Evans and maybe one other person, who were never employed to my knowledge by the Bible Way Child Development Center, were used improperly to secure some form of Certification and Funding (maybe Title 20 Funding, I am just not sure) via the Richland County Department of Social Services. Although it has been some years, if the honorable Commission decides to pursue my complaint and if it determines that there was some form of Misrepresentation in receiving the Certification or Funding, I will be further devastated because of the fault I placed in these men and their religious institutions. (I have also been informed that Darrell Jackson maybe leaving Sumner on or before May 15, 1992.) Further investigation continuing.

Thank you very much in your consideration of the matter. I look forward to hearing from you soon.

With Kind regards,
Robert Williams

Mr. Baker,

It is being rumored that Danell Jackson is about to break away from Sunrise Enterprise, Inc. because of questionable ethical behavior. He may file amended documents with your Commission after a break-up is consummated, if the rumors are true. Heyward Barnister and A.C. Jackson Partners in Sunrise, (Heyward a lobbyist, at least registered with the House of Representatives, at this late in 1991, and A.C. Jackson a Public official serving on the Department of Social Services (Richland County Board/Commission)), if they haven't already, may file amended disclosures and or Economic Interest statements. The actors of Bishop F.C. James as indicated in the 17 page document to you, may require him to file, I am not sure and ask your opinion on this.

SECRETARY OF STATE
ARTICLES OF INCORPORATION
OF

Sunrise Enterprise of Columbia, Inc.

(File this Form in
Duplicate Originals)

(§33-7-30 of 1976 Code)



This Space for Use
by
Secretary of State

REC-417665/80-017665-17
12 04 10 PM 1968
SECRET OF STATE OF SOUTH CAROLINA

1. The name of the proposed corporation is Sunrise Enterprise of Columbia, Inc.

2. The initial registered office of the corporation is 1111 Belview Street, Suite 103

Columbia Richland S. C. 29204

and the initial registered agent at such address is William J. Chapman

3. The period of duration of the corporation shall be perpetual (perpetual years).

4. The corporation is authorized to issue shares of stock as follows:

Class of Shares	Authorized No. of Each Class	Par Value
<u>Common</u>	<u>100,000</u>	<u>1.00</u>

If shares are divided into two or more classes or if any class of shares is divided into series within a class, the relative rights, preferences, and limitations of the shares of each class, and of each series within a class, are as follows:

Not applicable

5. Total authorized capital stock is 100,000

6. The existence of the corporation shall begin as of the filing date with the Secretary of State or to be effective immediately

7. The number of directors constituting the initial board of directors of the corporation is four (4), and the names and addresses of the persons who are to serve as directors until the first annual meeting of shareholders or until their successors be elected and qualify are as follows:

(a) <u>Raymond Barnister</u>	<u>1120 Oconee St., Columbia, S. C. 29201</u>
(b) <u>William J. Chapman</u>	<u>21 Broadmore St., Columbia, S. C. 29203</u>
(c) <u>Darrell Jackson</u>	<u>2936 Dall Drive, Columbia, S. C. 29203</u>
(d) <u>A. C. Jackson</u>	<u>2932 Dall Drive, Columbia, S. C. 29203</u>

8. The general nature of the business for which the corporation is organized is as follows: (It is not necessary to set forth the powers enumerated in §33-3-10 of 1976 Code)

See attached sheet

9. Provisions which the incorporators elect to include in the articles of incorporation are as follows: (Attach additional sheet(s) if necessary)

See attached sheet

- A. To sell, rent and invest in property, wheresoever situate and of wh soever kind, and to provide a other lawful business and ea nity services.
- B. To clean and provide janitorial services for industrial, commercial and private individuals, construct, fabricate, refurbish, reconstruct, modify, alter, improve, or dismantle buildings and structures of all kinds, to sell at wholesale and retail and otherwise deal in materials and equipment and products, including but not limited to, buildings and homes, and other dwellings, condominiums, apartments of every description and to provide services with respect to the foregoing and to otherwise transact any and all lawful business incidental thereto, associated therewith, or otherwise considered by the corporation to be necessary or desirable.
- C. To purchase, acquire, hold, improve, manage, sell, convey, assign, exchange, encumber, hire, lease, release, mortgage and deal in real and personal property of every kind, description and character.
- To apply for, purchase, or acquire by assignment, transfer or otherwise to hold, mortgage or otherwise pledge, and to sell, exchange, transfer, deal in and with any license power, authority, concession, right of privilege which any corporation may make or grant.
- D. To endorse, lend its credit, or otherwise guarantee, or obligate itself for, or pledge or mortgage all or any part of its properties for the payment of the principle and interest, or either, on any bonds, debentures, notes, coupons, script or other obligations or evidence of indebtedness, or the performance of any contract, mortgage or obligation, of any other corporation, association, domestic, or foreign, or of any person, firm, partnership or joint venture.
- E. To enter into, make and perform contracts of every kind for any lawful purpose without limit as to amount, with any person, firm, association, corporation, municipality, county, state, territory, government, governmental subdivision or body politic.
- F. To acquire the good will, assets, properties and rights, and to undertake the whole or any part of the liabilities of any person, firm, business entity, association or corporation, to pay for the same in cash, the stock or other securities of the corporation, or otherwise; to hold or in any manner dispose of the whole or any part of the businesses, properties, or establishments so acquired and to exercise all the powers necessary or convenient in and about the conduct and lawful management of any such business.
- G. To borrow and lend money, without security, or upon the giving or receipt of such security of the Board of Directors of the corporation may deem advisable by the way of pledge, mortgage, assignment or otherwise, of real and personal property of every nature and description, or by way of guaranty or otherwise.
- H. To enter into any plan or project for the assistance of its employees.
- I. To enter into any lawful arrangement for sharing of profits, union of interest, reciprocal concession or corporation, as partners (general or limited), joint ventures, or otherwise, with any person, partnership, corporation, association combination, organization, entity, or other body whatsoever, domestic or foreign, carrying on or proposing to carry on any business which this organization is authorized to carry on, or any business or transaction deemed necessary, convenient or incidental to the carrying out of any of the objectives of this corporation.
- J. To have one or more offices to carry on all of its operations and business without restriction or limit as to amount, in any states, districts, territories, or possessions or colonies of the United States, and in any and all foreign countries, subject to the law of such state, and in any and all foreign countries, subject to the law of such states, districts, territory, possession, or country.

- K. To act as jobber, agent or broker in buying, selling and dealing in real and personal property of every nature and description and leases respecting the same and estates and interest therein and mortgages and securities thereon, in making and obtaining loans, whether secured by such property or not, and supervising, managing and protecting such property and loans and all interest in and claims affecting the same.
9. Shareholder(s) may enter into an agreement to operate the corporation as if it were a partnership pursuant to Code Section 33-11-220 under the laws of South Carolina.

10. The name and address of each incorporator is as follows:

Name	Street & Box No.	City	County	State
(a) <u>Howard Bannister</u>	<u>1120 George Street</u>	<u>Columbia</u>	<u>Richland</u>	<u>SC</u>
(b) <u>William J. Chapman</u>	<u>Broadmore Street</u>	<u>Columbia</u>	<u>Richland</u>	<u>SC</u>
(c) <u>Darrell Jackson</u>	<u>2936 Dell Drive</u>	<u>Columbia</u>	<u>Richland</u>	<u>SC</u>
(d) <u>A. C. Jackson</u>	<u>2932 Dell Drive</u>	<u>Columbia</u>	<u>Richland</u>	<u>SC</u>

<u>Howard Bannister</u> Type or Print Name	<u>Howard Bannister</u> Type or Print Name
<u>William J. Chapman</u> Type or Print Name	<u>William J. Chapman</u> Type or Print Name
<u>Darrell Jackson</u> Type or Print Name	<u>Darrell Jackson</u> Type or Print Name
<u>A. C. Jackson</u> Type or Print Name	<u>A. C. Jackson</u> Type or Print Name

Date: December 4, 1986

STATE OF South Carolina
COUNTY OF Richland

The undersigned Howard Bannister, William J. Chapman, Darrell Jackson & A. C. Jackson do hereby certify that they are the incorporators of Surprise Enterprise of Columbia, Inc. Corporation and are authorized to execute this verification; that each of the undersigned does hereby certify that he or she has read the foregoing document, understands the meaning and purport of the statements therein contained and the same are true to the best of his or her information and belief.

<u>Howard Bannister</u> Type or Print Name	<u>Darrell Jackson</u> Type or Print Name
<u>William J. Chapman</u> Type or Print Name	<u>A. C. Jackson</u> Type or Print Name

CERTIFICATE OF ATTORNEY

Law Offices of E. W. Cromartie
I, Dr. Susan G. Williams, an attorney licensed to practice in the State of South Carolina, certify that the corporation, to whose articles of incorporation this certificate is attached, has complied with the requirements of Chapter 7 of Title 33 of the Code of Laws of South Carolina (1976) relating to the organization of corporations, and that in my opinion, the corporation is organized for a lawful purpose.

Date: December 4, 1986

Law Offices of E. W. Cromartie

By: Susan G. Williams
Type or Print Name

Susan G. Williams, Esquire
Type or Print Name

P. O. Box 8417, 1926 Hampton Street
Address

Columbia, S. C. 29202
City State Zip

SCHEDULE OF FEES

(Payable at time of filing Articles with Secretary of State)

Fee for Filing Articles

In addition to the above, \$40 for each
\$1,000.00 of the aggregate value of
shares which the corporation is author-
ized to issue, but in no case less than
one share

\$ 5.00

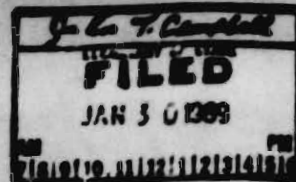
40.00

1,000.00

NOTE THIS FORM MUST BE COMPLETED IN ITS ENTIRETY BEFORE IT WILL BE ACCEPTED FOR FILING
THIS FORM MUST BE ACCOMPANIED BY THE FIRST REPORT OF CORPORATIONS AND A CHECK IN THE
AMOUNT OF \$10.00 PAYABLE TO THE SOUTH CAROLINA TAX COMMISSION

8617665

STATE OF SOUTH CAROLINA
SECRETARY OF STATE



NOTICE OF CHANGE OF REGISTERED OFFICE
OR REGISTERED AGENT OR BOTH
OF A SOUTH CAROLINA
OR FOREIGN CORPORATION

JAN 01/02 4975
IF-001444/IF-001444 00-48-00 012
01-20-07 FWT 120.00
SECT OF STATE OF SOUTH CAROLINA

Pursuant to §§33-6-102 and 33-15-108 of the 1976 South Carolina Code, as amended, the under-
signed corporation submits the following information.

1. The name of the corporation is Starline Enterprise of Columbia, Inc.
2. The corporation is (complete either a or b, whichever is applicable):
 a. a domestic corporation incorporated in South Carolina on Dec. 4, 1986; or
 b. a foreign corporation incorporated in _____ on _____ and
 authorized to do business in South Carolina on _____
(Date) (Date)
3. The street address of the current registered office in South Carolina is 1107 Bellevue St.
(Street & Number)
 in the city of Columbia, South Carolina 29201
(Zip Code)
4. If the current registered office is to be changed, the street address to which its registered office
 is to be changed is _____ in the city of _____ South Carolina _____
(Street & Number) (Zip Code)
5. The name of the present registered agent is William J. Chapman
6. If the current registered agent is to be changed, the name of the successor registered agent is
Raynard Bannister
 *I hereby consent to the appointment as registered agent of the corporation:

Raynard Bannister
(Signature of New Registered Agent)

7. The address of the registered office and the address of the business office of the registered agent,
 as changed, will be identical.
8. Unless a delayed date is specified, this application will be effective upon acceptance for filing
 by the Secretary of State (See §33-1-230(b)): _____

* Pursuant to §§33-6-102(5) and 33-15-108(5), the written consent of the registered agent may be
 attached to this form.

The State of South Carolina

EXECUTIVE DEPARTMENT

CERTIFICATE OF INCORPORATION BY THE SECRETARY OF STATE

WHEREAS, Bishop F. C. James, Post Office Box 4837, Columbia, SC
Bishop A. C. Jackson, 2932 Dell Drive, Columbia, SC

two or more of the officers or agents appointed to supervise or manage the affairs of

THE SOUTH CAROLINA COALITION OF BLACK CHURCH LEADERS, INC.

which has been duly and regularly organized, did on the 15th day of July, A. D. 19 87, file with Secretary of State a written declaration setting forth:

That, at a meeting of the aforesaid organization held pursuant to the by-laws or regulations of the said organization, they were authorized and directed to apply for incorporation.

That, the said organization holds, or desires to hold property in common for Religious, Educational, Social, Fraternal, Charitable or other eleemosynary purpose, or any two or more of said purposes, and is not organized for the purpose of profit or gain to the members, otherwise than is above stated, nor for the insurance of life, health, accident or property, and that three days' notice in the Star Reporter, a newspaper published in the County of Richland, has been given that the aforesaid Declaration would be filed.

And WHEREAS, Said Declarants and Petitioners further declared and affirmed:

FIRST: Their names and residences are as above given.

SECOND: The name of the proposed Corporation is THE SOUTH CAROLINA COALITION OF BLACK CHURCH LEADERS, INC.

THIRD: The place at which it proposes to have its headquarters or be located is 3700 Forest Drive (P.O. Box 4837, Columbia) Forest Acres, SC

FOURTH: The purpose of the said proposed Corporation is the purpose of the proposed corporation is to establish and operate various projects that will promote the social welfare of South Carolina. The Coalition is organized for the promotion of social welfare, substantially all of its activities shall be for such purposes, and no part of the net earnings of the corporation shall inure to the benefit of any member. It is intended that the corporation be organized and operated in such a manner that it shall qualify as a non-profit corporation within the meaning of section 501(c)(4) of the Internal Revenue Code of 1986 or the corresponding provision of any future United States Internal Revenue law.

Notwithstanding any other provision of this Charter, the corporation shall not carry on any other activities not permitted to be carried on by an organization exempt from federal income tax under section 501(c)(7) of the Internal Revenue Code of 1986 or the corresponding provision of any future United States Internal Revenue law.

FIFTH: The names and residences of all Managers, Trustees, Directors or other officers are as follows:

Bishop F. C. James	P. O. Box 4837, Columbia, SC	Director
Rev. S. C. Cureton	2336 Elmwood Ave., Columbia, SC	Director
Bishop A. C. Jackson	2932 Dell Dr., Columbia, SC	Director
Rev. J. O. Rich	2336 Elmwood Ave., Columbia, SC	Director

SIXTH: That they desire to be incorporated in perpetuity

Now, Therefore, I, JOHN T. CAMPBELL, Secretary of State, by virtue of the authority in me vested, by Chapter 31, Title 33, Code of 1976 and Acts amendatory thereto, do hereby declare the said organization to be a body politic and corporate with all the rights, powers, privileges and immunities, and subject to all the limitations and liabilities, conferred by said Chapter 31, Title 33, Code of 1976 and Acts amendatory thereto.

GIVEN under my hand and the seal of the State, at Columbia, this 15th day of July, 1987 and in the two hundred and twenty-fifth year of the Independence of the United States of America.

JOHN T. CAMPBELL,
Secretary of State

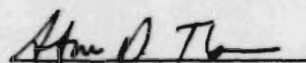
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STATE OF SOUTH CAROLINA
RICHLAND COUNTY

THIS IS TO CERTIFY THAT This and/or the attached is
a true and accurate copy of Certificate of Incorporation
for The South Carolina Coalition of Black Church Leaders, Inc.
recorded in Records of the Secretary of State Corporation
Charter Division, Eleemosynary Charter #23060, 15 July 1987
now on deposit with South Carolina Department of
Archives and History

GIVEN UNDER MY HAND AND THE SEAL OF THE DEPARTMENT
This twentieth day of April, Nineteen Hundred Ninety-two.


Steven D. Tuttle, Supervisor
Reference Services

G. Lee Williams
104 Mc Neely Rd.
Columbia, SC 29223

May 4, 1992

The Honorable Chief Robert Stewart
South Carolina Law Enforcement Division
P.O. Box 125
Columbia, SC 29214

Dear Chief Stewart:

Re: Request for SLED Investigation of
the Contents of Enclosed District
Court Action 3:90-1424-OH, Appeals
Court Action 91-2173 (Robert Lee
Williams vs C. Errol Catoe, et al)
and Contents of Seventeen Page Letter
to the Honorable Gary Baker of
the Ethics Commission Dated
May 4, 1992

Herewith enclosed please find the documents
referenced. Also enclosed is my original
letter to the Office of Governor Campbell,
a response letter from Mr. Mark R.
Elam, Senior Counsel to the Governor, on
the Governor's behalf and a most recent
letter from the United States Justice

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Department.

By way of a copy of this letter to US Attorney General William Barr, along with some other information not presented to him previously, I am asking him to re-evaluate certain components of my Complaint with respect to Darrell Jackson, A.C. Jackson, their financial involvement with the Bill Clinton Campaign and their various attempts as my Assistant Pastor and Pastor, respectively, to bribe and to sinade me from pursuing my Federal Lawsuit, the Justice Department investigation, because of the impact such lawsuit and Justice Department investigation could have on the Clinton Campaign if ever made public because a law firm and therefore an individual named in the lawsuit and investigation is Clinton's South Carolina Campaign Chairman. I am also asking the US Attorney General to investigate and determine whether Darrell Jackson, A.C. Jackson and Bishop F.C. James and or others, through Family National Coalition of Black Churches and Anti-drug Projects, such as Project FIDAM as addressed in my seventeen page document dated 7/1/92, 4, 1992 and managed by Sunrise Envision,

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have violated Section 501(c)(4) of
the Internal Revenue Code of 1986.

Also by way of a copy of this letter,
I am making my request known
to the other following Agencies for
appropriate investigations for possible
violations: (1) The South Carolina Elections
Commission; (2) the Internal Revenue
Service; (3) Solicitor Richard Harpootlian;
(4) The Federal Elections Commission;
(5) Jim Mills, Secretary of State for
South Carolina.

Should you need to talk to me,
Please call me at 788-5494 or
748-3254 (work).

Thank you so very much for taking
the time to consider the matter.

With kind regards
Robert Williams

Robert Williams
1104 Mc Neely Rd
Columbia, SC 29223

May 5, 1992

The Honorable Richard Harpoothian
Solicitor of the 5th Circuit
1701 Main Street
Columbia, SC 29201

Dear Mr. Harpoothian:

Please examine the attached materials
and Case file and provide advice
to me and my family as to how you and we are to proceed.

Please see especially the letter from
Governor Campbell's Senior Legal
Counsel. Call me at 748-3254 or 788-5494
should you have a question.

Sincerely,

Robert Williams

PS I agree that I still feel that justice has
escaped me. It appears that many have conspired
against me and my family, especially Bishop A.C.
Jackson and Darrell Jackson, my former pastor and
assistant pastor, who through apparent spiritual counsel
attempted to obstruct justice by trying to dissuade and
keep me from pursuing Federal and State actions.

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93040960141

Mr. Harpothan, I so sincerely want
you pursue prosecution, if at all possible,
of as many persons and entities named
herein, especially Darrell Jackson, A.C.
Jackson and the Bill Clinton Campaign
for what they have done and attempted
to do to our family and me. Again,
during our most vulnerable period when
they should have been providing spiritual
counseling to us, they exploited me, pressing
me beyond measure, in anger at times,
and with statements such as, these people have
a lot of money and power and could
cause harm to you and your family if
you are not careful, not to pursue my
case in the Federal Courts, the United States
Justice Department, through SLED and
the Governor's Office, because of the
Political Impact This Could Have On
The Bill Clinton Campaign For President,
If Revealed To The Public That A
South Carolina Campaign Chairman, Is
Involved Or Named In A Federal Law-
Suit And Justice Department Investigation.
Had They Informed Me Before hand that
they, as Ordained ministers, Public Officials,
Assistant Pastor and Pastor Of The Billyway
Church Of Hllas, Executive Directors of
The South Carolina Coalition Of Black Church

93040960142
Leaders, Inc. and Project ADAM (Dwight Jackson), Chairman and or Co-Chairman of The South Carolina Coalition of Black Church Leaders, Inc. and Project ADAM (A.C. Jackson), were being paid by Bill Clinton and therefore, consequently have, at least, an indirect financial relationship, if not a direct financial relationship with an entity or entities named in My Lawsuit and Justice Department Investigation, I would not have had opposed to them anything.

I must and am requesting a Major investigation by The Federal Elections Commission and The Justice Department Investigation, as well as the other investigations stated throughout documents.

I believe that the Jacksons, their Corporation, Sunrise Enterprise of Columbia, Inc., The Bill Clinton Campaign have assisted in obstructing justice and violating My Civil Rights.

23040960143

Barth Williams
104 McNeely Road
Columbia, SC 29223

May 7, 1992

Mr. Donald L. Breihan
District Director
Internal Revenue Service
1835 Assembly Street MDP-01
Columbia, SC 29201

Dear Mr. Breihan:

Re: Request For Investigation of Possible
Violation of Section 501(c)(4) of the
Internal Revenue Code of 1986 by
the South Carolina Coalition of Black
Church Leaders, Inc. (Project ADAM)

Please commence an investigation of the
referenced and the particular persons named
in the Seventeen Page document enclosed,
commencing particularly at page 3. Other
documents are included for your information.

I have addressed this Mr. William Barr, U.S.
Attorney General in a letter just written
as well as other agencies cited in the
various documents attached.

I have been informed that Reginald Jackson
is or maybe attempting to distance himself
from Sunrise Enterprise of Columbia, Inc.,
because of possible questionable unethical
behavior with the referenced.

Should you have a question, please call me
at 788-5494 or 748-3254.

Sincerely,

Robert Williams

93040960144

Robert Williams
104 McTeely Rd
Columbia, SC 29223

May 5, 1992

The Honorable James M. Miles
Secretary of State
Wade Hampton Office Bldg
Box 11350
Columbia, SC 29211

Dear Mr. Miles:

Re: Investigation to Determine if the
Coalition of Black Church Leaders
and Project ADAM Violated Charter
for Religious/Non-Profit Organizations

Included within the enclosed information
is my reason for requesting the investigation

Please see correspondence to Chief Robert
Stewart of S.C.E.D.

Call me at 748-3254 or 788-5494 should
you have a question.

Sincerely
Robert Williams

Dr. J. Williams
104 McNeely Rd.
Columbia, SC 29223

May 5, 1992

The Honorable E. Gregorie Frampton
Executive Director
South Carolina Tax Commission
Columbia Mills Bldg.
301 Hewais
Box 125
Columbia, SC 29214

Dear Mr. Frampton:

Re: Investigation of Possible Grant/Tax
Exemption Violation of The Coalition
of Black Leaders of South Carolina,
Inc./Project ADFAM

Included within the enclosed information
is my reason for requesting this
investigation.

Please see Correspondence to Chief Robert
Stewart of SLEP.

Call me at 748-3254 or 788-5494 should
you have a question

Sincerely,
Robert Williams

93040960146

Bob + Williams
104 M. Neely Rd
Columbia, SC 29223
Tel # (803) 788-5494
March 9, 1992

Dear Governor Campbell

I respectfully request that a SLED investigation Commence as soon as possible regarding the contents of the enclosed documents. If at all possible, I request that persons independent of the State Attorney General's Office, including the Attorney General himself, Mr. Medlock, be used to work with SLED. You will see why I am asking this as you review the materials in this case. There appears to have been a major conspiracy with persons primarily related to the Democratic Party.

I and my family are Black People and we have always believed in the proper Administration of justice. We have received threats and intimidating telephone calls since we started pursuing justice. The Attorney General, the Legislative Black Caucus, the Senate Judiciary Committee, the Coalition of Black Churches

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the NAACP, all have been informed in writing of our plight and for all practical purpose, none have responded. In regards to a letter from Mr. Marshall Williams, it appears as if he is trying to get me to drop the matter. The refusal of the Legislative Black Caucus and the NAACP to forcefully speak against the Civil Rights or Constitutional Rights maybe because I am suing a Black Assistant Attorney ^{General} Alice Broadwater.

As a Black Ordained Minister, formerly with the Bibleway Church of Atlas Rd and the Bibleway Church World Wide incorporated, until forced out recently by the deplorable act of Darrell Jackson, Assistant Pastor and Bishop A.C. Jackson, Pastor, do not take racial sides when it comes to the administration of justice. Bishop Jackson, and especially Darrell Jackson both of whom are receiving huge sums of money from Bill Clinton Campaign, have spoken to me on several occasions to try and prevent me from continuing pursuit of this matter through Federal Court, the

93040960149
United States Justice Department and
through your Office, because of the
Political impact it could have
~~had~~ on the current Campaign.
They are receiving this money through
Sunrise Incorporated; they may have
attempted most recently to divert
the money since they may have fears
that I will expose them through
this company and their association with
Project ADAM & the Coalition ^{of Black churches}; the
Project or Coalition have violated what
they were designed for or should have
been designed for and are being used
by the Jackson's and the Bill Clinton
Organization for solely Democratic
political means, and more importantly
to exclude other Democratic Presidential
Candidates from competing against
Bill Clinton.

I would also respectfully request
that SLED investigate the Bible Way
Child Care Development Center. It
appears that the original awarding
of the contract some years back was

base upon some misrepresentation. It appears from what I have been told that some of the resumes that were used to get the Contract, these qualified persons were never hired. Not only that, I was informed that the DSS Contract was terminated recently either because the facilities did not and still do not I believe meet State requirements, and that Darrell Jackson, especially, and Bishop A.C. Jackson contacted Lavola Taylor, House Member, who interceded improperly, I believe, to have the Contract with DSS reinstated. Please also investigate funds, that I have been informed, funneled through the Attorney General's Office to "Just Say No" and or through Project AIDAM, possibly via Sunrise Incorporated which maybe political payoffs.

I believe that Bibleway Church of Atlas Rd, primarily through the influence of Darrell Jackson, former political Director of the Democratic Party, have made

Contributions in the form of money to
a former Political National Candidate.

Governor Campbell, I am a just and
honest ^{man} and for the sake of the
integrity of the Church as an
institution, and to expose to my people
and all of God's people truth, I
make my request.

93040960151
PS The Charleott Observer has been
running a series on Mr. Medlock
for maybe the past two months. I
did not give them this information
and am not exactly sure if it came
from an associate or from someone
familiar with this matter in the Court
system.

Thank you very kindly for your time
and please keep up the excellent
job that you are doing

Sincerely,

Robert Williams



State of South Carolina

CARROLL A. CAMPBELL, JR.
GOVERNOR

Office of the Governor

Post Office Box 11369
COLUMBIA 29211

April 15, 1992

Mr. Robert Williams
104 McNeely Road
Columbia, South Carolina 29223

Dear Mr. Williams:

The Governor has received your letter and the accompanying information. The Governor has asked that I respond on his behalf and I do apologize for the delay.

As my law clerk, Mr. Covert, discussed with you, the Governor does not have the ability to conduct investigations. Therefore, I would encourage you to submit your information to the South Carolina Law Enforcement Division (SLED) for their review. SLED would be the most appropriate agency to investigate your claims. You also may wish to contact your local Solicitor and seek his advice. I would remind you that neither of these agencies are required to investigate any allegations, they have complete discretion as to what cases they will or will not investigate. As for your claims about the Clinton Campaign, the South Carolina Election Commission would certainly be interested in any proof of your allegations that you could offer.

Again, thank you for taking the time to share your information with the Governor. If I may be of any assistance to you in the future, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Mark Elam".

Mark R. Elam
Senior Counsel to the Governor

MRE/wtc

23040960152



U.S. Department of Justice

Civil Rights Division

Washington, D.C. 20530

JRD:PLF:mlw
DJ 144-67-0

09 MAR 1992

Mr. Robert Lee Williams
104 McNeely Road
Columbia, SC 29223

Dear Mr. Williams

This is a response to your complaint that you have been deprived of your civil rights.

We have carefully reviewed the information which you furnished. However, we have concluded that there is no prosecutable violation of federal criminal civil rights statutes. Accordingly, we are unable to assist you.

You may wish to contact the nearest legal aid program or the local bar association to determine whether they may be able to assist her.

Sincerely,

John R. Dunne
Assistant Attorney General
Civil Rights Division

By:


Peggy L. Fong
Paralegal Specialist
Criminal Section

93040960153

STATE ETHICS COMMISSION

STATEMENT OF ECONOMIC INTERESTS FORM

TYPE OR PRINT
LEGIBLY

Disclosure for Calendar Year 19 - Annual Update Due April 15

01 Have you previously filed a Statement of Economic Interests? ☐ Yes ☒ No 02 Social Security or Identification Number 250-11-4857
03 Name: ☒ Mr. ☐ Mrs. ☐ Ms. ☐ Dr. 04 County of Richland
☐ Jackson, Darrell Residence Richland
(last) (first) (middle initial)

05 Home Mailing Address
2936 Dell Drive
Columbia, SC 29209

06 Business or Government Address
P.O. Box 3076
1215 Anthony Ave.
Columbia, SC 29201
Workplace Telephone Number (803) 771-0325

07 Status
☐ Candidate ☒ Elected
☐ Appointed ☐ Employee
☐ Employee-Regulated Business Association
☐ Consultant

08 Position Title(s) and Agency(s):
Current: (a) Commissioner, Rich. Dist. 1
(b) _____
Sought: (c) _____

09 Date of Hire or Appointment _____
mo./yr.

11 Candidates Only:
Date filed as a candidate: _____
mo./day/yr

10 Term(s) of Office:
Current 11/90 / 11/92
mo./yr. mo./yr.
Term Sought _____
mo./yr. mo./yr.

Election Date(s):
Primary _____
mo./day/yr.
General _____
mo./day/yr.
Special _____
mo./day/yr.

12 CERTIFICATION

I have examined the information I have disclosed herein and certify that the disclosures are true, correct, and complete to the best of my knowledge and belief.

FOR OFFICE USE ONLY

☒ COMPLETE MC
☐ INCOMPLETE
☐ ENTERED APR 15 1992

RECEIVED
APR 10 1992
STATE ETHICS
COMMISSION

(SIGNATURE)

(DATE)

Two copies of this page and the succeeding pages must be completed and returned to the appropriate supervisory office prior to the deadline. This form will be returned if all items are not properly completed and/or the form is not signed.

SEIC-5 (Rev. 11-91)

Items 13-23 must include some response. If not applicable, so state for each item.

13 INCOME AND BENEFITS

Income, fees, payments, or additional benefits exceeding \$500 in aggregate received by yourself or a member of your immediate family from state and local public agencies in South Carolina. Identify the source and type of such income or benefits as well as the amount or value.

☒ Not applicable

SOURCE	TYPE	AMOUNT/VALUE

14 REGULATED BUSINESS ASSOCIATIONS

Identify the name of each business with which you are associated which is regulated by the agency with which you are associated or for which you are a candidate. Identify each regulated business, your relationship to that business, and the regulatory involvement by your agency with that business.

☒ Not Applicable

NAME OF BUSINESS	RELATIONSHIP	SOURCE OF REGULATORY INVOLVEMENT

15 REAL ESTATE INTERESTS

Describe any interest by you or a member of your immediate family in property, its location, and present market value (a) where is a potential conflict of interests, (b) if there have been public improvements to this or adjoining property of \$200 or more, or (c) if the property has been sold, leased, or rented to a state or local public agency in South Carolina. Identify the nature of the potential conflict of interests and the nature and value of any public improvements. Identify any state or local public agency in South Carolina which has purchased or is leasing or renting such property. Attach a copy of the contract or agreement.

☒ Not Applicable

DESCRIPTION	VALUE	LOCATION

NATURE AND VALUE OF IMPROVEMENT(S): _____

NATURE OF POTENTIAL CONFLICT OF INTERESTS: _____

AGENCY PURCHASING, LEASING, OR RENTING THE PROPERTY: _____

93040960155

STATEMENT OF ECONOMIC INTERESTS

Page 3

16 PERSONAL PROPERTY

Identify personal property interests by you or a member of your immediate family sold, leased, or rented to state and local public agencies in South Carolina. Identify the property, its amount or value, and the name of the agency. Attach a copy of the contract or agreement.

☒ Not Applicable

NATURE OF PROPERTY	NAME OF AGENCY	AMOUNT/VALUE

17 BUSINESS INTERESTS

Identify every business or entity in which you or a member of your immediate family hold or control, in the aggregate, securities or interests constituting five percent or more of the total issued and outstanding securities and interests and constituting a value of more than one hundred thousand dollars. Identify the business and your relationship to that business.

☐ Not Applicable

NAME OF BUSINESS	RELATIONSHIP
<u>Sunrise Enterprise of Columbia Inc.</u>	<u>Partner</u>

18 CREDITORS

Identify by name and address any creditor to whom you or a member of your immediate family owed a debt in excess of \$500 at any time during the prior calendar year, including the original amount and outstanding amount. Disclose the name and address of the creditor(s) and the rate of interest being paid. Debts to financial institutions, credit card balances and retail installment contracts are not included. Debts from family members are generally not included (see instructions).

☒ Not Applicable

NAME AND ADDRESS OF CREDITOR(S)	RATE OF INTEREST	ORIGINAL AMOUNT	OUTSTANDING AMOUNT

19 LOBBYISTS

(a) Lobbyist Relationship: Identify any lobbyist who is a member of your immediate family or with whom you or a member of your immediate family is associated in business and your relationship to that lobbyist. (b) Identify any lobbyist or lobbyist principal who has purchased goods or services from you, a member of your household, or an individual or business with which you are associated in excess of \$200. Identify the goods or services purchased, the amount as well as whom such goods or services were purchased from, and your relationship.

☒ Not Applicable

NAME OF LOBBYIST	RELATIONSHIP OR ASSOCIATION

NAME OF LOBBYIST	GOODS OR SERVICES PURCHASED	AMOUNT	PURCHASED FROM	RELATIONSHIP

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STATEMENT OF ECONOMIC INTERESTS

Page 4

20 GOVERNMENT CONTRACTS

Identify any compensation paid to you by an individual or business which contracts with the public agency with which you are associated. Disclose the name and address of the contractor and your relationship to such contractor. Identify the agency contracted with and the nature of such contract. Disclose the amount of compensation paid to you by the contractor.

☒ Not Applicable

NAME AND ADDRESS OF CONTRACTOR	RELATIONSHIP	NATURE OF CONTRACT	AMOUNT	AGENCY CONTRACTED WITH

21 GIFTS

Identify all gifts, including transportation, lodging, food, or entertainment, given as a result of your public position, or if given by some one seeking a contractual or business relationship with your agency, or if the donor's activities are regulated by your agency and exceed, in the aggregate, more than twenty-five dollars (\$25) in one day or two hundred dollars (\$200) during the calendar year. Identify the type or nature of the gift, its value, and the donor and the donor's relationship to you.

☒ Not Applicable

NATURE OF GIFT	VALUE	DONOR	RELATIONSHIP

22 CONSULTANTS ONLY

Identify all consultant agreements with state and local public agencies in South Carolina. Identify the agency with which you are engaged as a consultant and your consulting relationship to that agency. Disclose the recipient of any contract awarded by you and your relationship to the business receiving such contract.

☒ Not Applicable

AGENCY	RELATIONSHIP	CONTRACT AWARDED TO	RELATIONSHIP TO BUSINESS RECEIVING CONTRACT

23 MEMBERS OF AND CANDIDATES FOR THE GENERAL ASSEMBLY ONLY

Identify representations for compensation of another person before any governmental entity by yourself, an individual with whom you are associated, or a business with which you are associated. Do not include matters (a) required by law, (b) before a court under the unified judicial system, or contested cases as defined in Section 1-23-310. Identify the person(s) represented, the nature of the services rendered, the nature of any contracts made with governmental agencies, and any fees earned as a result of such representation.

☒ Not Applicable

PERSON REPRESENTED	SERVICES RENDERED	NATURE OF CONTACT MADE WITH GOVERNMENT AGENCIES	FEES EARNED

93040960157

(11)

Jackson Daniel

When is the date April 15
02 Social Security or
Identification Number 504-4857
04 County of
Residence Richmond
07 Partition
2936 Dell Dr. Columbia SC 29209

☒ Candidate ☐ Contest
Candidate's Name
Candidate's Address

Sought in Richland County Court 1

11 CANDIDATES

Date Filed as a Candidate 3 16 88

Election Date Primary 6 14 88

General 11 8 88 Special

Amount of Filing Fee \$ 550.00

I have not made any further campaign expenses
I certify on this return I will not be required to file further
I have not received any other contributions and I have not made any other contributions

12 Name of Source

13 Date of Birth

14 Date of Appointment

15 Terms

0324206

12 Name of Source from the agencies identified in item (8) above identify source

13 Name of Source from the agencies identified in item (8) above identify source

14 Name of Source from the agencies identified in item (8) above identify source

15 Name of Source from the agencies identified in item (8) above identify source

16 Name of Source from the agencies identified in item (8) above identify source

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41 Name of Source from the agencies identified in item (8) above identify source

42 Name of Source from the agencies identified in item (8) above identify source

43 Name of Source from the agencies identified in item (8) above identify source

44 Name of Source from the agencies identified in item (8) above identify source

I have signed this statement and have declared that the disclosures are true, correct and complete to the best of my knowledge.

Daniel Jackson
3/16/88

CAMPAIGN DISCLOSURE FORM

PART I

01 TYPE OF REPORT: ☐ 30 Day ☐ Update 02 Social Security or Identification Number _____

03 NAME OF CANDIDATE AND/OR COMMITTEE _____
(LAST) (FIRST) (MIDDLE)

04 CANDIDATE'S COUNTY OF RESIDENCE _____

05 Mailing Address _____
(STREET) (CITY) (STATE) (ZIP CODE)

06 POSITION SOUGHT _____ 07 AGENCY _____

08 TYPE OF ELECTION: ☐ Primary ☐ General ☐ Special 09 DATE OF ELECTION ____/____/____
☐ Runoff ☐ Convention or Caucus Successful? Yes _____ No _____

10 Other Reporting Period From: ____/____/____ to: ____/____/____

SUMMARY OF RECEIPTS AND EXPENDITURES

10 RECEIPTS (contributions)	UNITIZED (contributions of \$100 or less)	ITEMIZED (contributions of more than \$100 (itemize on Schedule A))	TOTAL
A. Cash (from Personal Funds)			
B. Individual Contributions			
C. In-kind contributions			
D. Other Receipts			
E. Receipts Subtotal			
F. Loans Repaid (Schedule C Sec. 1)			
G. Less Loan Repayments (Schedule C Sec. 2)			
H. TOTAL RECEIPTS			

11 EXPENDITURES (All expenditures must be itemized on Schedule B)	TOTAL
A. Filing Fee	
B. In-kind Expenditures (itemize on Schedule B)	
C. Other Expenditures (itemize on Schedule B)	955.37 39
D. TOTAL EXPENDITURES (itemize on Schedule B)	442.57 49

12 BALANCE OF CONTRIBUTIONS

A. Contributions on Hand (Beginning of Reporting Period) _____

B. Total Receipts (10. H. above) (+) _____

C. Total Expenditures (11. D. above) (-) 482.37 29

D. Contributions on Hand (End of Reporting Period) (-) 839.41 29

13 State the ultimate use of the contributions on hand (12. D. above) _____

14 CERTIFICATION: I have examined this report and certify, to the best of my knowledge and belief, it is true, correct and complete.

(DATE)

(SIGNATURE)
 TAMM L HOUSE Campaign Manager
(NAME AND TITLE OF PERSON FILING THIS REPORT)

FOR OFFICE USE ONLY	
☐	COMPLETE _____
☐	INCOMPLETE _____
☐	ENTERED _____

NOTE: This form will be returned if all items are not properly completed and/or the form not signed.

SEC- (Rev. 11-86)

(NAME OF CAMPAIGN OR COMMITTEE)

(date of report)

TOTAL (item (c) must equal amount reported in Section 10, E.)

TOTAL (must equal the amount reported in Section 11. D.)

SEC. 4 (Rev. 11-86)

CAMPAIGN DISCLOSURE FORM

PART I

01 TYPE OF REPORT ☒ 30 Div Jordan 02 Social Security or Identification Number 250-11-4857

03 NAME OF CANDIDATE AND OR COMMITTEE Jackson, Darrell

04 CANDIDATE'S COUNTY OF RESIDENCE Richland

05 Mailing Address 1107 Bellevue St. Columbia SC 29201

06 POSITION SOUGHT: County Council 07 AGENCY: Richland County

08 TYPE OF ELECTION ☐ Primary ☐ General ☐ Special ☐ Runoff ☐ Convention or Caucus 09 DATE OF ELECTION 6 / 14 / 88

☐ Other-Reporting Period From: NO DAY YEAR TO: NO DAY YEAR

Successful? Yes x No

SUMMARY OF RECEIPTS AND EXPENDITURES

10 RECEIPTS (contributions)	UNITIZED (contributions of \$100 or less)	ITEMIZED (contributions of more than \$100) (Report on Schedule A)	TOTAL
A. Candidate's Personal Funds	N/A	100.00	100.00
B. Individual Contributions	4,740.48	7,480.00	12,220.78
C. In-kind contributions	N/A	1,099.00	1,099.00
D. Other Receipts	N/A	N/A	N/A
E. Receipts - Subtotal	4,740.48	8,580.00	13,320.78
F. Loans Rec'd. (Schedule C Sec. 1)	N/A	N/A	0
G. Less Loan Repayments (Schedule C Sec. 2)	N/A	N/A	0
H. TOTAL RECEIPTS	4,740.48	8,580.00	13,320.78

11 EXPENDITURES (All expenditures must be itemized on Schedule B)	TOTAL
A. Filing Fee	550.00
B. In-kind Expenditures (itemize on Schedule B)	N/A
C. Other Expenditures (itemize on Schedule B)	9,923.37
D. TOTAL EXPENDITURES (itemize on Schedule B)	10,473.37

12 BALANCE OF CONTRIBUTIONS

A. Contributions on Hand (Beginning of Reporting Period)	0
B. Total Receipts (10. H. above)	(+) 13,320.78
C. Total Expenditures (11. D. above)	(-) 10,473.37
D. Contributions on Hand (End of Reporting Period)	(-) 2,847.41

13 State the ultimate use of the contributions on hand (12. D. above): To continue campaigning towards November, 1988 General Election.

14 CERTIFICATION: I have examined this report and certify, to the best of my knowledge and belief, it is true, correct, and complete.

7-8-88
(Date)

Tammy L. Hays
(Signature)

Tammy L. Hays, Campaign Manager
(Name and Title of Person Preparing this Report)

FOR OFFICIAL USE ONLY

☒ COMPLETE
☐ INCOMPLETE
(ENTERED)

JUL 11 1988

RECEIVED

JUL 13 1988
STATE ETHICS
COMMISSION

RECEIVED

JUL 12 1988
STATE ETHICS
COMMISSION

This form will be returned if all items are not properly completed and/or the form not signed.

SEP-1 (Rev. 11-88)

CAMPAIGN DISCLOSURE FORM

PART II

SCHEDULE A
ITEMIZED RECEIPTSDate 1 Jackson
(month and day of year)(Contributions from each individual or group of more than \$100) July 7, 1988
(date of report)

(1) DATE	(2) NAME OF INDIVIDUAL OR GROUP MAKING CONTRIBUTION	(3) CONTRIBUTION THIS PERIOD	(4) CONTRIBUTIONS TO DATE
3-16-88	Darrell Jackson	100.00	100.00
3-16-88	Bishop A. C. Jackson	500.00	500.00
4-12-88	Sen. Isadore Lourie	150.00	150.00
4-12-88	Citizens For A competitive American	500.00	500.00
4-15-88	Thomas E. Felder	150.00	150.00
4-19-88	Thomas B. McTeer Jr.	100.00	100.00
4-19-88	Nathaniel Spells	100.00	100.00
4-21-88	Phil & Linda Lader	250.00	250.00
4-21-88	Warren (Cubby) Culbertson	100.00	100.00
4-22-88	Attorney General Travis Medlock	250.00	250.00
4-22-88	Attorney Richard Harpootlian	500.00	500.00
4-22-88	Jimmy Bales	100.00	100.00
5-2-88	Attorney Claude Scarborough	150.00	150.00
5-2-88	Rayward Bannister	150.00	150.00
TOTAL (must equal amount reported in Section 10. E.)		CONTINUED	

SCHEDULE B
ITEMIZED EXPENDITURES
(listing of all expenditures)

(1) DATE	(2) NAME AND ADDRESS OF PAYEE OR CANDIDATE TO WHOM EXPENDITURES WERE MADE	(3) PURPOSE OF EXPENDITURE	(4) AMOUNT
3-16-88	Richland Co. Democratic Party	Filing Fee	550.00
4-15-88	Velvetix Printers	bumper stickers	330.75
4-15-88	u.s. post office	stamps	62.50
4-20-88	Newton Manu. Company	balloons	50.00
4-22-88	Harbinger Publications	printing	200.00
4-22-88	Brian Costner	photography	73.00
5-2-88	John D. Gorski	art work	365.00
5-2-88	Alice Malavasic	Coord. fee	66.67
5-4-88	Kinko's	Copying	34.38
5-6-88	Newton Manu. Company	Balance on balloons	66.86
5-6-88	Harbinger Publications	Printing	160.00
5-6-88	Cramer's	Air tank	32.45
5-6-88	G&H Mail Service	Mail services	230.00
4-22-88	Harbinger Publications	Printing	220.50
TOTAL (must equal the amount reported in Section 11. D.)			

Additional items may be added if necessary.

NOTE: This form will be returned if all items are not properly completed.

SNC-1 (Rev. 11-88)

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CONTINUED FROM SCHEDULE A ITEMIZED RECEIPTS

Darrell Jackson
(Name of Candidate)

5- 9-88	Johnson, Toal & Battiste	100.00	100.00
5-11-88	Allen Thames	100.00	100.00
5-11-88	Samuel Tenenbaum	150.00	150.00
5-12-88	Lyles Glenn	150.00	150.00
5-16-88	Luther Lee	100.00	100.00
5-16-88	Jim Hamilton	250.00	250.00
5-23-88	Michael Kelly	100.00	100.00
5-27-88	Rep. Juanita White	100.00	100.00
5-30-88	Johnson's Garbage Services	100.00	100.00
5-30-88	Joseph Ard	250.00	250.00
5-30-88	Jeff Simons	200.00	200.00
5-30-88	Bishop F. C. James	200.00	200.00
5-30-88	Antioch AMEZ Church	200.00	200.00
5-30-88	Rep. Jim Faber	280.00	280.00
6- 1-88	Gergel, Burnette Law Firm	200.00	200.00
6- 8- 88	Det F. Bowers, Jr.	100.00	100.00
6- 8-88	Goldsmith - Theodore Agency	150.00	150.00
6- 8-88	Marvin Chernoff	100.00	100.00
6- 8-88	Boyd C. Hipp, II	150.00	150.00
6- 8-88	Frederick M. Zeigler	150.00	150.00
6-13-88	Hubert E. Yarborough, II	100.00	100.00
6-16-88	Norman J. Arnold	100.00	100.00
6- 6-88	Lt. Governor Nick Theodore	200.00	200.00
4-29-88	Joseph Lee Jackson	150.00	150.00
4-29-88	Bob Coble	150.00	150.00
4-29-88	Rep. Tim Rogers	200.00	200.00
4-29-88	Attorney Larkin V. Campbell	250.00	250.00
	TOTAL	7,480.00	7,480.00

(CONT.) SCHEDULE B IT SEE EXPENDITURES

5-11-88	Kinko's Copies	Copying	18.02
5-13-88	Harbinger Publications	Printing	787.50
5-16-88	G & H Mail Service	Mail service	215.74
5-17-88	The Palmetto Post	Ad	200.00
5-19-88	Equal Time	Phone bank	400.00
5-19-88	Alaice Malavasic	Coord. Fee	52.50
5-27-88	Equal Time	Phone Bank	400.00
5-30-88	G&H Mail Service	Mail services	64.18
6- 1-88	Alice Malavasic	Coord. fee	75.63
6- 3-88	Equal Time	Phonebank	300.00
6- 3-88	Kinko's Copies	copying	145.64
6- 6-88	Columbia Office Supply	supplies	86.51
6- 6-88	Ridgewood Precinct	Contribution	25.00
6- 6-88	Harbinger Publication	Printing	341.25
6- 8-88	JuJu Publishing Co.	Ad	150.00
6- 9-88	G&H Mail Service	Mail service	435.50
6- 9-88	Sunrise Enterprise	Radio Buy	1022.20
6-10-88	Miller & Youngblood	Consultant serv.	300.00
6-10-88	Harbinger Publication	Printing	4.50
6-12-88	Jimmy Thomas	GOTV worker	40.00
6-13-88	Rebecca Cohens	"	75.00
6-13-88	Alberta Middleton	"	100.00
6-13-88	Mary Howell	"	35.00
6-13-88	Terry Jackson	"	35.00
6-13-88	Yongs Jackson	"	35.00
6-13-88	Alfred Bates	"	75.00
6-13-88	Brenda Edmonds	"	35.00
6-13-88	Lavette Jefferson	"	35.00
6-13-88	G&H Mail Service	Mail services	49.64
6-13-88	Sunrise Enterprise	Consulting serv.	400.00
6-13-88	Sunrise Enterprise	Radio Buys	188.70
6- 1-88	Alice Malavasic	Coord. fee	162.50
6-14-88	Harold Cuff (BIBLEWAY CHURCH MINISTER)	bluff GOTV	290.00
6-15-88	Tammy House	Camp. Hgt. fee	500.00
6-15-88	Layford Johnson	GOTV worker	40.00
6-17-88	U.S. Post Office	stamps	10.50
6-18-88	U.S. Post Office	"	20.75
6-21-88	Cash	Reimbursement	400.00

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SCHEDULE B MISCELLANEOUS EXPENDITURES

1-1-88	Herb Segers (Palmetto Post)	Ad	44.00
6-24-88	Roy Wiggins (<i>BIBLEWAY CHURCH DERCON</i>)	Reimbursement for workers	300.00
TOTAL			10,482.37

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100-443888-100
 DEC 04 1968
 100-443888-100

**This Space for Use
by
Secretary of State**

See attached sheet

8.

- A. To buy, sell, rent and invest in property, wherever situate and of whatever kind, and to provide and conduct lawful business and community services.
- B. To clean and provide janitorial services for industrial, commercial and private individuals, construct, fabricate, refurbish, reconstruct, modify, alter, improve, or dismantle buildings and structures of all kinds, to sell at wholesale and retail and otherwise deal in materials and equipment and products, including but not limited to, buildings and homes, and other dwellings, condominiums, apartments of every description and to provide services with respect to the foregoing and to otherwise transact any and all lawful business incidental thereto, associated therewith, or otherwise considered by the corporation to be necessary or desirable.
- C. To purchase, acquire, hold, improve, manage, sell, convey, assign, exchange, encumber, hire, lease, release, mortgage and deal in real and personal property of every kind, description and character.

To apply for, purchase, or acquire by assignment, transfer or otherwise to hold, mortgage or otherwise pledge, and to sell, exchange, transfer, deal in and with any license power, authority, concession, right of privilege which any corporation may make or grant.
- D. To endorse, lend its credit, or otherwise guarantee, or obligate itself for, or pledge or mortgage all or any part of its properties for the payment of the principle and interest, or either, on any bonds, debentures, notes, coupons, script or other obligations or evidence of indebtedness, or the performance of any contract, mortgage or obligation, of any other corporation, association, domestic, or foreign, or of any person, firm, partnership or joint venture.
- E. To enter into, make and perform contracts of every kind for any lawful purpose without limit as to amount, with any person, firm, association, corporation, municipality, county, state, territory, government, governmental subdivision or body politic.
- F. To acquire the good will, assets, properties and rights, and to undertake the whole or any part of the liabilities of any person, firm, business entity, association or corporation, to pay for the same in cash, the stock or other securities of the corporation, or otherwise; to hold or in any manner dispose of the whole or any part of the businesses, properties, or establishments so acquired and to exercise all the powers necessary or convenient in and about the conduct and lawful management of any such business.
- G. To borrow and lend money, without security, or upon the giving or receipt of such security of the Board of Directors of the corporation may deem advisable by the way of pledge, mortgage, assignment or otherwise, of real and personal property of every nature and description, or by way of guaranty or otherwise.
- H. To enter into any plan or project for the assistance of its employees.
- I. To enter into any lawful arrangement for sharing of profits, union of interest, reciprocal concession or corporation, as partners (general or limited), joint ventures, or otherwise, with any person, partnership, corporation, association, combination, organization, entity, or other body whatsoever, domestic or foreign, carrying on or proposing to carry on any business which this organization is authorized to carry on, or any business or transaction deemed necessary, convenient or incidental to the carrying out of any of the objectives of this corporation.
- J. To have one or more offices to carry on all of its operations and business without restriction or limit as to amount, in any states, districts, territories, or possessions or colonies of the United States, and in any and all foreign countries, subject to the law of such state, and in any and all foreign countries, subject to the law of such states, districts, territory, possession, colony or country.

- K. To act as jobber, agent or broker in buying, selling and dealing in real and personal property of every nature and description and leases respecting the same and estates and interest therein and mortgages and securities thereon, in making and obtaining loans, whether secured by such property or not, and supervising, managing and protecting such property and loans and all interest in and claims affecting the same.
9. Shareholder(s) may enter into an agreement to operate the corporation as if it were a partnership pursuant to Code Section 33-11-220 under the laws of South Carolina.

10. The name and address of each incorporator is as follows:

Name	Street & Box No.	City	County	State
(a) <u>Howard Barnister</u>	<u>1120 Orange Street</u>	<u>Columbia</u>	<u>Richland</u>	<u>SC</u>
(b) <u>William J. Chapman</u>	<u>Broadway Street</u>	<u>Columbia</u>	<u>Richland</u>	<u>SC</u>
(c) <u>Darrell Jackson</u>	<u>2936 Dell Drive</u>	<u>Columbia</u>	<u>Richland</u>	<u>SC</u>
(d) <u>A. C. Jackson</u>	<u>2932 Dell Drive</u>	<u>Columbia</u>	<u>Richland</u>	<u>SC</u>

Howard Barnister
Signature of Incorporator
William J. Chapman
Signature of Incorporator
Darrell Jackson
Signature of Incorporator
A. C. Jackson
Signature of Incorporator

Howard Barnister
Type or Print Name
William J. Chapman
Type or Print Name
Darrell Jackson
Type or Print Name
A. C. Jackson
Type or Print Name

Date: December 4, 1986

STATE OF South Carolina

COUNTY OF Richland

The undersigned Howard Barnister, William J. Chapman, Darrell Jackson & A. C. Jackson do hereby certify that they are the incorporators of Surris Enterprise of Columbia, Inc. Corporation and are authorized to execute this verification; that each of the undersigned does hereby certify that he or she has read the foregoing document, understands the meaning and purpose of the statements therein contained and the same are true to the best of his or her information and belief.

Howard Barnister
Signature of Incorporator
William J. Chapman
Signature of Incorporator

Darrell Jackson
Signature of Incorporator
A. C. Jackson
Signature of Incorporator

CERTIFICATE OF ATTORNEY

Law Offices of E. W. Cromartie
I, By: Susan G. Williams, an attorney licensed to practice in the State of South Carolina, certify that the corporation, to whose articles of incorporation this certificate is attached, has complied with the requirements of Chapter 7 of Title 33 of the Code of Laws of South Carolina (1976) relating to the organization of corporations, and that in my opinion, the corporation is organized for a lawful purpose.

Date: December 4, 1986

Law Offices of E. W. Cromartie
By: Susan G. Williams
Signature

Susan G. Williams, Esquire
Type or Print Name

P. O. Box 8417, 1926 Hampton Street
Address

Columbia, S. C. 29202
City State Zip

SCHEDULE OF FEES

(Payable at time of filing Articles with Secretary of State)

Fee for filing Articles
In addition to the above, \$ 40 for each
\$1,000.00 of the aggregate value of
shares which the corporation is author-
ized to issue, but in no case less than
one more than

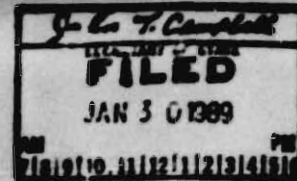
\$ 5.00

40.00
1,000.00

NOTE THIS FORM MUST BE COMPLETED IN ITS ENTIRETY BEFORE IT WILL BE ACCEPTED FOR FILING
THIS FORM MUST BE ACCOMPANIED BY THE FIRST REPORT OF CORPORATIONS AND A CHECK IN THE
AMOUNT OF \$10.00 PAYABLE TO THE SOUTH CAROLINA TAX COMMISSION

8617665

STATE OF SOUTH CAROLINA
SECRETARY OF STATE



NOTICE OF CHANGE OF REGISTERED OFFICE
OR REGISTERED AGENT OR BOTH
OF A SOUTH CAROLINA
OR FOREIGN CORPORATION

JAN 01/02 4975
07-001466/07-001466 00-45-00 (12)
01-20-07 FWT 520.00
SECT OF STATE OF SOUTH CAROLINA

Pursuant to §§33-6-102 and 33-15-108 of the 1976 South Carolina Code, as amended, the under-
signed corporation submits the following information.

1. The name of the corporation is Sunrise Enterprise of Columbia, Inc.
2. The corporation is (complete either a or b, whichever is applicable):
 a. a domestic corporation incorporated in South Carolina on Dec. 4, 1986; or
 b. a foreign corporation incorporated in _____ on _____, and
 authorized to do business in South Carolina on _____
(Date) (Date) (Date)
3. The street address of the current registered office in South Carolina is 1107 Bellview St.
Columbia, South Carolina 29201
(Street & Number) (Zip Code)
4. If the current registered office is to be changed, the street address to which is registered office
 is to be changed is _____ in the city of _____ South Carolina _____
(Street & Number) (Zip Code)
5. The name of the present registered agent is William J. Chapman
6. If the current registered agent is to be changed, the name of the successor registered agent is
Wayward Bannister
 *I hereby consent to the appointment as registered agent of the corporation:

Wayward Bannister
(Signature of New Registered Agent)

7. The address of the registered office and the address of the business office of the registered agent,
 as changed, will be identical.
8. Unless a delayed date is specified, this application will be effective upon acceptance for filing
 by the Secretary of State (See §33-1-230(b)): _____

* Pursuant to §§33-6-102(5) and 33-15-108(5), the written consent of the registered agent may be
 attached to this form.

4. Credit Carryover (line 1 less line 3) _____

SCHEDULE D

ANNUAL REPORT TO BE COMPLETED BY ALL CORPORATIONS

1. Incorporated under the Laws of the State of SOUTH CAROLINA on DECEMBER 4, 1986
2. If Foreign Corporation, the date qualified to do business in the State of South Carolina is N/A
3. Location of the Registered Office of the Corporation in the State of South Carolina is 1215 ANTHONY AVE in the City of COLUMBIA
Registered Agent at such address is HEYWARD BANNISTER
4. Was the name of the Corporation changed during the year? NO Give old name N/A
5. Date commenced business in the state of South Carolina was DECEMBER 4, 1986
6. Location of principal office in S.C. 1215 ANTHONY AVE. COLUMBIA, SC 29201
Nature of principal business in S.C. JANITORIAL SERVICES/CONSULTING SERVICES
7. The Corporation's books are in the care of _____
Located at _____

8. If Foreign Corporation, have all changes in structure since the filing of the last Annual Report been reported to the Secretary of State, in South Carolina? N/A

9. If filing consolidated, complete and attach Schedule J listing name, address and affiliation of all Corporations.

10. If a professional corporation are all shareholders, one-half of the directors and all officers (other than the secretary and treasurer) qualified to practice the professional services engaged in by the corporation? N/A

11. The total number of authorized shares of capital stock itemized by class and series, if any, within each class is as follows:

Number of Shares	Class	Series
100,000	COMMON	

12. The total number of issued and outstanding shares of capital stock itemized by class and series, if any, within each class is as follows:

Number of Shares	Class	Series
10,000	COMMON	

13. The total amount of stated capital per balance sheet is:

Total paid in Capital Stock	\$	
Total paid in Capital Surplus	\$	
Total amount of stated Capital	\$	

14. The names and business addresses of the directors (or individuals functioning as directors) and principal officers in the Corporation are:
(If additional space is necessary, attach separate schedule.)

NAME

BUSINESS ADDRESS AND OFFICE

BISHOP A.C. JACKSON	2932 DELL DRIVE COLUMBIA, SC 29209
HEYWARD BANNISTER	1215 ANTHONY AVE. COLUMBIA, SC 29201
DARRELL JACKSON	1215 ANTHONY AVE. COLUMBIA, SC 29201

Surprise Enterprise of Cola 90/91

1. Incorporated under the Laws of the State of South Carolina on December 4, 1986
2. If Foreign Corporation, the date qualified to do business in the State of South Carolina is N/A
3. Location of the Registered Office of the Corporation in the State of South Carolina is 1215 Anthony Ave in the City of Columbia
Registered Agent at such address is Heyward Bannister
4. Was the name of the Corporation changed during the year? NO Give old name N/A
5. Date commenced business in the state of South Carolina was December 4, 1986
6. Location of principal office in S.C. 1215 Anthony Avenue, Columbia, SC 29201
Nature of principal business in S.C. Janitorial Services
7. The Corporation's books are in the care of [REDACTED]
Located at [REDACTED]
8. If Foreign Corporation, have all changes in structure since the filing of the last Annual Report been reported to the Secretary of State, in South Carolina? N/A
9. If filing consolidated, complete and attach Schedule J listing name, address and affiliation of all Corporations.
10. If a professional corporation are all shareholders, one-half of the directors and all officers (other than the secretary and treasurer) qualified to practice the professional services engaged in by the corporation? N/A
11. The total number of authorized shares of capital stock itemized by class and series, if any, within each class is as follows:

Number of Shares	Class	Series
100,000	Common	

12. The total number of issued and outstanding shares of capital stock itemized by class and series, if any, within each class is as follows:
- | Number of Shares | Class | Series |
|------------------|--------|--------|
| 10,000 | Common | |

13. The total amount of stated capital per balance sheet is:

Total paid in Capital Stock	\$ [REDACTED]
Total paid in Capital Surplus	\$ [REDACTED]
Total amount of stated Capital	\$ [REDACTED]

14. The names and business addresses of the directors (or individuals functioning as directors) and principal officers in the Corporation are.
(If additional space is necessary, attach separate schedule.)

NAME	BUSINESS ADDRESS AND OFFICE
Bishop A.C. Jackson	2932 Dell Drive, Columbia, SC 29209
Heyward Bannister	1215 Anthony Ave., Columbia, SC 29201
Darrell Jackson	1215 Anthony Ave., Columbia, SC 29201

*Sunrise Enterprise
of Columbia of S.C*

89/90

*See Civil Action
#91-2173 in 4th Circuit
Court of Appeals*

Please Note:

- (1) Bishop Jackson is the pastor of the Bible way Church of Atlas rd.
- (2) Darrel Jackson is the pastors assistant at the Bibleway Church of atlas rd.
- (3) The above are also either co-chairpersons and or directors of coalition of Black Churches
- (4) The above are also co-chairpersons of the project ADAM, an anti drug program/organization, non-profit, which uses Black churches leaders as its core. This organization is believed to be used as a political tool.

(Please note that the Bible way Church is a national organization with bishop serving on the Board of Bishops.)

The State of South Carolina

EXECUTIVE DEPARTMENT

CERTIFICATE OF INCORPORATION BY THE SECRETARY OF STATE

WHEREAS, Bishop F. C. James, Post Office Box 4837, Columbia, SC
Bishop A. C. Jackson, 2932 Dell Drive, Columbia, SC

two or more of the officers or agents appointed to supervise or manage the affairs of
THE SOUTH CAROLINA COALITION OF BLACK CHURCH LEADERS, INC.

which has been duly and regularly organized, did on the 15th day of
July, A. D. 19 87, file with Secretary of State a written declaration setting forth:

That, at a meeting of the aforesaid organization held pursuant to the by-laws or regulations of the said organization, they
were authorized and directed to apply for incorporation.

That, the said organization holds, or desires to hold property in common for Religious, Educational, Social, Fraternal,
Charitable or other eleemosynary purpose, or any two or more of said purposes, and is not organized for the purpose of profit
or gain to the members, otherwise than is above stated, nor for the insurance of life, health, accident or property; and that three
days' notice in the Star Reporter, a newspaper published in the
County of Richland, has been given that the aforesaid Declaration would be filed.

AND WHEREAS, Said Declarants and Petitioners further declared and affirmed:

FIRST: Their names and residences are as above given.

SECOND: The name of the proposed Corporation is THE SOUTH CAROLINA COALITION OF BLACK CHURCH
LEADERS, INC.

THIRD: The place at which it proposes to have its headquarters or be located is 3700 Forest Drive
(P.O. Box 4837, Columbia) Forest Acres, SC

FOURTH: The purpose of the said proposed Corporation is the purpose of the proposed corporation is to
establish and operate various projects that will promote the social welfare of South Carolina.
The Coalition is organized for the promotion of social welfare, substantially all of its activities
shall be for such purposes, and no part of the net earnings of the corporation shall inure to the
benefit of any member. It is intended that the corporation be organized and operated in such a
manner that it shall qualify as a non-profit corporation within the meaning of section 501(c)(4) of
the Internal Revenue Code of 1986 or the corresponding provision of any future United States
Internal Revenue law.

Notwithstanding any other provision of this Charter, the corporation shall not carry on any other
activities not permitted to be carried on by an organization exempt from federal income tax under
section 501(c)(7) of the Internal Revenue Code of 1986 or the corresponding provision of any future
United States Internal Revenue law.

FIFTH: The names and residences of all Managers, Trustees, Directors or other officers are as follows:

Bishop F. C. James	P. O. Box 4837, Columbia, SC	Director
Rev. S. C. Cureton	2334 Elmwood Ave., Columbia, SC	Director
Bishop A. C. Jackson	2932 Dell Dr., Columbia, SC	Director
Rev. J. O. Rich	2334 Elmwood Ave., Columbia, SC	Director

SIXTH: That they desire to be incorporated: in perpetuity

Now, THEREFORE, I, JOHN T. CAMPBELL, Secretary of State, by virtue of the authority in me vested, by Chapter
31, Title 33, Code of 1976 and Acts amendatory thereto, do hereby declare the said organization to be a body politic and
corporate, with all the rights, powers, privileges and immunities, and subject to all the limitations and liabilities, conferred by
said Chapter 31, Title 33, Code of 1976 and Acts amendatory thereto.

GIVEN under my hand and the seal of the State, at Columbia,
this 15th day of July
in the year of our Lord one thousand nine hundred and
87 and in the two hundred and Twelfth
year of the Independence of the
United States of America.

JOHN T. CAMPBELL,
Secretary of State.

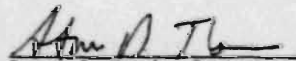
23040960173

23040960174

STATE OF SOUTH CAROLINA
RICHLAND COUNTY

THIS IS TO CERTIFY THAT This and/or the attached is
a true and accurate copy of Certificate of Incorporation
for The South Carolina Coalition of Black Church Leaders, Inc.
recorded in Records of the Secretary of State Corporation
Charter Division, Eleemosynary Chapter #23060, 15 July 1987
now on deposit with South Carolina Department of
Archives and History

GIVEN UNDER MY HAND AND THE SEAL OF THE DEPARTMENT
This twentieth day of April, Nineteen Hundred Ninety-two.


Steven D. Tuttle, Supervisor
Reference Services

Cable Bob 34

Various	Harbinger Publications Columbia, SC	Printing	1,181.75
4/2/90	Katheryn Haskell Columbia, SC	Refund	175.00
3/12/90	Jaco's Columbia, SC	Refreshments	50.25
Various	Kingfisher Productions Columbia, SC	Media production	4,915.00
Various	Kinko's Columbia, SC	Printing	464.10
Various	Judie Miller Columbia, SC	Consulting fee; reimbursement	9,881.17
3/13/90	Office Warehouse Columbia, SC	Supplies	122.68
4/11/90	Omega Psi Phi Columbia, SC	Advertisement	200.00
4/27/90	Pickles Associates Columbia, SC	Copying	6.48
Various	Lois Pope Columbia, SC	Reimbursement for postage	280.17
3/6/90	St. Patrick's Celebration Columbia, SC	Parade entrance fee	25.00
4/6/90	Nancy Sandel Columbia, SC	Refreshments	63.38
4/27/90	Shandon Neighborhood Council; Columbia, SC	Advertisement	40.00
Various	Southern Bell Columbia, SC	Telephone service	953.83
Various	Southern National Bank Columbia, SC	Money printed; bank service charges	124.58
(Various	Sunrise Enterprises, Inc. Columbia, SC	Consulting fee; media fees, rein- bursement for expenses	27,356.98
Various	Taylor Street Copy Center Columbia, SC	Printing	1,522.78
1/3/90	Town House Columbia, SC	Reception	1,200.00
Various	U.S. Postmaster Columbia, SC	Postage	11,662.07

60175.22

23040960175

Page 1 of 1

PART II

Bob Cobble

NAME OF CANDIDATE FOR CLERK: TAYLOR, J.

(date of report)

4, 0 9, 6, 0, 1, 7, 6

410

410

3462.44

Cable Box

SCN PAC, Columbia (James Murphy)	5/10/90	250
	6/11/90	100
Bernice Scott, Gadsden	5/31/90	50
Mary Scott, Columbia	6/10/90	20
Peter Sarcar, Columbia	6/11/90	100
M/M Andy Shlon, Columbia	5/30/90	50
Kelly Shuptrine, Columbia	5/30/90	50
Warren Sipple, Columbia	5/30/90	10
W.M. Skinner, Columbia	6/11/90	100
M/M Gerald Smith, Columbia	5/30/90	100
J. Emory Smith, Jr., Columbia	5/30/90	25
SOL PAC, Columbia (Wa. Mahon)	6/11/90	100
M/M Robert Sollee, Columbia	5/30/90	25
Southbridge Properties, Inc., Cola. (Wayne Smith)	6/11/90	100
Southeastern Concrete Products Co., Cayce-W. Cola. (C.A. Carson)	6/11/90	100
Southwinds, Ltd., Columbia (Ed Bagwell)	6/22/90	750
Sovereign Homes, Cola. (Gary Taylor)	6/11/90	100
Sunrise Enterprise of Cola., Cola. (Darrell Jackson & Maynard Bannister)	6/11/90	500
H. K. Steele Sand Co., Inc., W. Cola.	6/11/90	100
R. Gerald Steele, Columbia	6/11/90	100
Dr. & Mrs. John Stine, Columbia	5/30/90	50
W. J. Stubbs, Jr., Columbia	6/10/90	100
April Lucas & John Stucker, Columbia	5/30/90	100
Sunrise Enterprise of Columbia, Inc., (Darrell Jackson & Maynard Bannister)	6/14/90	500
M/M J. Sanders Tate, Columbia	6/10/90	25

3505-

Robert L. Sunwalt, III Columbia, SC	4/13/90	50
Sunrise Enterprise of Cola., Inc. Columbia, SC (Darrell Jackson)	9/26/89	100
M/M Joseph Surface Columbia, SC	3/26/90 3/30/90	25 25
Swerling & Harpootlian Columbia, SC (Jack Swerling)	9/19/89	100
Jack Swerling Columbia, SC	3/29/90	500
Raven Graydon Tarpley Columbia, SC	11/5/89	25
J. Sanders Tate Columbia, SC	2/2/90	25
Bernard C. Taylor Columbia, SC	3/14/90	10
John Tecklenburg Charleston, SC	4/ / 90	100
Henry Tecklenburg Charleston, SC	4/25/90	500
Samuel Tenenbaum Lexington, SC	9/24/89 11/8/89 3/13/90	100 100 100
Charles L.A. Tennant Columbia, SC	1/31/90	25
D. Allen Thames Columbia, SC	2/13/90	50
Robert J. Thomas, Jr. Columbia, SC	2/1/90	25
Sidney Thoma, Jr. Columbia, SC	4/25/90	40
Elliot Thomas Columbia, SC	2/3/90 3/19/90	500 500
M/M Arthur B. Tiemann Columbia, SC	3/7/90	25
John L.M. Tobias Columbia, SC	3/4/90	100
Mrs. E. Hickson Tomlinson Columbia, SC	2/9/90	25

Cable B-28

4500



INVOICE#

0487

DATE

4-26-91

CLIENT:

Sunrise Enterprise

ATTENTION:

Darryl Jackson

JOB DESCRIPTION:

Livola Taylor Mailer

received
5-15-91

ITEMIZED SERVICES

AMOUNT

Printing of 3500 mailers

\$498.00

DISCOUNTED
FINAL PRICE

received
5-15-91

425.00

Terms: If payment in full is not received by DUE DATE, the unpaid balance will be subject to a FINANCE CHARGE of 1.5% per month (18% per year). Any legal fees incurred in the collection of this invoice, shall be paid by the client named on this invoice. Further use of these designs are contingent upon the permission or purchase of rights from PASTEL DESIGN GROUP. Approval of copy and image materials during production, as well as final job proofing, is the responsibility of the client. Subsequent changes (additions/deletions/modifications) shall be considered AC (Author's Change), and shall be billed to the client accordingly. Corrections made by PASTEL DESIGN GROUP shall be considered OC (Our Change) and shall be credited as such. Estimates are subject to change with prior notification.

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DATE DUE

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HOUSE ETHICS
COMMITTEE

NELSON, MULLINS, RILEY & SCARBOROUGH

ATTORNEYS AND COUNSELORS AT LAW
(A PARTNERSHIP INCLUDING PROFESSIONAL ASSOCIATIONS)
September 5, 1991

CLAUDE M. SCARBOROUGH, JR.
RICHARD W. RILEY
EDWARD W. MULLINS, JR.
WILLIAM S. NELSON, II
R. BRUCE SHAW
JOHN U. BELL, III
WILLIAM S. DAVIES, JR.
DONALD H. STUBBS
ROBERT M. ERWIN, JR.
JAMES C. BLAKELY, JR.
RALSTON B. VANZANT, II
WILLIAM O. SWEENEY, III
STEPHEN S. MORRISON
EDWARD E. POLIAKOFF
JOHN C. STENART, JR.
BRENTON D. JEFFCOAT
SHERYL CUDG BLENIS
THORNTON F. SOWELL
JOHN T. MOORE
GEORGE S. BAILEY
JOHN M. CAMPBELL, JR.
RICHARD B. WATSON
WILLIAM C. HUBBARD
DWAYNE F. DRAKE
GEORGE S. WOLFE
HENRY S. KNIGHT, JR.

KENNETH E. YOUNG
JAMES C. GRAY, JR.
NINA NELSON SMITH
CHARLES R. NORRIS
J. DOUGLAS NUNN, JR.
RICHARD H. WILLIS
JOEL H. SMITH
DAVID G. TRAYLOR, JR.
MONTEITH P. TODD
L. SIDNEY CONNOR, IV
ROBERT W. FOSTER, JR.
REBECCA LAFFITTE
DAVID E. OUKES
ARTHUR L. COLEMAN
L. WALTER TOLLISON, III
JOHN S. EGAN
DAVID T. MONTEITH
GEORGE S. CAUTION
TIMOTHY D. SCRANTON
BARBARA HOWE MCARTHUR
KENNETH ALLAN JANIK
LISA C. CATT
CHRISTOPHER J. DANIELS
GEORGE K. LYALL
RICHARD A. FARRIER
NANCY BYNUM RILEY

JANE THOMPSON DAVIS
JOHN E. SCHMIDT, III
STUART M. ANDREWS, JR.
CAROLYN CASON MATTHEWS
N. THOMAS CAUSBY
LAURA S. CAMPBELL
ROYANN RUSS MURRAY
DEBORAH WILLIAMSON WITT
SUSAN C. PAROLE
RUSSELL E. FLOWDEN
KAREN ALDRIDGE CRAWFORD
NEWMAN JACKSON SMITH
POLLY D. ENGER
THOMAS E. LYDOM, III
DAVID E. HODGE
ROBERT O. MERIWETHER
ENROLL ANNE YARBROUGH HODGES
HOWARD A. VANDINE, III
GRADY L. BEARD
PATRICK F. O'DEA
THOMAS F. MORAN
O. VANESSA STONER
J. CALHOUN WATSON
PHILLIP LUKE HUGHES
J. MARK JONES
CHERRIE L. WILSON

JOSEPH M. MELCHERS
ROBERT M. BRUNSON
KENNETH W. HARRELL
LINDA WOLBRUCK RUNGE
KAREN HUDSON THOMAS
AUGUSTUS M. DIXON
JULIE JEFFORDS-MOORE
STEPHEN N. H. LEWIS
JEANNE M. NYSTROM
A. HARVIN QUATTLEBAUM, JR.
JAMES F. ROGERS
BENJAMIN RUSH SMITH, III
AMY C. HENDRIX
ELIZABETH SCOTT MOORE
BARBARA E. BRUNSON
DANIEL J. WESTBROOK
JOHN F. MURPENS
EDWIN LAKE TURNAGE
C. MITCHELL BROWN
M. CLIFTON SCOTT
JEFFREY A. JACOBS
GEORGE T. GREGORY, III
ANGUS H. MACAULAY, JR.
JANE HUNT HARRIS
LAURA E. DOOLE
SUSAN H. GLENN

COLUMBIA OFFICES:
THIRD FLOOR, KEENAN BUILDING
1230 LADY STREET
POST OFFICE BOX 1070
COLUMBIA, SOUTH CAROLINA 29201
1803 746-4000
TELECOPY 1803 746-7500 / 732-0400

CHARLESTON OFFICES:
SUITE 400 - LIBERTY CENTER
15 MEETING STREET
POST OFFICE BOX 1808
CHARLESTON, SOUTH CAROLINA 29408
1803 883-8200
TELECOPY 1803 722-8700

GREENVILLE OFFICES:
TWENTY-FOURTH FLOOR, DANIEL BUILDING
30 NORTH MAIN STREET
POST OFFICE BOX 10084
GREENVILLE, SOUTH CAROLINA 29603
1803 250-2300
TELECOPY 1803 232-8000

LEXINGTON OFFICES:
234 OLD CHANN RD
POST OFFICE BOX 720
LEXINGTON, SOUTH CAROLINA 29072
1803 733-0404 / 700-2000
TELECOPY 1803 200-7000

MYRTLE BEACH OFFICES:
SUITE 201, FOURMORS CENTRE
241 ONE STREET
POST OFFICE BOX 3030
MYRTLE BEACH, SOUTH CAROLINA 29575-3030
1803 440-3500
TELECOPY 1803 445-3437

PROFESSIONAL ASSOCIATION

ROBERT E. LEE, GARNER
J. CHRISTOPHER HENDERSON
EDWARD P. RILEY, SR.
EDWARD P. RILEY, JR.
ROBERT P. WILKINS
ROBERT P. WILKINS, JR.
JOHN S. WILLIAMS
OF COUNSEL

PATRICK HENRY NELSON (1888-1944)
JIM SHANNON NELSON (1888-1944)
PATRICK H. NELSON (1810-1884)
F. BARRON GRIER, JR. (1807-1871)
EDWARD W. MULLINS, SR. (1883-1888)

Ms. Levola Taylor
Post Office Box 3076
Columbia, SC 29230

Dear Levola:

Nelson, Mullins, Riley and Scarborough is pleased to make the enclosed \$250 contribution to your campaign account.

Yours very truly,

NELSON, MULLINS, RILEY & SCARBOROUGH

By:

Claude M. Scarborough, Jr.
Claude M. Scarborough, Jr.

CMSjr:jc
Enclosure

cc: I. S. Leevy Johnson

RECEIVED

HOUSE ETHICS
COMMITTEE

7/24/91
(Date of Report)

[illegible]

Jones

(1)

← Churches →

- 4-7-91 - St Mark Bpt. Church, P.O. Box
Gadsden, S.C. 29052 - \$ 15.00
- 4-7-91 - Pleasant Grove Bpt. P.O. Box
Gadsden, S.C. 29052 - \$ 10.00
- 4-9-91 - Unity Evangelistic, P.O. Box
Eastover, S.C. 29044 - \$ 20.00
- 4-13-91 - St Phillip AME, P.O. Box
Eastover, S.C. 29044 - \$ 5.00
- 4-18-91 - Antioch AME Z. Antioch Church
Rd. Eastover, S.C. 29044 - \$ 50.00
- 4-19-91 - Rock Hill AME, P.O. Box
Hopkins, S.C. 29061 - \$ 5.00
- 4-28-91 - Shiloah AME, P.O. Box
Eastover, S.C. 29044 - \$ 5.00
- 4-28-91 - Daughters of Zion Bpt. 1115
Oldm^e Graw Rd. Eastover, S.C. 29044 - \$ 5.00
- 4-28-91 - Mt Morriah Bpt. Rte 1, Box
174 Hopkins, S.C. 29061 - \$ 10.00
- 5-5-91 - Ladson's Chapel, Rte 1, Box
360, Hopkins, S.C. 29061 - \$ 5.00

TOTAL \$ 130.00

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Churches

5-19-91	Antioch AMEZ Church	\$10.00
"	Pleasant Grove Baptist Church	5.00
5-26-91	St. Mark Church	5.00
"	St. John Baptist Church	10.00
6-1-91	Jerusalem Baptist Church	25.00
6-2-91	Goodwill Baptist Church	10.00
6-15-91	New Light Buleah Church	10.00
6-12-91	Rev. A.B. Chavis Church	25.00
6-15-91	St. Matthews Baptist Church	10.00
6-16-91	Zion Benevolent Church	10.00
6-24-91	Antioch AMEZ Church	24.00
7-7-91	Antioch AMEZ church	24.00
7-15-91	St. Luke AME Church	25.00
		\$193.00

RECEIVED

JUL 25 1991
HOUSE ETHICS
COMMITTEE

== Precincts GET OUT The VOTE ==

6-26-91	Robert C. Williams	\$ 35.00
"	Charlie P. Williams	\$ 35.00
"	Rev. Layford Johnson	\$ 35.00
"	Willie Floyd	35.00
"	Alice Scott	35.00
"	Rev. Richard Robinson	35.00
"	Robert Jacobs	35.00
"	Celkey Weston	35.00
"	Beatrice Scott	35.00
6/27/91	Catherine Jackson	35.00
-6/28/91	Diane Floyd	35.00
"	Alberta Middleton	35.00
"	Ernestine Alston	50.00
6-28-91	Rebecca Cohens	35.00
"	Laura Jefferson	60.00
6-29-91	Sallie Gibson	35.00
"	Clonise Watson	35.00
		<u>\$ 635.00</u>

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JUL 25 1991

HOUSE ETHICS
COMMITTEE

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

ROBERT LEE WILLIAMS,)
)
Plaintiff,)
)
vs.)

CIVIL ACTION NO. 3:90-1424-OH

C. ERROL CATOE, Individually)
and as Executive Director of)
the South Carolina Licensing)
Board for Contractors; HARRY)
KENT, Individually and as)
Vice-Chairman of the South)
Carolina Licensing Board for)
Contractors; WALTER HUNTER,)
Individually and as a Board)
Member of the South Carolina)
Licensing Board for)
Contractors; GARY SHELTON,)
Individually and as a Board)
Member of the South Carolina)
Licensing Board for)
Contractors; JOHN T. WATKINS,)
Individually and as Director)
of the Home Builders)
Commission of South Carolina;)
ALICE C. BROADWATER,)
Individually and as Assistant)
Attorney General in charge of)
Civil Litigation for South)
Carolina; GEORGE K. LYALL;)
NINA NELSON SMITH; and MELODY)
RENEE BLACK, Individually and)
as Attorneys for Nelson,)
Mullins, Riley and Scarborough)
Law Firm; EDWARD MULLINS, JR.,)
Individually and as Partner)
and Attorney for Nelson,)
Mullins, Riley and)
Scarborough Law Firm; NELSON,)
MULLINS, RILEY AND)
SCARBOROUGH, Counselors and)
Attorneys at Law; C. VICTOR)
PLYE, JR., Individually and as)
Judge for the State of South)
Carolina; ROBERT SMALL, JR.,)
Individually and as owner of)
Avtex Properties, Inc./Avtex)
Construction Company; ALAN)
HARDIN, Individually and as)
Construction Manager for Avtex)
Properties, Inc./Avtex)

ORIGINAL FILED

MAR 26 1991

ANGIE A. BIRCH, CLERK
COLUMBIA, S. C.

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Construction Company; JAMES E.)
KNIGHT, JR., Individually and)
as Attorney for the Law)
Offices of James E. Knight,)
Jr.; THE LAW OFFICES OF)
JAMES E. KNIGHT, JR.,)
MICHAEL A. PULLIAM,)
Individually and in his)
capacity as Attorney for)
Richardson, Plowden, Grier and)
Howser Counselors and)
Attorneys at Law; RICHARDSON,)
PLOWDEN, GRIER and HOWSER)
Counselors and Attorneys at)
Law; JERRY D. SANDERS,)
Individually and as Agent for)
Maryland Casualty Company;)
and MARYLAND CASUALTY COMPANY,)
Defendants.)

NOTICE OF APPEAL

Notice is hereby given that the plaintiff Robert Lee Williams appeals to the United States Court of Appeals for the Fourth Circuit from the Order granting the defendant's Motion for Summary Judgment, to grant leave to amend complaint or in the alternative to remand case to lower court with instructions to grant leave to amend and to obtain legal counsel, and to repeal \$1,000.00 fee imposed, entered in this action on the 26th day of June, 1991.

Respectfully submitted,

Robert Lee Williams

ROBERT LEE WILLIAMS
Representative for the
Plaintiff (PRO SE)
104 McNeely Road
Columbia, SC 29223
(803) 788-5494 (After 5:30 pm)
(803) 748-3254 (8:30 am to 5:00 pm)

A TEL. CORR.

Attest: Ann A. Birch, Clerk

By: *Ann A. Birch*
Deputy Clerk

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

ROBERT LEE WILLIAMS,)
)
Plaintiff,)
)
vs.)

CIVIL ACTION NO. 3:90-1424-

23040960187
C. ERROL CATOE, Individually)
and as Executive Director of)
the South Carolina Licensing)
Board for Contractors; HARRY)
KENT, Individually and as)
Vice-Chairman of the South)
Carolina Licensing Board for)
Contractors; WALTER HUNTER,)
Individually and as a Board)
Member of the South Carolina)
Licensing Board for)
Contractors; GARY SHELTON,)
Individually and as a Board)
Member of the South Carolina)
Licensing Board for)
Contractors; JOHN T. WATKINS,)
Individually and as Director)
of the Home Builders)
Commission of South Carolina;)
ALICE C. BROADWATER,)
Individually and as Assistant)
Attorney General in charge of)
Civil Litigation for South)
Carolina; GEORGE K. LYALL;)
NINA NELSON SMITH; and MELODY)
RENEE BLACK, Individually and)
as Attorneys for Nelson,)
Mullins, Riley and Scarborough)
Law Firm; EDWARD MULLINS, JR.,)
Individually and as Partner)
and Attorney for Nelson,)
Mullins, Riley and)
Scarborough Law Firm; NELSON,)
MULLINS, RILEY AND)
SCARBOROUGH, Counselors and)
Attorneys at Law; C. VICTOR)
PLYE, JR., Individually and as)
Judge for the State of South)
Carolina; ROBERT SMALL, JR.,)
Individually and as owner of)
Avtex Properties, Inc./Avtex)

Construction Company; ALAN)
 HARDIN, Individually and as)
 Construction Manager for Avtex)
 Properties, Inc./Avtex)
 Construction Company; JAMES E.)
 KNIGHT, JR., Individually and)
 as Attorney for the Law)
 Offices of James E. Knight,)
 Jr.; THE LAW OFFICES OF)
 JAMES E. KNIGHT, JR.,)
 MICHAEL A. PULLIAM,)
 Individually and in his)
 capacity as Attorney for)
 Richardson, Plowden, Grier and)
 Howser Counselors and)
 Attorneys at Law; RICHARDSON,)
 FLOWDEN, GRIER and HOWSER)
 Counselors and Attorneys at)
 Law; JERRY D. SANDERS,)
 Individually and as Agent for)
 Maryland Casualty Company;)
 and MARYLAND CASUALTY COMPANY,)
 Defendants.)

APPEAL

The plaintiff respectfully submits that his complaint should not have been dismissed by the District Court for failure to state a claim unless it appeared to be an absolute legal certainty the plaintiff was not entitled to relief, including injunctive relief, under any set of facts he could prove by way of an amended complaint. The plaintiff therefore, submits that the entire basis for the Court's decision to dismiss his case was premised on error. All of the elements that the Court said was missing from the plaintiff's case were present in some form of pleading filed in this case. (See the attachments.)

The plaintiff respectfully submits, and with the highest degree of respect to and love for Magis Charles Gambrell,

that maybe Magistrate Gambrell abrogated his duty to remain impartial by becoming associated with a defensive posture in the case at hand. It appears that Magistrate Gambrell should have revealed to the Court that his son, Charles W. Gambrell, Jr., is the Chief Assistant Attorney General for the State of South Carolina working out of the Government and Civil Litigation Division. It would also appear that Magistrate Gambrell should have revealed to the Court any other present association with the Attorney General or his office, and with any of the other law firms or others involved in this case, if such associations would have impeded his ability to remain impartial.

The plaintiff further submits that it appears that Magistrate Gambrell may have mis-used his official position as a Magistrate to impose an undue influence upon him in order to influence his position on how to proceed. That the Honorable Magistrate in his Recommendation to the Court, page 10 beginning at line 3, states that the plaintiff's complaint contains "... lengthy factual allegations...", but includes a copy of Rule 11 (Sanctions) with his Order dated July 20, 1990. This Order was precipitated by the State defendants Catoe, Kent, Hunter, Shelton, Watkins, Broadwater, and Pyle by way of a Motion to Enlarge Time. No other answers or Motions to Dismiss had been filed by any of the defendants before this Order, and it appears that the entire defensive strategy of all the defendants may have been developed from this Order. From what the plaintiff can determine, every case cited by the Honorable Magistrate Gambrell to justify the imposition of Rule 11 Sanctions

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dealt with attorneys. The Honorable Magistrate Gambrell appears to not have had the authority to sanction nor impose attorney fees, nor suggest to the plaintiff that he should have signed Stipulation of Dismissal to relieve him of Rule 11 Sanctions and attorney fees. (See attachments, plus pages 7 to 10 and the first paragraph of page 11 of the Court Order.) Please observe especially the section of this Order on pages 9 and 10 where it states: "... Supreme Court has cautioned that 'Rule 11 is not a fee shifting statute.... A movant under Rule 11 has no entitlement to fee or any other sanction.'" Couter & Gell. Nor does Rule 11 create a federal common law of malicious prosecution. Id. "The main standard contained in Rule 11 requires the signer to make "reasonable inquiry" into both the factual assertions stated in a pleading motion, together with the legal premise upon which it is based."

The plaintiff respectfully submits that the misplacing of his Motion to Amend his Complaint filed on October 10, 1990 by the Honorable Magistrate Gambrell may have led to the Court's error in dismissing his case. Commencing at the last paragraph of page 5 of the Court's Order, it states: "Plaintiff next complains that at page 6, note 7, the Magistrate Judge noted that a Motion to Amend the Complaint "went unnoticed until recently" and he argues that the overlooking of his Motion to Amend has prejudiced his right to properly present his case. Plaintiff does not state the manner in which he was prejudiced. Indeed, it appears that the Magistrate Judge considered the amended complaint even though he observed that "it went unnoticed until recently." The plaintiff

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politely points out to the Court that it was not possible for the Magistrate Judge to consider his amended complaint in his Recommendation to the Court even though he observed that "it went unnoticed until recently", since the plaintiff never filed an amended complaint but only a Motion to Take Leave and Amend Complaint. It would appear that the Court would have freely granted the plaintiff the opportunity to try and amend his complaint even if it denied him, through the Honorable Magistrate Gambrell, the opportunity to engage licensed counsel to continue his case when it was determined by the plaintiff's physician, Dr. Greene B. Neal, Cardiology and Internal Medicine, that he was medically unfit, both physically and psychologically, to continue in and grasp the complex nature of the case, because he had developed temporary states of amnesia which was either a side effect of the psychological medication he was taking for depression and anxiety or a combination of all medications for various ailments, including malignant hypertension, vascular spasms, the most severe form of migraine headache, prostate gland and degenerated arthritis. (See especially the attached letter to the Honorable Magistrate dated September 14, 1990. See also a list of the plaintiff's various medications, his medical history from Dr. Neal and various other reports from hospitals and specialists which were filed with his complaint.)

The plaintiff additionally submits that earlier references to having his complaint amended was made on September 20, 1990, October 1, 1990 and October 9, 1990. (See second paragraph of page

2 and last paragraph of page 4 of Plaintiff's Response to Defendants, Catoe, Kent, Hunter, Shelton, Watkins, Broadwater, et al., Motion to Dismiss; Plaintiff's Response to Motion to Dismiss by Jerry D. Sanders and Maryland Casualty Company; undated letter to Judge Gambrell, hand delivered October 9, 1990.)

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The plaintiff would, moreover, respectfully submit to the Court that the Honorable Magistrate Gambrell, considering the plaintiff's physical and psychological problems aforementioned should not have suggested on several occasions that he sign Stipulation of Dismissal of Defendants Michael J. William and Richardson, Plowden, Grier and Howser, particularly when it clearly stated on their stationary letterhead that they operate or have membership in bars in at least Virginia and Florida, in order to avoid imposition of Rule 11 Sanctions and attorney fees. The plaintiff signed Stipulation on October 19, 1990. It appears to the plaintiff that the Court could have dismissed the case prior to suggesting to him to sign Stipulation if his case did not have merit. (See attachments.)

The plaintiff respectively challenges and contends that the Honorable Magistrate Gambrell and the Court subsequently erred by allowing Jerry D. Sanders and the Maryland Casualty Company to file a Motion to Dismiss pursuant to Rule 12(b)(6) some 50 or so days after filing their answer without any request to the Court to enlarge time. The plaintiff, from what he can determine from the various Orders issued by the Honorable Magistrate Gambrell, excluding this particular Motion, was allowed between 17 and 20

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days to respond to the various defendants' Motions or have his right to do so waived. The plaintiff, likewise, submits that Sanders and Maryland Casualty Company's Motion to Dismiss should be waived also, though he was asked to respond by the Honorable Magistrate Gambrell and did so. (See Court's Order beginning at last paragraph of page 3 to its completion on page 4.) Moreover, an abundance of evidence is included in the various Responses to Motions to Dismiss and other attachments, which the plaintiff believes, clearly suggest that Jerry D. Sanders and Maryland Casualty Company acquiesced in and/or willfully supported the production and introduction of manufactured evidence by Nelson, Mullins, Riley and Scarborough and its various attorneys, Richardson, Plowden, Grier, and Howser and its various attorneys. Alan Hardin, Robert S. Small, Jr., and James E. Knight, Jr., and various companies they represent, respectively, in judicial and judicial settings in violation of Section 38-59-20 (Improper Claim Practices) of South Carolina Insurance Laws, and in violation of what appears to be criminal laws. Attached documents reveal that J. D. Sanders and Maryland Casualty Company, along with their attorneys from Nelson, Mullins, Riley and Scarborough; and Richardson, Plowden, Grier and Howser, as well as their various engineers and inspectors, withheld and covered up serious electrical defect in the wiring to the plaintiff's electric range and to the home in general, which resulted in the plaintiff's oldest daughter receiving severe electrical shocks and having to

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be rushed to Richland Memorial Hospital. (See attachment from Richland Memorial Hospital as well as other attachments.)

The plaintiff respectively submits that the defendants Lyall, Smith, Black, Mullins and Nelson, Mullins, Riley and Scarborough manufactured and assisted others in the manufacturing of evidence which amounts to a criminal offense and subjects the manufacture to contempt powers of the Court. (See attachments.) The plaintiff further submits that Nelson, Mullins, Riley and Scarborough, Counselors and Attorneys at Law, may have more than a lawyer-client relationship with Avtex and its two agents, Robert S. Small, Jr., and Alan Hardin. There appears to exist a financial relationship with at least Attorney Dennis C. Gilchrist, PA, of this firm, and Avtex and its representatives. From what can be determined from certified copies of Articles of Incorporation, Avtex Properties, Inc., was derived from D. C. G. of Greenville, Inc. D. C. G. is believed to stand for Dennis G. Gilchrist, the incorporator, initial registered agent and initial board of director of same. With this appearing to be the case, and in light of the fact that former Governor Richard W. Riley, a partner in the law firm of Nelson, Mullins, Riley and Scarborough, appointed all of the Contractors' Board and Residential Home Builders Commissioners (except one) cited in his complaint, their representation of Avtex and unjustifiable civil abuse of the plaintiff, and consequently his family, before the Board and Circuit Court, was unlawful and should have been investigated by the Attorney General of South Carolina, who was repeatedly made

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aware of public corruption infractions. (See certified copies of Articles of Incorporation showing derivation of Avtex Properties, Inc., from D. C. G. of Greenville, Inc., plus other related Articles of Incorporation of other Avtex or associated companies, as well as stationary letterheads of Nelson, Mullins, Riley and Scarborough.)

The plaintiff submits that Avtex Properties, Inc., Avtex Construction Company, and Avtex Commercial Properties, Inc., belongs to a national corporation, C. T. Corporation System, registered agent, out of Wilmington, Delaware, organized and incorporated in Delaware on September 8, 1936, and is therefore diverse. Avtex is also associated with Pope Mortgage Company, the plaintiff's initial home mortgagee, a Delaware corporation, whose registered or principal office is located at 1209 Orange Street in Wilmington, Delaware, and whose registered agent is C. T. Corporation System. To the plaintiff's knowledge, Pope had his home inspected prior to closing. Avtex is also associated with the plaintiff's current mortgage company, BancBoston Mortgage Corporation out of Jacksonville, Florida, by way of C. T. Corporation System. There is diversity with Avtex. (See page 8 of Plaintiff's Memorandum of Exception to Recommendation to the Court, Articles of Incorporation from the State of North Carolina of Avtex Properties, Inc., Articles of Incorporation from the State of Delaware for Pope Mortgage Company and Articles of Incorporation with the names and addresses of all directors and officers attached for BancBoston Mortgage Corporation from the State of North

Carolina and copy of C. T. Corporation System qualification document to operate in South Carolina -- its registered agent Charles E. McDonald, Jr., and registered address, 75 Beattie Place, Two Shelter Center, Greenville, South Carolina 29601.)

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The plaintiff submits that this case was not filed out of frustration and/or anger as suggested in the Court's Order, page 10, 2nd paragraph, 8th line, "... it is evident that he has commenced this action out of anger and frustration. The Magistrate Judge reports on his several efforts to offer the plaintiff guidance on procedural matters; and he states that the plaintiff was unable to grasp the significance of some of the arguments made by the movant and that therefore has been unnecessarily prolonged." The plaintiff politely suggest that the Honorable Magistrate Gambrell may have prolonged this case unnecessarily by suggesting to the plaintiff on several occasions that he sign Stipulation of Dismissal, that he respond to a Motion to Dismiss by Sanders and Maryland Casualty Company filed some 50 or so days after the filing of their answer, without any request to the Court to enlarge time, and more importantly, by granting the State defendants up to October 26, 1990 to make a particular response, for which they have failed to do so to this very day. (See letter dated October 15, 1990 from Nauful & Ellis, plus attachments previously referenced.) The plaintiff filed this complaint because the State system failed to protect his Civil Rights and discriminated against him, including the Attorney General's Office by not investigating and/or prosecuting obvious public corruption cited by the plaintiff by way

of specific code of laws in some cases. (See attachments.) It is also the desire of the plaintiff that this Honorable Court, through injunctive relief, force the Attorney General's Office to make appropriate investigation of criminal acts, and force the various State agencies to provide the plaintiff documents denied him through the Freedom of Information Act.

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The plaintiff submits that it has always been his intention to have the Court review state administrative proceedings and this was the vehicle through which he wanted individuals "to be brought into accountability for denying him the opportunity to fully exercise his rights or privileges as a citizen of the State of South Carolina and the United States on an equal footing with the defendants." The plaintiff throughout his pleadings clearly express and allege racial discrimination and public corruption. (See page 6 of Court's Order commencing line 1.) The plaintiff's statement commencing at line 3, page 10 of his Memorandum of Exception, "The plaintiff realizes that administrative proceedings are not reviewable by this Court and this is not what the plaintiff has asked for in the complaint", was precipitated by the Honorable Magistrate Judge Gambrell's statement in the last 2 lines of footnote 18, page 13 of his Recommendation to the Court, "... and that decisions of a state administrative agency cannot be appealed to this Court." Even so, the plaintiff throughout his pleadings clearly cries out to the Court to review state administrative proceedings.

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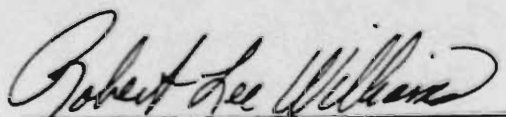
The plaintiff submits to this Honorable Court that the State defendants have violated his Civil Rights, discriminated against him and have violated what appears to be public corruption laws.

The plaintiff asserts that the State defendants' Motion to Dismiss and Rule 11 Sanctions contain some willful misrepresentation of facts, particularly in regards to the defendant Watkins. The plaintiff addresses these matters in his response and exception.

Research is continuing, and additional exhibits will be provided.

The plaintiff in conclusion request of this Honorable Court that leave be granted to amend complaint, or in the alternative, to remand the case to the lower court with instructions to grant leave to amend and to obtain legal counsel.

Respectfully submitted,



ROBERT LEE WILLIAMS
Representative for the
Plaintiff (PPO #1)
104 McNeel
Columbia, SC 29223
(803) 788-5494 (After 5:30 pm)
(803) 748-3254 (8:30 am to 5:00 pm)

United States Court of Appeals for the Fourth Circuit

Tenth & Main Streets
Richmond, Virginia 23219
(804) 771-2213
FTS 925-2213

DOCKETING STATEMENT

Caption of Case

Robert Lee Williams

4CCA Docket No. _____

Type of Action

☒ Civil
☐ Criminal/Prisoner
☐ Cross Appeal

v.

C. Errol Catoe, Et Al

District OF SOUTH CAROLINA

Judge MATTHEW J. PERRY

District Court Docket Number 3:90-1424-OH

Statute or other authority establishing jurisdiction in the:

District Court Title 42 Sect 1983; USC 28 Sect 1343; USC 28 Sect 1443; Pendency; 42

Court of Appeals SAME AS FOR DISTRICT COURT ABOVE

A. Timeliness of Appeal

1. Date of entry of judgment or order appealed from JUNE 26, 1991
2. Date this notice of appeal filed JULY 26, 1991
If cross appeal, date first notice of appeal filed _____
3. Filing date of any post-judgment motion filed by any party which tolls time under FRAP 4(a)(4) or 4(b) _____
4. Date of entry of order deciding above post-judgment motion _____
5. Filing date of any motion to extend time under FRAP 4(a)(5) or 4(b) _____
Time extended to _____

B. Finality of Order or Judgment

1. Is the order or judgment appealed from a final decision on the merits? yes (X) no ()
2. If no, a.) Did the district court order entry of judgment as to less than all claims or all parties pursuant to FRCP 54(b)? yes () no ()
b.) Is the order appealed from a collateral or interlocutory order reviewable under any exception to the finality rule? yes () no () I have examined the above rule but
If yes, explain Am not completely sure how I should answer
(Criminal only)
3. Has the defendant been convicted? yes () no ()
4. Has a sentence been imposed? yes () no () Term _____
5. Is the defendant incarcerated? yes () no ()

C. Has this case previously been appealed? yes () no (X)

If yes, give the case name, docket number and disposition of each prior appeal on a separate sheet.

D. Are any related cases or cases raising related issues pending in this court, any district court of this circuit, or the Supreme Court? yes () no (X)

If yes, cite the case and the manner in which it is related on a separate sheet.

E. State the nature of the suit, the relief sought, and the outcome below. The suit was filed in the District Court to recover damages from State Officials "For Deprivation of Rights and to recover damages from private individuals who conspired with the State, officials and staffs) to interfere with the plaintiff's civil rights in proceeding originating from the South Carolina Licensing Board from Contractor through which the Plaintiff filed a Complaint against his builder for faulty construction. The Plaintiff filed a suit with the State Court for which he included his Federal Suit under Pendent jurisdiction. Plaintiff sought relief for Intentional Infliction of Emotional Distress; Mental Anguish and Defamation of Character; Libel & Slander and for such other relief the court deemed necessary and proper. Case

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lack of or insufficient showing of Civil Rights Violations, or Racial Discrimination.

- F. Issues to be raised on appeal. Attach one additional page if necessary. (1) Plaintiff will show that many of elements that the Court said were missing from his case to merit Continuing were Present in some form of Pleading filed in the case (2) The Plaintiff will show that diversity exist with Autex, as well as Maryland Casualty Company, and that Partial diversity exist with Nelson, Mullins, Riley & Scarborough (3) The Plaintiff will also show that the Honorable Magistrate Judge, Charles W. Gamb. on more than one occasion suggested to the Plaintiff to sign Stipulation of Dismissal for Pulliam, and Richardson, Plowden, Grier & Howsen, who have a level of diversity as reflected on their various letter heads filed in the case to avoid Rule 11 Sanction and imposition of attorney fees (4) The Plaintiff will also show the Court that the Honorable Magistrate denied the Plaintiff the opportunity to bring in Counsel, after the Plaintiff's Physician, by way of letter written to Magistrate on September 14, 1990 by the Plaintiff, that he
- G. Is settlement being discussed? yes () no (X)
- H. Is disposition on motions, memoranda, or an abbreviated briefing schedule appropriate? yes () no () If yes, explain on a separate sheet. Is oral argument necessary? yes (X) no ()

- I. Were there any in-court proceedings below? yes () no (X)
Is a transcript necessary for this appeal? yes (X) no ()
If yes, is transcript already on file with district court? yes (X) no () If transcript is not already on file, attach copy 1 of transcript order.
- J. List each adverse party to the appeal. Attach additional sheets if necessary. If no attorney, give address and telephone number of the adverse party.

Autex Properties, Inc./Autex Construction Company, Nelson, Mullins, Riley & Scarborough,
Robert Small, Jr., Alan, Adrian, Melody Renee Block, Edward Mullins,
George K. Lyall & Nina Nelson Smith

1. Adverse party Fairley, Britton, Gibbs & Clarkson, P.A. (3)
Attorney N. Heyward Clarkson, III Carl B. Epps, III
Address 300 EAST COFFEE STREET 1901 Main Street
Telephone Post Office Box 10589 Post Office Box 1473
Greenville, SC 29603 Columbia, SC 29202
(803) 271-9580 (803) 254-2200

2. Adverse party Jerry D. Sanders & Maryland Casualty Company
Attorney Steven A. Snyder
Address 300 EAST NORTH STREET, Suite 2
PO Box 1036, FEDERAL STATION
Telephone Greenville, SC 29603-0367
(803) 242-2300

K. Appellant(s) Name Robert Lee Williams
If incarcerated, give identification number _____
Address (If incarcerated, give institution address) 104 McNeely Road, Columbia,
South Carolina 29223 Telephone (803) 788-5494
OR (803) 748-2254

L. Attorney or pro se litigant filing Docketing Statement. Will you be handling the appeal? (In criminal cases counsel below will handle the appeal unless relieved by this court.) yes (X) no ()
Name Robert Lee Williams Attorney () Pro se (X)
Firm _____
Address SAME AS IN "K" Telephone SAME AS ABOVE

If this is a joint statement by multiple appellants, add the names and addresses of other appellants and counsel joining in this Docketing Statement on an additional sheet, accompanied by a certification that all appellants concur in this filing.

Signature Robert Lee Williams

Date August 5, 1991

ATTACH:

1. ADDITIONAL PAGES, IF ANY, CONTAINING EXTENDED ANSWERS TO QUESTIONS ON THIS FORM.
2. A COPY OF THE ORDER OR JUDGMENT FROM WHICH THE APPEAL IS TAKEN.
3. COPY 1 OF THE TRANSCRIPT ORDER, IF ANY.
4. A CERTIFICATE OF SERVICE

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F. (CONTINUED)

was medically, Physically & Psychologically; Unable to continue in the Case, Particularly since he had developed temporary states of amnesia and was unable to fully grasp the content of documents (5) The Plaintiff will show that the Honorable Magistrate Gambrell could not have considered the Plaintiff's Amended Complaint in his Recommendation to the Court, as suggested in the Court's Judgement Order, since the Plaintiff never filed an Amended Complaint, but only a Motion to Take Leave and Amend Complaint; the Plaintiff will attempt to show that the Court may have erred by not allowing the Amending of the Complaint before Dismissing Case; the Plaintiff will show that references to having his Complaint amended were made on September 20, 1990, October 1, 1990 and October 9, 1990, as well as October 10, 1990 (Plaintiff sign Stipulation of Dismissal for Pulliam & Richardson, Plowden, Green & Howser on October 13, 1990) (6) The Plaintiff will show that the Honorable Magistrate Gambrell and the Court, subsequently, erred by allowing Jerry DeSander, & Maryland Casualty Company to file a Motion to Dismiss pursuant to Rule 12(b)(6) some 50 or so days after filing their answer without any request to the Court to enlarge time when the Plaintiff was given 17 to 20 days to respond to various Motions, or have his right to de Se waived; (7) The Plaintiff will also raise the issue that the Honorable Magistrate Gambrell may have abrogated his duty to remain impartial by becoming associated with a defensive posture in the Case; Maybe Magistrate Gambrell should have revealed to the Court that his son, Charles W. Gambrell, Jr. is Chief Assistant Attorney General for the State of South Carolina working out of the Government and Civil Litigation Division (8) Plaintiff will raise the issue that Magistrate Gambrell may have mis-used his official position as a Magistrate to impose an undue influence upon him in order to influence his position on how to proceed; the Plaintiff will also raise the issue that every Case law, to the Plaintiff's best knowledge, cited by Magistrate Gambrell to impose Rule 11 Sanction and Attorneys fees upon the Plaintiff dealt with Attorneys (9) Plaintiff will also raise issue regarding lack of response to Court, to this very day, by Attorneys for the State Defendants which, in part, led to unnecessary delay in Case (10) Plaintiff will show that Jerry D. Sanders & Maryland Casualty Company acquiesced in and/or Willfully supported the production & Introduction of Manufactured evidence by attorneys and others involved in this Case (11) The Plaintiff will also show a former or current financial relationship between a Partner in Nelson, Mullins, Riley & Scarborough, who represented Autex before Contractors

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J. (continued)

- (4) C. Errol Catoe, Individually and as Executive Director of the South Carolina Licensing Board for Contractors; Harry Kent, Individually and as Vice-Chairman of the South Carolina Licensing Board for Contractors; Walter Hunter, Individually and as a Board Member of the South Carolina Licensing Board for Contractors; Gary Shelton, Individually and as a Board Member of the South Carolina Licensing Board for Contractors; John T. Watkins, Individually and as Director of the Home Builders Commission of South Carolina; Alice C. Broadwater, Individually and as Assistant Attorney General in Charge of Civil Litigation for South Carolina; C. Victor Pyle, Jr., Individually and as Judge for the State of South Carolina

Attorney: William H. Davidson, II

Address: 1901 Gadsden Street
Post Office Box 2285
Columbia, SC 29202

Telephone: (803) 254-4190

6

Office of the Attorney General of South Carolina
Edwin E. Evans, Chief Deputy Attorney General
Rembert C. Dennis Building
Post Office Box 11549
Columbia, SC 29211
(803) 734-3970

Robert Williams
104 McNeely Road
Columbia, SS 29223
September 3, 1991

The Honorable John M. Greacen
Clerk of Court for U.S. Court
of Appeals for the Fourth Circuit
United States Courthouse
Tenth and Main Streets
Richmond, Virginia 23219

Re: Robert Lee Williams v. C. Errol Catoe, et al
Fourth Circuit Docket Number 91-2173
Civil Action No. 3:90-1424-oh

Dear Mr. Greacen:

I enclose herewith the original and copy of the Appellant's
informal brief as of the above date has been served
upon the counsels below by way certified mail, return receipt
requested.

I apologize to the Court for hand writing the brief the way I
did. I thought I had made a copy of the document, but when I realized
I did not, it was too late for I had nearly completed the brief. I
will type out another brief if the Court so desires, and if I am sent
another form.

With kind regards,

Sincerely,

Robert Lee Williams
Robert Lee Williams

RLW:rlw

Enclosure

93040960203

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

91-2173 Williams v. Catoe
CA-90-1424-OH

INFORMAL BRIEF

Directions: Answer the following questions about the appeal to the best of your ability. Use additional sheets of paper, if necessary. You need not limit your brief solely to this form but you should be certain that whatever you file answers the questions below. In any event, the court prefers short and direct statements.

1. Did the district court fail to consider important grounds for relief. If so, what grounds? YES.

ALL ELEMENTS, I BELIEVE, THE COURT SAID WERE MISSING FROM THIS CASE TO JUSTIFY SOME FORM OF RELIEF, INCLUDING INJUNCTIVE RELIEF TO COMPEL THE ATTORNEY GENERAL TO TAKE ACTION AGAINST PUBLIC CORRUPTION AND OTHER CRIMES, WERE PRESENT IN THE CASE IN SOME FORM OF PLEADING.

2. Did the district court incorrectly decide the facts? If so, what facts? YES.

(a) COURT DISMISSED CASE ON THE GROUND THAT THERE WAS NO DIVERSITY (b) ON THE GROUNDS THAT IT LACKED JURISDICTION (c) ON THE GROUNDS THAT THERE WAS NO CIVIL RIGHTS VIOLATION, AND CONSEQUENTLY NO 14th AMENDMENT VIOLATION, AND THEREFORE, NO CLAIM UNDER 42 USC 1983 AND 42 USC SECTION 1985

3. Do you think the district court applied the wrong law? If so, what law do you want applied? YES.

— 28 USC SECTION 1332(a)
— 28 USC SECTION 1331
— 28 USC SECTION 1343
— 42 USC SECTION 1985
— 42 USC SECTION 1983
— IF POSSIBLE, CIVIL APPLICATION OF RICO CONSPIRACIES (RACKETEER INFLUENCE AND CORRUPT ORGANIZATIONS ACT OF 1970)
— IF POSSIBLE, 18 USC 241

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4. Do you feel that there are any other reasons why the district court's judgment was wrong? If so, what?
 YES. THE COURT DISMISSED MARYLAND CASUALTY COMPANY, & JERRY SANDERS OF SAME, BASED UPON THEIR MOTION TO DISMISS ACCORDING TO RULE 6(b) WHICH WAS FILED SOME 50 OR 50 DAYS AFTER FILING THEIR ANSWER WITHOUT ANY REQUEST TO THE COURT TO ENLARGE TIME, IN VIOLATION OF COURT RULES AND A PRIVILEGE NOT GIVEN ME. THE COURT IN GENERAL APPEARS TO HAVE TAKEN A DEFENSIVE POSTURE IN THIS CASE AND ABROGATED ITS ABILITY TO REMAIN IMPARTIAL: THE SON OF THE HONORABLE MAGISTRATE GAMBRELL, CHARLES W. GAMBRELL, JR., IS CHIEF ASSISTANT ATTORNEY GENERAL FOR THE STATE OF SOUTH CAROLINA.
5. What action do you want the Court to take in this case? I WOULD LIKE FIRST OF ALL FOR THE COURT TO PAY THE \$1,000.00 FEE IMPOSED BY THE DISTRICT COURT; SECONDLY, AFTER THE COURT EXAMINES THE FACTS, AND PERHAPS DETERMINES THAT IT SHOULD NOT HAVE BEEN DISMISS BY THE DISTRICT COURT, THAT IT HEAR THE CASE INSTEAD OF SENDING THE CASE BACK TO THE DISTRICT COURT, IF THIS IS A REASONABLE REQUEST AND WITHIN THE JURISDICTION OF THE COURT. I KNOW THIS IS A SLIGHTLY DIFFERENT REQUEST FROM WHAT IS STATED IN MY NOTICE OF APPEAL, BUT I AM NOT SURE OF ANYTHING AT THIS POINT. I WOULD ALSO REQUEST OF THE COURT THAT IT CONSIDER OR RECOMMEND DISCIPLINARY MEASURES FOR ATTORNEYS WHO HAVE ENGAGED IN MISCONDUCT IN VIOLATION OF THEIR DUTY OF OFFICE.
6. If you think the Court should hear oral argument in this case, why do you think so? I BELIEVE THAT ORAL ARGUMENT IS NECESSARY BECAUSE INFORMATION REGARDING ASSOCIATE CORPORATIONS INVOLVED IN THIS CASE (MERGER(S), DISSOLUTION(S), NAME CHANGE(S)), THOUGH ORDERED, HAS NOT BEEN RECEIVED AT THE COMPLETING OF THIS DOCUMENT. ORAL ARGUMENT WILL BE NECESSARY TO EXPLAIN MUCH OF THE TECHNICAL OR STRUCTURAL REPORTS TO GIVE THE COURT A CLEARER PICTURE OF THE SERIOUS INFRACTIONS IN JUSTICE THAT HAS OCCURRED, AND THE FAILURE PERSONS WHO COULD HAVE PREVENTED THEM, TO DO SO.

Robert Lee Williams

Signature
 NOTARY NOT REQUIRED

September 3, 1991

IMPORTANT: A COPY OF THIS BRIEF AND ANY ATTACHMENTS MUST
 BE SENT TO ALL PARTIES IN THE CASE. PLEASE LIST BELOW THE
 NAMES AND ADDRESSES OF THE PARTIES WHO WERE SENT A COPY
 OF YOUR BRIEF, TOGETHER WITH THE DATES ON WHICH THEY WERE SENT.

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DARRELL JACKSON...

INNOVATIVE and PROGRESSIVE LEADERSHIP

Experience:

Member of the Board of Directors, Sistercare, Inc.
Member of the Alcohol-Safe Communities Task Force
Member of the Mayor's Task Force ("Fighting Back")
Member of the Richland School District One
After-Care Task Force
Member of the Meadowfield Elementary School
Endowment Foundation
Member of the Columbia Chamber of Commerce
Public Relations Committee

Leadership:

Trustee for United Way of the Midlands
Executive Director of the S.C. Coalition of Black
Church Leaders, Inc.
Chairman of the Public Relations Committee for the
S.C. Branch of the NAACP
Founding Partner/Co-Owner of Sunrise Enterprise of
Columbia, Inc.
Assistant Pastor of the Bibleway Church of Atlas Road

Education:

Received a B.A. Degree in Public Administration
from Benedict College
Attended University of South Carolina School of Law
Received a M.A. in Theology from Columbia Bible
College and Seminary

Family:

Darrell is married to Willie Mae Rooks. They
have two sons, D.J., age 8 and Antoine Joseph, age 5.

For more information contact:

Darrell Jackson

P.O. Box 3076 • Columbia, S.C. 29230 • 771-0325



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1992

Robert Lee Williams
104 McNeely Road
Columbia, South Carolina 29223

RE: MUR 3534

Dear Mr. Williams:

This letter acknowledges receipt on June 1, 1992, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Darrell Jackson, Bishop A.C. Jackson, Sunrise Enterprise of Columbia, Inc., and Clinton for President Committee, Robert A. Farmer, as treasurer. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3534. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein
Assistant General Counsel

Enclosure
Procedures

93040960207



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1992

Robert A. Farmer, Treasurer
Clinton for President Committee
Post Box 615
Little Rock, Arkansas

RE: MUR 3534

Dear Mr. Farmer:

The Federal Election Commission received a complaint which indicates that Clinton For President Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3534. Please refer to this number in all future correspondence.

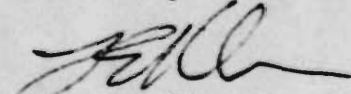
Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Clinton For President Committee and you, as treasurer in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040960209



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1992

The Reverend Bishop A.C. Jackson
2932 Dell Drive
Columbia, South Carolina 29209

RE: MUR 3534

Dear Bishop Jackson:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3534. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

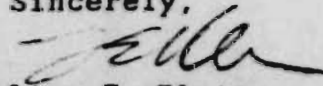
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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Page 2

If you have any questions, please contact Veronica Gillespie, the attorney assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

23040960211



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 5, 1992

Darrell Jackson
2936 Dell Drive
Columbia, South Carolina 29209

RE: MUR 3534

Dear Mr. Jackson:

The Federal Election Commission received a complaint which indicates that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3534. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

93040960213



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 5, 1992

Sunrise Enterprise of Columbia, Inc.
Heyward Bannister, Registered Agent
1111 Belview Street
Suite 103
Columbia, South Carolina 29204

RE: MUR 3534

Dear Mr. Bannister:

The Federal Election Commission received a complaint which indicates that Sunrise Enterprise of Columbia, Inc. ("Committee") and you, as registered agent, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3534. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against Sunrise Enterprise of Columbia, Inc. and you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

93040960214

Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

23040960215

JUN 22 12 39 PM '92

CROMER & MABRY
Attorneys and Counselors at Law
1225 PICKENS STREET
COLUMBIA, SOUTH CAROLINA 29201

J. LEWIS CROMER
BENJAMIN M. MABRY

J. L. MANN CROMER, JR. *

June 16, 1992

MAILING ADDRESS:
P.O. Box 11675
COLUMBIA, SOUTH CAROLINA 29211-1675
TELEPHONE 803-799-9530
FAX 803-799-9533

* Also admitted in
California & District of Columbia

CERTIFIED

Lisa E. Klein
Assistant General Counsel
Federal Election Commission
Washington DC 20463

RE: MUR 3534
Complaining Party: Robert Williams
Respondents: Darrell Jackson and Bishop Andrew C.
Jackson

Dear Ms. Klein:

The undersigned attorney represents Bishop Andrew C. Jackson and Darrell Jackson in the above matter. I enclose herewith designation of counsel forms which have been executed by both parties. As you have likely surmised from reading the voluminous handwritten correspondence by Reverend Williams which forms a part of the history of this sordid matter, the complainant unfortunately is a malcontent former member of Bible Way of Atlas Road Church and for the last year has been involved in a personal vendetta against my two clients who occupy positions of leadership within the church. There is absolutely no basis to any of his allegations and my clients have done everything possible to befriend Reverend Williams and help him over the years only to have him continuously try to chop them off at the knees.

I am enclosing herewith affidavits from both Bishop Jackson and Darrell Jackson outlining their response in this case and also enclose a copy of the contract between Sunrise and the Bill Clinton Campaign and a typical detailed invoice outlining the payment of one month's expenses. Of course should the commission wish to pursue

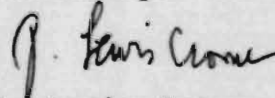
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
JUN 22 PM 3:07

93040960216

the matter further we will be happy to make all of
Sunrise's records and bank documents available to you.

Please let me know if anything further is required from us
at this time and we will await your advice accordingly.

Sincerely,



J. Lewis Cromer

JLC/nbm
Enclosures

93040960217

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3534

NAME OF COUNSEL: J. Lewis Cromer

ADDRESS: 1225 Pickens Street
Columbia SC 29201

TELEPHONE: 803-799-9530

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

6-15-92
Date

Darrell Jackson
Signature

RESPONDENT'S NAME: Darrell Jackson

ADDRESS: 2936 Dell Dr.
Columbia, S.C. 29209

HOME PHONE: (803) 776-6954

BUSINESS PHONE: (803) 776-0325

93040960218

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3534

NAME OF COUNSEL: J. Lewis Cromer

ADDRESS: 1225 Pickens Street
Columbia SC 29201

TELEPHONE: 803-799-9530

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

6-15-92
Date

Bishop Andrew C. Jackson
Signature

RESPONDENT'S NAME: Bishop Andrew C. Jackson

ADDRESS: 2932 Dell Dr.
Columbia, SC 29209

HOME PHONE: (803) 776-6692

BUSINESS PHONE: (803) 776-1238

93040960219

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

AFFIDAVIT

PERSONALLY appeared before Darrell Jackson who,
first being duly sworn, deposes and states:

1. That he is the assistant pastor of the Bible
Way Church of Atlas Road in Columbia, South Carolina.

2. That the church is part of the National
Holiness Apostolic Ministry.

3. That the undersigned has been an assistant
pastor this church for many years and that such church is
supervised by a trustee board who act upon and oversee the
activities of the church.

4. That the undersigned is personally familiar
with Robert Williams who at one time was a member of this
church but who has never served on the trustee board or in
any significant leadership role in the church itself.

5. That the undersigned and his father Bishop A.C.
Jackson are presently the sole stockholders of Sunrise
Enterprise of Columbia, Inc., a South Carolina corporation
which was chartered on December 4, 1986. Such corporation
has nothing whatsoever to do with Bible Way Church of Atlas
Road or any other religious organization. As the charter,
filed as an exhibit with Mr. Williams' complaint, indicates,
the purposes of the corporation were to be involved in
various businesses and activities including the janitorial

business and for consulting. The corporation has not been involved in the janitorial business over the last several years and has been primarily in the business of consulting and for public relations work, including on occasion the handling of political candidates and campaigns seeking elective office.

6. Heyward Bannister was formerly a stockholder of Sunrise but, as indicated in Williams' complaint, transferred his stock and formed his own company earlier this year. However, his decision had nothing whatsoever to do with the Bill Clinton campaign nor with Bible Way Church.

7. That the Clinton Campaign did in fact sign an agreement with Sunrise to pay Sunrise stipulated funds for professional and consulting services in December 1991. A copy of the agreement is attached hereto as Exhibit A.

8. That the Clinton Campaign paid Sunrise \$3,000 upon the signing of the agreement and has paid installments of \$1,500^{bi-2} monthly for four months from February of 1992 to May of 1992. That all funds paid by the Clinton Campaign were disbursed by Sunrise in accordance with detailed invoices as represented by Exhibit B which is the invoice dated March 9, 1992. Other invoices and records are available for inspection including bank records of deposits and checks. No checks nor funds of any kind from the Clinton Campaign were ever paid to Bible Way Church or to any other

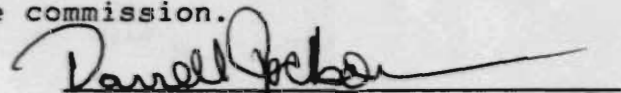
23040960222

church or religious organization for any purpose and certainly no funds were paid to any persons or organizations for the purpose of directly buying votes or otherwise contravening the provisions of the Federal Election Campaign Act of 1971. Deponent is a member of the Richland County School District 1 Board of Trustees and is presently a candidate for the state senate. Both the undersigned and his father know and recognize the provisions of the Federal Election Act and have always conducted themselves and continue to conduct themselves in a professional and dignified manner in keeping with both the letter and the spirit of such law.

9. That for reasons unknown to the undersigned, Robert Williams has become bitter and disenchanted with not only Bible Way Church but with most of the public officials and public institutions of government in South Carolina. He has attached as a part of his complaint a lawsuit which he brought in 1990 against numbers of public officials (but not against either the deponent or his father, significantly) where he charged a plethora of civil rights and other violations. His case was dismissed by the United States Magistrate Judge and the dismissal was affirmed by United States District Judge Matthew J. Perry and the Fourth Circuit Court of Appeals. He started in on us in earnest after this case was dismissed and I attach two letters as Exhibit C that

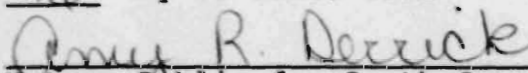
he did not send to you dated April 13, 1992 and April 20, 1992. These letters reflect Mr. Williams' irrational hatred toward the undersigned and Bishop A.C. Jackson. The undersigned has no explanation as to why Mr. Williams feels as he does toward deponent and the host of others reflected by his numerous charges and complaints over the last three years.

10. The undersigned categorically denies any suggestion that he has participated in the "buying of votes" for either Governor Clinton or anyone else and that there simply is no basis or foundation for such a charge. The undersigned further will be happy to have the commission or its representative inspect its financial records or bank accounts but denies that the complainant has produced any evidence in this matter which would justify any type of further investigation by the commission.


DARRELL JACKSON

SWORN to before me this

16 day of June, 1992


Notary Public for South Carolina
My Commission Expires: 12-5-95

AGREEMENT

AGREEMENT made this 15 day of December, 1991,
between the Clinton Exploratory Committee ("Committee")
and Surprise Enterprise of Columbia, Inc. ("Contractor").

1. Committee contracts with Contractor to provide independent consulting services in connection with Governor Clinton's presidential exploratory efforts upon the terms and conditions hereinafter set forth.

2. Contractor shall have access to the Committee's offices, equipment and files; but it is expressly understood that all information and conversations are proprietary to the Committee and shall not be disclosed or turned over to anyone else.

3. Committee shall pay to Contractor and Contractor agrees to accept as compensation for Contractor's services the sum of \$ 3,000 per month. Contractor agrees to comply with all applicable laws and regulations and assumes and agrees to pay all contributions, taxes and assessments incident to income taxes, Social Security, unemployment compensation or similar laws. Contractor agrees to indemnify and hold the Committee harmless from any and all liability, claims or causes of action as a result of Contractor's failure to pay.

4. This Agreement is not assignable or transferable and may be terminated by either party by verbal notification.

5. Contractor is engaged only for the purposes and to the extent set forth in this Agreement, and Contractor's

23040960224

relationship to Committee shall be that of an independent contractor. When not performing services pursuant to this Agreement, Contractor shall be free to devote Contractor's time and attention to such activities as Contractor chooses.

CLINTON EXPLORATORY COMMITTEE

By

JaylatterSunrise Enterprise of Columbia, Inc.X. Hays and Bannister

CONTRACTOR

Su.

4827H

93040960225

SUNRISE
Enterprise of Columbia, Inc.

P.O. Box 3076
1215 Anthony Avenue
Columbia, South Carolina 29230
(803) 771-0325

Public Relations ☐ Marketing ☐ Consulting

Invoice No. HC001

Date March 9, 1992

FEID #57-0835405

[To:]
Mr. Doug Heyl
Clinton For President
P.O. Box 615
Little Rock, Arkansas 72203
[]

PAID
3-20-92

QUANTITY	DESCRIPTION	UNIT PRICE		TOTAL	
93040960226	Expenses incurred as a result of the Bill Clinton For President Campaign.	\$1572	49		
	TOTAL AMOUNT DUE AND PAYABLE				\$1,572.49 =====
	PLEASE SEE ATTACHMENTS				

BILL CLINTON FOR PRESIDENT
EXPENDITURE ACCOUNT

QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL
1	SIGN FOR HDQTRS.	\$ 350.00	\$ 350.00
1	CAR RENTAL	24.10	24.10
550	STAMPS @ .29	159.50	159.50
405	FACSIMILES @ .75	303.75	303.75
2	FLYERS	42.00	42.00
2	SHPMTS. OF CAMP. LIT.	25.05	25.05
	LONG DISTANCE TEL.	250.09	250.09
2	OVERNIGHT PKGS.	31.00	31.00
	ENTERTAINMENT	50.18	50.18
	TRAVEL	176.39	176.39
	TELEGRAM	40.95	40.95
412	POSTAGE @ .29	119.48	119.48
	TOTAL EXPENSES		\$1572.49

PLEASE SEE ATTACHMENT FOR EXPLANATION.

/BILLCLIN.INV

93040960227

Robert Williams
104 Mc Neely Rd
Columbia, SC 29223

April 13, 1992

Bishop A. C. Jackson,
Bibleway Church
PO Box 90401
Columbia, SC 29290

Dear Bishop Jackson:

Re: Matters Pertaining to Letter to Bishop
Campbell, Etc. Dated April 9, 1992

I would appreciate very much if you
or any of your Executive Trustees or
Trustees contact me by telephone as
expressed in my most recent letter.
The only person that I have any confidence
and trust in currently on your staff
is Deacon Myrl Heyward. I
will only speak to him and him
only by telephone. If necessary, I'll
get a restraining order to prevent anyone
other than Deacon Heyward from calling
me until I am prepared to receive calls.
Sincerely, Robert Williams

Robert Williams
104 Mc Neely Rd
Columbia, SC 29223



Bishop A. C. Jackson
Bibleway Church
P.O. Box 90401
Columbia, SC 29290

Robert A. Williams
104 McNeely Rd
Columbia, SC 29223
April 20, 1992

Bishop A. C. Jackson,
The Executive Trustees,
Trustees & Bibleway Church Family
2440 Atlas Road
PO Box 90401
Columbia, SC 29290

Dear Bishop Jackson and Trustees/
memberships:

With the exception of maybe two of
your Executive Trustees/Trustees, none
of you when you were made aware
of our suffering attempted to help
us, and in fact tried to dissuade
us from doing that which was just
with respect to matters surrounding
our Federal Lawsuit and US Justice
Department investigation. All of you,
especially you and Darrell Jackson,
breached your Biblical contract with
us by your actions and most
importantly, your lack of action regard-
ing our situation. Your son, Darrell is
one of the most dishonest and slick

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persons I ~~have~~ ever met and I have
all kinds of incredible evidence to prove
so. you unfortunately, as well as others
outside of your Church, have allowed
yourselves to become involved in
Darell's Godless schemes.

3
2
1
Because you and especially Darell have
fully known of our flight since
1989, along with nearly all of the other
mentioned above and have willfully done
nothing and in essence have broken
your Biblical contract with us, we
demand all of the money back that
we have contributed to the Bibleway
Church of Atlas Road since 1989 to
1992, under this Biblical contract, immediately.
We will not compromise and will do
everything within the scope of the law
to ensure that justice is rendered.

The conditions of my previous correspondence
are still effective.

Sincerely,

Robert Williams

PS I look ^{forward} to hearing from you and your Trustees
by 4/27/92, in writing. If I don't hear from you
I will take the matter to the courts.

93040960232
Darrell especially and you can be assured
that a lawsuit will follow shortly if
nothing is done. I blame you and your
Executive Trustees and Trustees for putting
Darrell in a position in your church
where he is now destroying the church
with his vile ways. I had been trying
to warn you all for years and you rejected
me. I tried to resolve this matter
among brethren, but you all treated me
less than a brother because of political,
financial and other reasons and now I,
therefore, must go before secular men
of law for resolution.

If you and others are emotionally hurt by
what is occurring now, I would respectfully
ask that Darrell and you consider the
hurt that you have caused us by multiplying
your hurt 40 times; you now have our
level of hurt. I am holding you, your
Executive Trustees and Trustees and especially
your son, Darrell Jackson personally for
allowing a dishonest atmosphere to exist
whereby we were driven and expelled from
your church a second time. You and
Darrell had better be very careful for
there have been a number of leaders from
the AME Church and Baptist organization
who have personally come to me to try and
talk to you and Darrell about interfering with

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their Church policies. Some have suggested to me that Darrell, with your support, have attempted to use their Churches as a means of improperly placing Darrell in a position where he would have an advantage over others seeking political offices. Some have questioned ethical violations and possible Federal & State violations with respect to the Coalition of Black Church Leaders, Project ADAM and your Corporation, Sunrise. Representatives from the A.M.E. Church have made it clear that you nor Darrell should attend their convention to attempt to get their by-laws amended to keep Bishop James in South Carolina for Darrell's and others benefit. You can count on this one thing: I will not let you or Darrell bring disgrace to the "Church of God In Christ" organization. I don't take anything at face value and I have certainly evaluated and researched the various complaints made to me and have found them to be for the most part. I would suggest that you & Darrell completely resolve matters with Sisterwell Middleton of "For the People"; there is a great deal of concern among Blacks with what you all and Sunrise attempted to do on behalf of some others and the whole situation may resurface publicly between now and November; if you don't know the details, ask your son.

Darrell, and consequently you and your Trustees have allowed this Church to be sold to the "Highest Bidder," and your actions are identical to the political-Religious atmosphere that is to exist in these End Times.

23040960234
You and Darrell need to understand that I have relatives who are respected leaders in the AME, the Baptist and the Church of God in Christ Churches... Darrell and you need to be very careful with whom you discuss certain matters with.

When you, Bishop, were nothing in the eyesight of secular men, you were great in the eyesight of God. Now you have become somewhat great in the eyesight of secular men and have less greatness in the eyesight of God. All of this happened when you and your trustees allowed and put Darrell a Novice, in a position to direct this Church from faith to political expediency.

Please understand that my position with respect to Darrell and his unlawful political pursuits have intensified because of various documents that keep turning up. You and your political friends should know by now that I am on a mission for God and that I will do whatever I said I would do.

Darrell, by his arrogance, just as Pharaoh of Egypt, spoke the very words which has resulted in all of what is happening today... You should remember Eli & his sons.

Please understand that the only person on your Executive Trustee and Trustee Board ^{that I will speak to} by telephone at this time is Deacon Merv Heyward. You, Darrell & others will not escape your Bill

Robert Williams
104 Mc Neely Road
Columbia, SC 29223

Bishop H. C. Jackson
The Executive & General Trustees
& the Ridbury Church Family
Ridbury Church of Hillside Road
P.O. Box 90401
Columbia, SC 29290



93040960235

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

AFFIDAVIT

PERSONALLY appeared before Bishop A.C. Jackson who,
first being duly sworn, deposes and states:

1. That he is the pastor of the Bible Way Church
of Atlas Road in Columbia, South Carolina.

2. That the church is part of the National
Holiness Apostolic Ministry.

3. That the undersigned has pastored this church
for many years and that such church is supervised by a
trustee board who act upon and oversee the activities of the
church.

4. That the undersigned is personally familiar
with Robert Williams who at one time was a member of this
church but who has never served on the trustee board or in
any significant leadership role in the church itself.

5. That the undersigned and his son Darrell
Jackson are presently the sole stockholders of Sunrise
Enterprise of Columbia, Inc., a South Carolina corporation
which was chartered on December 4, 1986. Such corporation
has nothing whatsoever to do with Bible Way Church of Atlas
Road or any other religious organization. As the charter,
filed as an exhibit with Mr. Williams' complaint, indicates,
the purposes of the corporation were to be involved in
various businesses and activities including the janitorial

business and for consulting. The corporation has not been involved in the janitorial business over the last several years and has been primarily in the business of consulting and for public relations work, including on occasion the handling of political candidates and campaigns seeking elective office.

6. Heyward Bannister was formerly a stockholder of Sunrise but, as indicated in Williams' complaint, transferred his stock and formed his own company earlier this year. However, his decision had nothing whatsoever to do with the Bill Clinton campaign nor with Bible Way Church.

7. That the Clinton Campaign did in fact sign an agreement with Sunrise to pay Sunrise stipulated funds for professional and consulting services in December 1991. A copy of the agreement is attached hereto as Exhibit A.

8. That the Clinton Campaign paid Sunrise \$3,000 upon the signing of the agreement and has paid installments of \$1,500^{ack bi -} monthly for four months from February of 1992 to May of 1992. That all funds paid by the Clinton Campaign were disbursed by Sunrise in accordance with detailed invoices as represented by Exhibit B which is the invoice dated March 9, 1992. Other invoices and records are available for inspection including bank records of deposits and checks. No checks nor funds of any kind from the Clinton Campaign were ever paid to Bible Way Church or to any other

church or religious organization for any purpose and certainly no funds were paid to any persons or organizations for the purpose of directly buying votes or otherwise contravening the provisions of the Federal Election Campaign Act of 1971. Deponent serves on several public boards and commissions and deponent's son is a member of the Richland County School District 1 Board of Trustees and is presently a candidate for the state senate. Both the undersigned and his son know and recognize the provisions of the Federal Election Act and have always conducted themselves and continue to conduct themselves in a professional and dignified manner in keeping with both the letter and the spirit of such law.

9. That for reasons unknown to the undersigned, Robert Williams has become bitter and disenchanted with not only Bible Way Church but with most of the public officials and public institutions of government in South Carolina. He has attached as a part of his complaint a lawsuit which he brought in 1990 against numbers of public officials (but not against either the deponent or his son, significantly) where he charged a plethora of civil rights and other violations. His case was dismissed by the United States Magistrate Judge and the dismissal was affirmed by United States District Judge Matthew J. Perry and the Fourth Circuit Court of Appeals. He started in on us in earnest after this case was dismissed and I attach two letters as Exhibit C that he did

not send to you dated April 13, 1992 and April 20, 1992. These letters reflect Mr. Williams' irrational hatred toward the undersigned and Darrell Jackson. The undersigned has no explanation as to why Mr. Williams feels as he does toward deponent and the host of others reflected by his numerous charges and complaints over the last three years.

10. The undersigned categorically denies any suggestion that he has participated in the "buying of votes" for either Governor Clinton or anyone else and that there simply is no basis or foundation for such a charge. The undersigned further will be happy to have the commission or its representative inspect its financial records or bank accounts but denies that the complainant has produced any evidence in this matter which would justify any type of further investigation by the commission.

Bishop A.C. Jackson
BISHOP A.C. JACKSON

SWORN to before me this

16 day of June, 1992
Amy R. Derrick
Notary Public for South Carolina
My Commission Expires: 12-5-99

AGREEMENT

AGREEMENT made this 15 day of December, 1991,
between the Clinton Exploratory Committee ("Committee")
and Surprise Enterprise of Columbia, Inc. ("Contractor").

1. Committee contracts with Contractor to provide independent consulting services in connection with Governor Clinton's presidential exploratory efforts upon the terms and conditions hereinafter set forth.

2. Contractor shall have access to the Committee's offices, equipment and files; but it is expressly understood that all information and conversations are proprietary to the Committee and shall not be disclosed or turned over to anyone else.

3. Committee shall pay to Contractor and Contractor agrees to accept as compensation for Contractor's services the sum of \$ 3,000 per month. Contractor agrees to comply with all applicable laws and regulations and assumes and agrees to pay all contributions, taxes and assessments incident to income taxes, Social Security, unemployment compensation or similar laws. Contractor agrees to indemnify and hold the Committee harmless from any and all liability, claims or causes of action as a result of Contractor's failure to pay.

4. This Agreement is not assignable or transferable and may be terminated by either party by verbal notification.

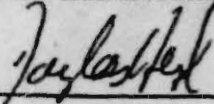
5. Contractor is engaged only for the purposes and to the extent set forth in this Agreement, and Contractor's

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relationship to Committee shall be that of an independent contractor. When not performing services pursuant to this Agreement, Contractor shall be free to devote Contractor's time and attention to such activities as Contractor chooses.

CLINTON EXPLORATORY COMMITTEE

By

*Sunrise Enterprises of Columbia, Inc.*

CONTRACTOR

Su.

4827H

93040960241

SUNRISE
Enterprise of Columbia, Inc.

P.O. Box 3076
1215 Anthony Avenue
Columbia, South Carolina 29230
(803) 771-0325

Public Relations ☐ Marketing ☐ Consulting

Invoice No. BC001

Date March 9, 1992

FEID #57-0835405

[To:]
Mr. Doug Heyl
Clinton For President
P.O. Box 615
Little Rock, Arkansas 72203
[]

PAID
3-20-92

QUANTITY	DESCRIPTION	UNIT PRICE		TOTAL	
	Expenses incurred as a result of the Bill Clinton For President Campaign.	\$1572	49		
	TOTAL AMOUNT DUE AND PAYABLE				\$1,572.49 =====
	PLEASE SEE ATTACHMENTS				

93040960242

BILL CLINTON FOR PRESIDENT
EXPENDITURE ACCOUNT

QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL
1	SIGN FOR HDQTRS.	\$ 350.00	\$ 350.00
1	CAR RENTAL	24.10	24.10
550	STAMPS @ .29	159.50	159.50
405	FACSIMILES @ .75	303.75	303.75
2	FLYERS	42.00	42.00
2	SHPMTS. OF CAMP. LIT.	25.05	25.05
2	LONG DISTANCE TEL.	250.09	250.09
	OVERNIGHT PKGS.	31.00	31.00
	ENTERTAINMENT	50.18	50.18
	TRAVEL	176.39	176.39
	TELEGRAM	40.95	40.95
412	POSTAGE @ .29	119.48	119.48
	TOTAL EXPENSES		----- \$1572.49 =====

93040960243

PLEASE SEE ATTACHMENT FOR EXPLANATION.

/BILLCLIN.INV

Robert Williams
104 Mc Neely Rd
Columbia, SC 29223

April 13, 1992

Bishop A. C. Jackson
Bibleway Church
PO Box 90401
Columbia, SC 29290

Dear Bishop Jackson:

Re: Matters Pertaining To Letter To Bishop
Campbell, Etc. Dated April 9, 1992

I would appreciate very much if you
or any of your Executive Trustees or
Trustees contact me by telephone as
expressed in my most recent letter.
The only person that I have any confidence
and trust in currently on your staff
is Deacon Myrl Hayward. I
will only speak to him and him
only by telephone. If necessary, I'll
get a restraining order to prevent anyone
other than Deacon Hayward from calling
me until I am prepared to receive calls.
Sincerely, Robert Williams

Robert Williams
104 Mc Neely Rd
Columbia, SC 29223



Bishop A. C. Jackson
Billeray, Church
P.O. Box 90401
Columbia, SC 29290

Robert L. Williams
104 McNeely Rd
Columbia, SC 29223
April 20, 1992

Bishop A. C. Jackson,
The Executive Trustees,
Trustees & Bibleway Church Family
2440 Atlas Road
PO Box 90401
Columbia, SC 29290

Dear Bishop Jackson and Trustees/
memberships:

With the exception of maybe two of
your Executive Trustees, none
of you when you were made aware
of our suffering attempted to help
us, and in fact tried to dissuade
us from doing that which was just
with respect to matters surrounding
our Federal Lawsuit and US Justice
Department investigation. All of you,
especially you and Darrell Jackson,
breached your Biblical contract with
us by your actions and most
importantly, your lack of action regard-
ing our situation. Your son, Darrell is
one of the most dishonest and slick

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persons I have ever met and I have
all kinds of incredible evidence to prove
so. you unfortunately, as well as others
outside of your Church, have allowed
yourselves to become involved in
Danell's Godless schemes.

93040960247
Because you and especially Danell have
fully known of our plight since
1989, along with nearly all of the others
mentioned above and have willfully done
nothing and in essence have broken
your Biblical contract with us, we
demand all of the money back that
we have contributed to the Bibleway
Church of Atlas Road since 1989 to
1992, under this Biblical contract, immediately.
We will not compromise and will do
everything within the scope of the law
to ensure that justice is rendered.

The conditions of my previous correspondence
are still effective.

Sincerely,

Robert Williams

PS I look ^{forward} to hearing from you and your Trustees
by 4/27/92, in writing. If I don't hear from you
by that date I will write them.

93040960248
Darell especially and you can be assured
that a lawsuit will follow shortly if
Nothing is done. I blame you and your
Executive Trustees and Trustees for putting
Darell in a position in your church
where he is now destroying the church
with his vile ways. I had been trying
to warn you all for years and you rejected
me. I tried to resolve this matter
among brethren, but you all treated me
less than a brother because of political,
financial and other reasons and now,
therefore, must go before secular men
of law for resolution.

If you and others are emotionally hurt by
what is occurring now, I would respectfully
ask that Darell and you consider the
hurt that you have caused us by multiplying
your hurt 40 times; you now have our
level of hurt. I am holding you, your
Executive Trustees and Trustees and especially
your son, Darell Jackson personally for
allowing a dishonest atmosphere to exist
where we were driven and expelled from
your church a second time. You and
Darell had better be very careful for
there have been a number of leaders from
the AME Church and Baptist organization
who have personally come to me to try and
talk to you and Darell about interfering with

their Church policies. Some have suggested to me that Darrell, with your support, have attempted to use their Church as a means of improperly placing Darrell in a position where he would have an advantage over others seeking political offices. Some have questioned ethical violations and possible Federal & State violations with respect to the Coalition of Black Church Leaders, Project ADAM and your Corporation, Sunrise. Representatives from the A.M.E. Church have made it clear that you nor Darrell should attend their convention to attempt to get their by-laws amended to keep Bishop James in South Carolina for Darrell's and others benefit. You can count on this one thing: I will not let you or Darrell bring disgrace to the "Church of God In Christ" organization. I don't take anything at face value and I have certainly evaluated and researched the various complaints made to me and have found them to be for the most part. I would suggest that you & Darrell completely resolve matters with Sisterwell Middleton of "For the People"; there is a great deal of concern among Blacks with what you all and Sunrise attempted to do on behalf of some others and the whole situation may resurface publicly between now and November; if you don't know the details, ask your son.

Darrell, and consequently you and your Trustees have allowed this Church to be sold to the "Highest Bidder," and your actions are identical to the political-religious atmosphere that is to exist in these End Times.

93040960250
You and Darrell need to understand that I have relatives who are respected leaders in the FIME, the Baptist and the Church of God in Christ Churches... Darrell and you need to be very careful with whom you discuss certain matters with.

When you, Bishop, were nothing in the eyesight of secular men, you were great in the eyesight of God. Now you have become somewhat great in the eyesight of secular men and have less greatness in the eyesight of God. All of this happened when you and your trustees allowed and put Darrell a Novice, in a position to redirect this Church from faith to political expediency.

Please understand that my position with respect to Darrell and his unlawful political pursuits have intensified because of various documents that keep turning up. You and your political friends should know by now that I am on a mission for God and that I will do whatever I said I would do.

Darrell, by his arrogance, just as Pharaoh of Egypt, spoke the very words which has resulted in all of what is happening today... You should remember Eli & his sons.

Please understand that the only person on your Executive Trustee and Trustee Boards ^{that I will speak to} by telephone at this time is Deacon Merv Heyward. You, Darrell & others will not escape your Bill

Robert Williams
104 Mc Neely Road
Columbia, SC 29223

Bishop H. C. Jackson
The Executive & General Trustees
of the Episcopal Church Family
Episcopal Church of All Saints Road
P.O. Box 90401
Columbia, SC 29290



93040960251



RECEIVED
FEDERAL
COMMISSION
MAIL ROOM

JUN 25 10 50 AM '92

106 Doctors Circle, Suite C
P.O. Box 3427
Columbia, S.C. 29230
803-929-1130
Fax 803-929-1132

June 22, 1992

Ms. Lisa E. Klein
Assistant General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 3534
Complaining Party: Robert Williams
Respondent: Heyward Bannister

Dear Ms. Klein:

This letter and accompanying documents represent my response to your letter dated June 5, 1992, concerning the above complaint. Also, please be advised that I did not receive your letter and accompanying information until June 19, 1992. I believe the delay resulted from my recent change in address. For verification of my claim, see enclosed copy of notification date indicated by the U.S. Post Office for change of address.

Currently, I am owner and operator of BANCO/Bannister Company, a public relations and consulting firm. My business address is 106 Doctors Circle, Suite C, P. O. Box 3427, Columbia, SC 29230. The telephone number is (803) 929-1130.

From December 4, 1986, until May 15, 1992, I was co-founder of and served as Vice-President and President of Sunrise Enterprise of Columbia, Inc. During this time period, Sunrise provided janitorial, public relations and political consulting services to individuals, organizations and businesses. I also believe a review of Sunrise's track record would reflect that we always conducted business in a professional and ethical manner.

Rev. Darrell Jackson and Bishop A. C. Jackson were business partners of mine while I was with Sunrise. I have always known them to be decent and honorable men. They are highly respected and have given much of their time and service to this community.

Regarding Mr. Williams's complaint, I believe there is absolutely no basis to his allegations. Mr. Williams's allegations appear to stem from a personal vendetta against Bishop A. C. Jackson, and his son, Rev. Darrell Jackson. I surmise that I am implicated in Mr. Williams's allegations due to my previous ownership and involvement with Sunrise.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUN 26 AM 10:17

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Ms. Lisa E. Klein
June 22, 1992
Page 2.

I am enclosing an affidavit from Rev. Darrell Jackson outlining his response to Mr. Williams's complaint as well as documents depicting Sunrise's involvement with the Bill Clinton for President Campaign. I hope this information will be helpful to you.

Again, I deny any notion that I have participated in the "buying of votes" for Governor Bill Clinton or any other candidate and that there is absolutely no basis or foundation for Mr. Williams's allegations. If further information is needed, please call me at (803) 929-1130.

Sincerely,


Heyward Bannister

HB:mwj

enc.

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FEDERAL ELECTION COMMISSION

999 E STREET, NW
WASHINGTON, DC 20463

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE, \$300

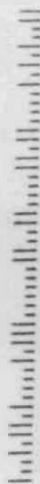
3 0 4 0 9 6 0 2 5 4

POSTAGE
FEDERAL ELECTION COMMISSION

*C/O Sunrise Enterprise
1015 Anthony*

Sunrise Enterprise of
Columbia, Inc.
1111 Belview Street
Suite 103
Columbia, SC 29204

SUNR215 292013493 1592 06/17/92
NOTIFY SENDER OF NEW ADDRESS
: SUNRISE ENTERPRISE
801 GERVAIS ST #102
COLUMBIA SC 29201-3162



STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUN 26 AM 10:17

MUR 3534

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: Heyward Bannister

ADDRESS: 1120 Oconee Street

Columbia, SC 29201

HOME PHONE: (803) 779-3316

BUSINESS PHONE: (803) 929-1130

552060403

92 JUN 26 AM 10:17

STATE OF SOUTH CAROLINA)
COUNTY OF RICHLAND)

AFFIDAVIT

PERSONALLY appeared before Darrell Jackson
first being duly sworn, deposes and states:

1. That he is the assistant pastor of the Bible
Way Church of Atlas Road in Columbia, South Carolina.

2. That the church is part of the National
Holiness Apostolic Ministry.

3. That the undersigned has been an assistant
pastor this church for many years and that such church is
supervised by a trustee board who act upon and oversee the
activities of the church.

4. That the undersigned is personally familiar
with Robert Williams who at one time was a member of this
church but who has never served on the trustee board or in
any significant leadership role in the church itself.

5. That the undersigned and his father Bishop A.C.
Jackson are presently the sole stockholders of Sunrise
Enterprise of Columbia, Inc., a South Carolina corporation
which was chartered on December 4, 1986. Such corporation
has nothing whatsoever to do with Bible Way Church of Atlas
Road or any other religious organization. As the charter,
filed as an exhibit with Mr. Williams' complaint, indicates,
the purposes of the corporation were to be involved in
various businesses and activities including the janitorial

business and for consulting. The corporation has not been involved in the janitorial business over the last several years and has been primarily in the business of consulting and for public relations work, including on occasion the handling of political candidates and campaigns seeking elective office.

6. Heyward Bannister was formerly a stockholder of Sunrise but, as indicated in Williams' complaint, transferred his stock and formed his own company earlier this year. However, his decision had nothing whatsoever to do with the Bill Clinton campaign nor with Bible Way Church.

7. That the Clinton Campaign did in fact sign an agreement with Sunrise to pay Sunrise stipulated funds for professional and consulting services in December 1991. A copy of the agreement is attached hereto as Exhibit A.

8. That the Clinton Campaign paid Sunrise \$3,000 upon the signing of the agreement and has paid installments of \$1,500⁰¹ monthly for four months from February of 1992 to May of 1992. That all funds paid by the Clinton Campaign were disbursed by Sunrise in accordance with detailed invoices as represented by Exhibit B which is the invoice dated March 9, 1992. Other invoices and records are available for inspection including bank records of deposits and checks. No checks nor funds of any kind from the Clinton Campaign were ever paid to Bible Way Church or to any other

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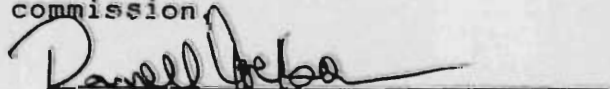
church or religious organization for any purpose and certainly no funds were paid to any persons or organizations for the purpose of directly buying votes or otherwise contravening the provisions of the Federal Election Campaign Act of 1971. Deponent is a member of the Richland County School District 1 Board of Trustees and is presently a candidate for the state senate. Both the undersigned and his father know and recognize the provisions of the Federal Election Act and have always conducted themselves and continue to conduct themselves in a professional and dignified manner in keeping with both the letter and the spirit of such law.

9. That for reasons unknown to the undersigned, Robert Williams has become bitter and disenchanted with not only Bible Way Church but with most of the public officials and public institutions of government in South Carolina. He has attached as a part of his complaint a lawsuit which he brought in 1990 against numbers of public officials (but not against either the deponent or his father, significantly) where he charged a plethora of civil rights and other violations. His case was dismissed by the United States Magistrate Judge and the dismissal was affirmed by United States District Judge Matthew J. Perry and the Fourth Circuit Court of Appeals. He started in on us in earnest after this case was dismissed and I attach two letters as Exhibit C that

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he did not send to you dated April 13, 1992 and April 20, 1992. These letters reflect Mr. Williams' irrational hatred toward the undersigned and Bishop A.C. Jackson. The undersigned has no explanation as to why Mr. Williams feels as he does toward deponent and the host of others reflected by his numerous charges and complaints over the last three years.

10. The undersigned categorically denies any suggestion that he has participated in the "buying of votes" for either Governor Clinton or anyone else and that there simply is no basis or foundation for such a charge. The undersigned further will be happy to have the commission or its representative inspect its financial records or bank accounts but denies that the complainant has produced any evidence in this matter which would justify any type of further investigation by the commission.


DARRELL JACKSON

SWORN to before me this

_____ day of June, 1992

Notary Public for South Carolina
My Commission Expires: _____

AGREEMENT

AGREEMENT made this 15 day of December, 1991,
between the Clinton Exploratory Committee ("Committee")
and Surprise Enterprise of Columbia, Inc. ("Contractor").

1. Committee contracts with Contractor to provide independent consulting services in connection with Governor Clinton's presidential exploratory efforts upon the terms and conditions hereinafter set forth.

2. Contractor shall have access to the Committee's offices, equipment and files; but it is expressly understood that all information and conversations are proprietary to the Committee and shall not be disclosed or turned over to anyone else.

3. Committee shall pay to Contractor and Contractor agrees to accept as compensation for Contractor's services the sum of \$ 3,000 per month. Contractor agrees to comply with all applicable laws and regulations and assumes and agrees to pay all contributions, taxes and assessments incident to income taxes, Social Security, unemployment compensation or similar laws. Contractor agrees to indemnify and hold the Committee harmless from any and all liability, claims or causes of action as a result of Contractor's failure to pay.

4. This Agreement is not assignable or transferable and may be terminated by either party by verbal notification.

5. Contractor is engaged only for the purposes and to the extent set forth in this Agreement, and Contractor's

relationship to Committee shall be that of an independent contractor. When not performing services pursuant to this Agreement, Contractor shall be free to devote Contractor's time and attention to such activities as Contractor chooses.

CLINTON EXPLORATORY COMMITTEE

BY Jaylax*Senora Enterprise of Columbia, Inc.**X. Hays and Bannister*
CONTRACTOR*Su.*

4827H

193040960261

SUNRISE
Enterprise of Columbia, Inc.

P.O. Box 3076
1215 Anthony Avenue
Columbia, South Carolina 29230
(803) 771-0325

Public Relations ☐ Marketing ☐ Consulting

Invoice No. BC001

Date March 9, 1992

FEID #57-0835405

[To:]
Mr. Doug Heyl
Clinton For President
P.O. Box 615
Little Rock, Arkansas 72203
[]

PAID
3-20-92

QUANTITY	DESCRIPTION	UNIT PRICE		TOTAL	
	Expenses incurred as a result of the Bill Clinton For President Campaign.	\$1572	49		
	TOTAL AMOUNT DUE AND PAYABLE				\$1,572.49 =====
	PLEASE SEE ATTACHMENTS				

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BILL CLINTON FOR PRESIDENT
EXPENDITURE ACCOUNT

QUANTITY	DESCRIPTION	UNIT PRICE	TOTAL
1	SIGN FOR HDQTRS.	\$ 350.00	\$ 350.00
1	CAR RENTAL	24.10	24.10
550	STAMPS @ .29	159.50	159.50
405	FACSIMILES @ .75	303.75	303.75
2	FLYERS	42.00	42.00
2	SHPMTS. OF CAMP. LIT.	25.05	25.05
2	LONG DISTANCE TEL.	250.09	250.09
	OVERNIGHT PKGS.	31.00	31.00
	ENTERTAINMENT	50.18	50.18
	TRAVEL	176.39	176.39
	TELEGRAM	40.95	40.95
412	POSTAGE @ .29	119.48	119.48
	TOTAL EXPENSES		----- \$1572.49 =====

PLEASE SEE ATTACHMENT FOR EXPLANATION.

/BILLCLIN.INV

93040960263

Robert Williams
104 W. Neely Rd
Columbia, SC 29223

April 13, 1992

Bishop A. C. Jackson
Bibleway Church
PO Box 90401
Columbia, SC 29290

Dear Bishop Jackson:

Re: Matters Pertaining to Letter to Bishop
Campbell, Etc. Dated April 9, 1992

I would appreciate very much if you
or any of your Executive Trustees or
Trustees contact me by telephone as
expressed in my most recent letter.
The only person that I have any confidence
and trust in currently on your staff
is Deacon Myrl Heyward. I
will only speak to him and him
only by telephone. If necessary, I'll
get a restraining order to prevent anyone
other than Deacon Heyward from calling
me until I am prepared to receive calls.
Sincerely, Robert Williams

Robert Williams
104 Mc Neely Rd
Columbia, SC 29223



Bishop A. C. Jackson
Bibleway Church
P.O. Box 90401
Columbia, SC 29290

59209604036

Robert A. Williams
104 McNeely Rd
Columbia, SC 29223
April 20, 1992

Bishop A. C. Jackson,
The Executive Trustees,
Trustees & Bibleway Church Family
2440 Atlas Road
PO Box 90401
Columbia, SC 29290

Dear Bishop Jackson and Trustees/
memberships:

With the exception of maybe two of
your Executive Trustees/Trustees, none
of you when you were made aware
of our suffering attempted to help
us, and in fact tried to dissuade
us from doing that which was just
with respect to matters surrounding
our Federal Lawsuit and US Justice
Department investigation. All of you,
especially you and Darrell Jackson,
breached your Biblical contract with
us by your actions and most
importantly, your lack of action regard-
ing our situation. Your son, Darrell is
one of the most dishonest and slick

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Persons I have ever met and I have
all kinds of incredible evidence to prove
so. you unfortunately, as well as others
outside of your Church, have allowed
yourselves to become involved in
Danell's Godless schemes.

Because you and especially Danell have
fully known of our plight since
1989, along with nearly all of the others
mentioned above and have willfully done
nothing and in essence have broken
your Biblical contract with us, we
demand all of the money back that
we have contributed to the Bibleway
Church of Atlas Road since 1989 to
1992, under this Biblical contract, immediately.
We will not compromise and will do
everything within the scope of the law
to ensure that justice is rendered.

The conditions of my previous correspondence
are still effective.

Sincerely,

Robert Williams

PS I look ^{forward} to hearing from you and your Trustees
by 4/27/92, in writing. If I don't hear from you
by then I will have to write the ...

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Danell especially and you can be assured
that a lawsuit will follow shortly if
Nothing is done. I blame you and your
Executive Trustees and Trustees for putting
Danell in a position in your church
where he is now sabotaging the church
with his vile ways. I had been trying
to warn you all for years and you rejected
me. I tried to resolve this matter
among brethren, but you all treated me
less than a brother because of political,
financial and other reasons and now,
therefore, must go before secular men
of law for resolution.

If you and others are emotionally hurt by
what is occurring now, I would respectfully
ask that Danell and you consider the
hurt that you have caused us by multiplying
your hurt 40 times; you now have our
level of hurt. I am holding you, your
Executive Trustees and Trustees and especially
your son, Danell Jackson personally for
allowing a dishonest atmosphere to exist
whereby we were driven and expelled from
your church a second time. You and
Danell had better be very careful for
there have been a number of leaders from
the AME Church and Baptist organization
who have personally come to me to try and
talk to you and Danell about interfering with

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their Church policies. Some have suggested to me that Darrell, with your support, have attempted to use their Church as a means of improperly placing Darrell in a position where he would have an advantage over others seeking political offices. Some have questioned ethical violations and possible Federal & State violations with respect to the Coalition of Black Church Leaders, Popist ADAM and your Corporation, Sunrise. Representatives from the A.M.E. Church have made it clear that you nor Darrell should attend their convention to attempt to get their by-laws amended to keep Bishop James in South Carolina for Darrell's and others benefit. You can count on this one thing: I will not let you or Darrell bring disgrace to the "Church of God in Christ" organization. I don't take anything at face value and I have certainly evaluated and researched the various complaints made to me and have found them to be for the most part. I would suggest that you & Darrell completely resolve matters with Luterell Middleton of "For the People"; there is a great deal of concern among Blacks with what you all and Sunrise attempted to do on behalf of some others and this whole situation may resurface publicly between now and November; if you don't know the details, ask your son.

Darrell, and consequently you and your Trustees have allowed this Church to be sold to the "Highest Bidder," and your actions are identical to the political religious atmosphere that is to exist in these End Time

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You and Darrell need to understand that I have relatives who are respected leaders in the AME, the Baptist and the Church of God in Christ Churches... Darrell and you need to be very careful with whom you discuss certain matters with.

When you, Bishop, were nothing in the eyesight of secular men, you were great in the eyesight of God. Now you have become somewhat great in the eyesight of secular men and have less greatness in the eyesight of God. All of this happened when you and your trustees allowed and put Darrell a Novice, in a position to redirect this Church from faith to political expediency.

Please understand that my position with respect to Darrell and his unlawful political pursuits have intensified because of various documents that keep turning up. You and your political friends should know by now that I am on a mission for God and that I will do whatever I said I would do.

Darrell, by his arrogance, just as Pharaoh of Egypt, spoke the very words which has resulted in all of what is happening today... You should remember Eli & his sons.

Please understand that the only person on your Executive Trustee and Trustee Boards by telephone at this time is Deacon Mervyn Heyward. You, Darrell & others will not escape your Bill

Robert Williams
104 Mc Nelly Road
Columbia, S.C. 29223

Bishop H. C. Jackson
The Executive, General Trustees
& The Wilburys Church Family
Wilburys Church of Hills Road
P.O. Box 90401
Columbia, S.C. 29290



1 2 3 4 5 6 7 8 9 0

Bill Clinton
FOR PRESIDENT COMMITTEE

OGC 5027

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF CLINTON FOR PRESIDENT

92 JUL -2 PM 3:23

July 2, 1992

Hand Deliver

Ms. Veronica M. Gillespie
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3534

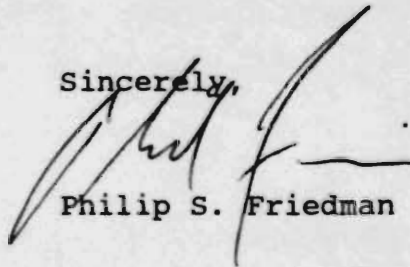
Dear Ms. Gillespie:

Enclosed please find the original and three (3) copies of the Response of the Clinton for President Committee to the complaint filed against it in the above referenced action.

Please be advised that a general Statement of Designation of Counsel for Robert A. Farmer, Treasurer, Governor Bill Clinton, and the Clinton for President Committee, Inc. has been filed with the Commission under separate cover in which Anthony S. Harrington, Christine Varney and the undersigned are designated as counsel (copy enclosed).

If you have any questions or concerns, please give me a call.

Sincerely,



Philip S. Friedman

cc: Tony Harrington
Christine Varney

Enclosure

STATEMENT OF DESIGNATION OF COUNSEL

MUR: Designation of Counsel for all matters before the Federal Election Commission

NAME OF COUNSEL: Mr. Anthony S. Harrington
General Counsel: Clinton for President

Ms. Christine Varney
Chief Counsel: Clinton for President

Hogan and Hartson
Columbia Square
555 Thirteenth Street, N.W.
Washington, D.C. 20004
(202) 637-5600

Mr. Philip S. Friedman
Deputy General Counsel: Clinton for President

Ross & Hardies
888 16th Street, N.W.
Washington, D.C. 20006
(202) 296-8600

The above named individuals are hereby designated as my counsel as Treasurer of the Clinton for President Committee Inc. and as counsel for the Clinton for President Committee, Inc. and are authorized to receive any notifications and other communications from the Commission and to act on my behalf and on behalf of the Clinton for President Committee Inc. before the Commission.

6/24/92
Date


Robert A. Farmer, Treasurer
Clinton for President
Committee, Inc.

RESPONDENTS' NAMES: Robert A. Farmer, Treasurer
Clinton for President Committee,
Inc.

Clinton for President Committee, Inc.

ADDRESS: P.O. Box 615
Little Rock, Arkansas 72203

PHONE: (501) 372-1992

All correspondence should be directed to the committee's General Counsel, Mr. Anthony S. Harrington, at the address listed above.

23040960273

UNITED STATES OF AMERICA
BEFORE THE FEDERAL ELECTION COMMISSION

IN THE MATTER OF THE CLINTON FOR
PRESIDENT COMMITTEE, INC. AND
ROBERT A. FARMER, TREASURER

MUR 3534

RESPONSE OF THE CLINTON FOR PRESIDENT
COMMITTEE, INC. AND ROBERT A. FARMER, TREASURER

On June 1, 1992, Robert Lee Williams filed a complaint with the Federal Election Commission alleging violations of the Federal Election Campaign Act of 1971, as amended (the "Act") by the Clinton for President Committee. This memorandum sets forth the factual and legal reasons upon which the Commission should find no reason to believe a violation of the Act has occurred.

As a preliminary matter, the complaint does not meet the Commission's minimum pleading standards which require a complaint to "contain a clear and concise recitation of the facts which describe a violation of a statute or regulations over which the Commission has jurisdiction." 11 CFR 111.4(d)(3). The handwritten complaint, incorporating by reference numerous submissions to various state and federal agencies, casts a wide net of unsupported claims with the apparent hope that at least one allegation before at least one governmental agency will give rise to at least one investigation. Although impressive in the volume of paper submitted, the complaint fails to state a single allegation or present a scintilla of evidence that pleads a violation of the Act. Accordingly, the Commission should take no action on the complaint. See 11 CFR 111.5

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Stripped of its conclusory statements and allegations over which the Commission has no jurisdiction, the complaint contends that the Clinton for President Committee paid Darrell Jackson, A.C. Jackson and Heyward Bannister, through their company Sunrise Enterprise of Columbia, Inc., to organize and manage constituency groups on behalf of the Clinton presidential campaign in South Carolina. While the Clinton Committee did pay Sunrise Enterprise fees and expenses in connection with Governor Clinton's presidential efforts in South Carolina, as the attached consulting agreement indicates, that fact does not constitute a violation of the Act.¹

The complaint additionally contends that Clinton campaign literature produced on behalf of the Clinton Campaign by Sunrise Enterprise was distributed in the lobby of a church. The distribution of campaign literature to church members, by church members, following a church service, also does not state any cognizable violation of the Act by the Clinton for President Committee.

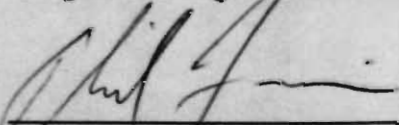
The Commission has long recognized that in determining whether an investigation is justified it must make an "evaluation of the credibility of the allegation, the nature of the threat posed by the offense, the resources available to the agency and numerous other factors," In re Federal Election Campaign Act Litigation, 474 F. Supp. 1044, 1045-46 (D.D.C. 1979). In this

¹The Campaign paid Sunrise \$3,000 upon the signing of the Consulting Agreement and an additional \$6,000 in four equal monthly installments.

instance, the complainant has failed to allege a single fact that can even remotely be construed as a violation of the Act. A complaint which contends the actors involved must have "violated some law, even if was [sic] only the By-laws of the Church," is not the sort of unsubstantiated claims upon which this agency should waste its resources or the resources of the respondents.

On the basis of the foregoing, the Commission should find no reason to believe that a violation of the Act has occurred or is likely to occur.

Respectfully submitted



Anthony S. Harrington
Christine Varney
Philip Friedman

Counsel for Clinton for President
Committee, Inc. and Robert A.
Farmer, treasurer

93040960276

J13722292

CLINTON FOR PRES.

F-220 T-333 02/003 DEC 27 '91 14:19

AGREEMENT

AGREEMENT made this 15 day of December, 1991,
between the Clinton Exploratory Committee ("Committee")
and Surprise Enterprise of Columbia, Inc. ("Contractor").

1. Committee contracts with Contractor to provide independent consulting services in connection with Governor Clinton's presidential exploratory efforts upon the terms and conditions hereinafter set forth.
2. Contractor shall have access to the Committee's offices, equipment and files; but it is expressly understood that all information and conversations are proprietary to the Committee and shall not be disclosed or turned over to anyone else.
3. Committee shall pay to Contractor and Contractor agrees to accept as compensation for Contractor's services the sum of \$ 3,000 per month. Contractor agrees to comply with all applicable laws and regulations and assumes and agrees to pay all contributions, taxes and assessments incident to income taxes, Social Security, unemployment compensation or similar laws. Contractor agrees to indemnify and hold the Committee harmless from any and all liability, claims or causes of action as a result of Contractor's failure to pay.
4. This Agreement is not assignable or transferable and may be terminated by either party by verbal notification.
5. Contractor is engaged only for the purposes and to the extent set forth in this Agreement, and Contractor's

3040960277

+5813722292

CLINTON PRES.

F-228 T-3 P-003/003 DEC 27 '91 14:19

relationship to Committee shall be that of an independent contractor. When not performing services pursuant to this Agreement, Contractor shall be free to devote Contractor's time and attention to such activities as Contractor chooses.

CLINTON EXPLORATORY COMMITTEE

BY

*[Signature]**Sunrise Exploration & Consulting, Inc.**X Hays and Bannister*

CONTRACTOR

Su.

4827H

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RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

JUL 13 11 15 AM '92

Robert A. Williams
104 McNeely Rd
Columbia, SC 29223
July 1, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUL 14 AM 11:59

Office of the General Counsel
C/O Ms Lisa E. Klein
Assistant General Counsel
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Dear Ms Klein:

Re: Bill Clinton Campaign Disclosure Information

My file reference number is MUR3534. However,
I am writing regarding this file indirectly.

At the time of the writing of this letter I was
not able to locate the name and address
of the person I was to contact to get
copies of certain information from Mr. Clinton's
file.

If it is not too much of a problem, would you
please have sent to me, as soon as possible,
the following information from Mr. Clinton's
Campaign Disclosure file: (1) his Campaign
Election Committee (2) And Campaign expenses
related especially to Sunrise Enterprise of Columbia,
Inc. I need this information to review because
my local State Ethics Commissioner has determined

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from some similar documents filed with
them that facts contained therein are sufficient
to require an investigation on their part. I will be
able to pay as much as \$200.00 for the
documents. I can pay COD or send a Certified
Check for the documents when received.

Thanks again for passing this document to
the appropriate personnel.

Should there be a question, please call me at
788-5494 or 748-3254.

With Kind Regards,
Robert Williams

93040960280

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

JUL 13 11 15 AM '92

Robert Lee Williams
104 McNeely Rd
Columbia, SC 29223

July 1, 1992

Office of the General Counsel
C/O Ms Lisa E. Klein
Assistant General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUL 14 AM 11:59

Dear Counsel Klein:

Re: **MUR 3534**

First of all, I would like to thank you and
all of the capable persons who are working
on this most difficult matter.

With regards to your letter dated June 5, 1992,
I enclose herewith a copy of a Project
ADAM (Anti Drug Abuse Movement)

Newsletter produced by the South Carolina
Coalition of Black Church Leaders, Inc.

Page 4 of this Newsletter especially, as well
as page 2 and the insert, I believe, provides
additional supporting material for my
Complaint.

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23040960282
If this is not an unreasonable request,
and if such laws do not already exist,
I respectfully request that this honorable
Commission consider recommending
legislation which would greatly limit
the manner in which Church Pastors and/or
Assistant Pastors, and consequently their
Churches act when receiving pay from
a Political Candidate(s) to support their
Candidacy and encourage their memberships
and or organizations to do the same.

I will forward any additional information
that I come upon.

With Warmest Personal Regards,

Sincerely,

Robert Lee Williams

STATE OF SOUTH CAROLINA

COUNTY OF Richland

Personally appeared before me Robert Lee Williams
who, first being duly sworn, says that he/she has read and knows
the contents of the attached complaint and that the allegations
contained therein, are true and correct to the best of
his own knowledge, except for those matters
therein based upon information and belief, and as to those he/she
believes them to be true.

Sworn to and subscribed before me this

1 day of July 19 92

Louis H. Buxton
Notary Public for South Carolina

My Commission Expires 2-14-2000

Robert Lee Williams
COMPLAINANT'S SIGNATURE

93040960283

Project ADAM

Anti
Drug
Abuse
Movement

update

Spring 92

Volume 4 Number 2

"Grassroots Resistance Increasing to Minority Targeted Advertising"

by Pam Bryant

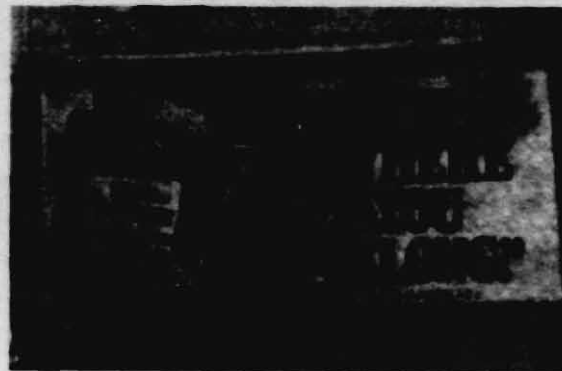
Advertising is all around us. And, perhaps billboards are the most intrusive and offensive of all — fixed in our environment like trees and buildings. They are so much a part of our lives that we tend to ignore the health consequences associated with the product being advertised.

For years many residents, particularly in inner-city communities, have surveyed their surroundings to find giant-sized ads promoting unhealthy lifestyles. Alcoholic beverage and tobacco ads on billboards continually link drinking and smoking with social, economic, athletic and sexual success.

Conveniently, these billboard ads fail to convey the message that annually over 400,000 deaths and serious health problems can be attributed to drinking and smoking. Research has shown that alcohol abuse is the leading health problem among Blacks. Plus, a higher percentage of Blacks than Whites die every year from heart disease and cancer, both

of which are associated with tobacco.

Blacks and other minorities, whose communities are special targets of alcohol and tobacco manu-



Marketing Booze To Blacks, Copyright 1987

facturers, have organized community-based, grassroots efforts to combat slick billboard ad campaigns. Residents of communities nationwide are beginning to see alcohol and tobacco billboards for what they really are — distasteful, dishonest, deceitful and a nuisance to their environment.

Community activism was the underlying theme expressed at a recent conference in Washington, D.C.

Presenter after presenter at the Alcohol Policy VIII Conference gave testimonials of grassroots efforts that work. Rev. Calvin G. Butts, III, pastor of the Abyssinian Baptist Church in New York City, Harlem, is probably best known for the outright war he's waged on alcohol and tobacco billboards.

Butts, who is frequently booked for preaching and lecturing engagements for audiences numbering into the thousands, admitted to conference participants that on the morning of one of his engagements, he found himself totally unprepared. Driving around Harlem to get ideas for a topic, he became infuriated with what he saw.

Glaring out at every turn were alcohol and tobacco billboards featuring Black sex symbols and well-known Black actors, actresses and athletes. His search for a topic that day turned into a heated sermon to

GRASSROOTS RESISTANCE

Continued on Page 3>

Chairman's Message

ENEMIES OF THE DREAM



Bishop F.C. James

The thrust of Project ADAM is youth involvement — youth under the age of seventeen. This is the period of early education, life-style initiation, and career determination.

Our youth become frontliners in drug abuse awareness because youth impress youth most effectively.

While our youth advance the Project ADAM campaign, enemies appear in unexpected places — insidious enemies stand in fields, on roadsides, along sidewalks, and appear on television to divert the attention, appeal to the mind, and influence the habits of our drug-fighting youth.

These enemies are billboards, displays, and commercials which glamorize the deadly and normalize the dangerous in the process of making a sale.

The result of this "salesmanship" is the orientation of impressionable youth into early habits of the drinking of drug-addicting alcohol and the smoking of cancer-inducing tobacco.

To many of our youth, "the slick sell" not only looks "Okay;" but it is presented as "The Way!"

Project ADAM Director Darrell Jackson, the Regional Directors, and the South Carolina Coalition of Black Church Leaders are engaged in a new holistic focus on a program called LIFESTYLES/HEALTHSTYLES which is designed to make a dramatic difference in the health, hope, and happiness of African Americans in South Carolina.



Citizens' Action Handbook on Alcohol and Tobacco Billboard Advertising. Copyright 1990

Project ADAM, by definition, is against a lot; but, in fact, Project ADAM is for much more — The Future of African American Youth!

Bishop F. C. James
Chairman

Executive Director's Message

IT'S TIME TO RECLAIM OUR COMMUNITIES

So much of the time, we fail to think of the legal drugs — alcohol and tobacco, as life threatening products. That's because we have become conditioned to view the use of alcohol and tobacco as a part of everyday life.

Unfortunately, our communities are too unaware of the statistics. Year after year more African-Americans are dying from preventable diseases associated with the misuse of alcohol and tobacco, than any other ethnic group.

We ignore the attempts made by alcohol and tobacco industries to



Darrell Jackson

market certain products specifically to our communities. We fail to see that it's all about dollars and cents, and that the industry could care less about the rising incidence of death among our race.

It's up to us to become educated and to help make our communities aware. What works for some communities may not work for others, but that's no excuse to remain complacent.

There's a lot of work to be done to clean up our communities. For your community, billboard advertisements may not be the problem, but no doubt all of us can think of at least one incidence involving alcohol, tobacco or other drugs that have hit home. It's time to mobilize as a community and do something about the rising number of death and serious illness among Blacks.

Let's take up the banner and reclaim our communities for our children.

Darrell Jackson
Executive Director

Project ADAM Update Extra

Coming Soon!!! Lifestyles/Healthstyles

A Church-Based Health Promotion Project for Black South Carolinians

The South Carolina Coalition of Black Church Leaders, Inc. is proud to be a major sponsor of LIFESTYLES/HEALTHSTYLES to help improve the health status of Black Americans in South Carolina through positive lifestyle changes. In South Carolina, Blacks are not only less healthy than Whites, they are less healthy than other Blacks nationwide.

- South Carolina's Black babies are twice as likely to die before age 1 as White babies.
- In 1988, South Carolina Blacks were about 3.5 times more likely to be murdered than Whites; Black males were 4.4 times more likely to be killed than White males. Black females were twice as likely to be killed than White females.
- Black people account for the majority of the AIDS cases transmitted by intravenous drug use, heterosexual contact and other undetermined means.
- Blacks die younger of heart disease than Whites. And, uncontrolled hypertension is a major reason for Black people dying of heart disease, stroke and kidney disease.

S.C. DHEC has committed to ongoing technical assistance during this project.

Lifestyles/Healthstyles

Find out how your church can take part in creating healthier Black communities in South Carolina!!!

For More Information, Contact:

Rev. Darrell Jackson

S.C. Coalition of Black Church Leaders, Inc.

P.O. Box 3076 • Columbia, SC 29230 • (803) 779-4528

A Joint Effort of the African Methodist Episcopal Church of South Carolina, the S.C. Department of Health and Environmental Control, and the S.C. Coalition of Black Church Leaders, Inc.

Emancipation Celebration Planned in Greenville

Children and adults across South Carolina are invited to take part in a festive event commemorating the proclamation to end slavery.

The celebration, called Juneteenth will be held June 18-21, in Greenville.

Juneteenth is the special name given to Emancipation Day. On that day in Texas, Union General Granger proclaimed the slaves free and

Juneteenth became a state holiday in that state, according to festival organizers.

The Juneteenth Preservation Society, sponsor of Juneteenth, was organized to rekindle an appreciation for Black history. Hattie Hill Cureton, founder and president of the organization, is credited with establishing the Juneteenth celebration in the upstate.

"We want to develop and showcase the Black experience," says Cureton. Our main objective is to address mental, social, and economic needs of Black people in every possible way.

The celebration will feature a full slate of day and evening activities. Children are especially encouraged to participate in the Juneteenth Parade on Saturday, June 20, beginning at 10:00 a.m. It will begin at the Sears Center on Main Street in Greenville, and end at the Sterling Community Park. Children will be treated to breakfast prior to the parade. A free hot dog lunch will be served at the park.

For more information about Juneteenth, contact Hattie Cureton at (803) 271-4612.

(Please see calendar of events.)

Grassroots Resistance

Continued from Page 1

a crowd of over a thousand and a crusade that is helping to wipe out targeted billboard advertising in his Harlem community.

Butts also wages attacks on actors like Billy Dee Williams and rap groups that promote alcoholic beverages. He describes Billy Dee as a disgrace to the African-American community, and particularly to Black women as Billy Dee proclaims that Colt 45 malt liquor "... works every time" in the ads.

As loud and clear as the message is for some, others of us are blind to the repulsive messages being sent by the alcohol and tobacco industries. Perhaps Butts said it best when he stated that because our communities remain uneducated "we are, allowing the advertisers to get away with murder."

Butts' crusade to rid his community of alcohol and tobacco billboards goes on. He has appeared at conferences and programs nationwide, telling about his own grassroots attempts to clean up his community. His story is one that challenges others to get actively involved in educating their communities about the negative impact of advertising, and to be fearless of the consequences if it means saving lives.

JUNETEENTH CELEBRATION Calendar of Events

Thursday June 18, 1992

- 4:00 pm Welcome Reception - Hilton Hotel
- 6:00 pm Peg Leg Bates Reception
- 8:00 pm Peg Leg Bates Dinner Black Tie - Palmetto Exposition Center

Friday June 19, 1992

- 7:00 am Television Taping - to be announced
- 9:00 am Sports Tournament - to be announced
- 11:30 am Business Luncheon Palmetto Exposition Center
- 6:00 pm Block Party - Sterling Community Park/Center Free Food and Drink
- 8:00 pm Knights of the Round Table Dinner - Palmetto Exposition Center Dr. Augustus Rodgers, Keynote Speaker

Saturday June 20, 1992

- 7:00 Boy Scout/Children Breakfast - Sears Center, Main Street

- 10:00 am Parade-Main Street to Sterling Community Park (Hot Dog Lunch after Parade)
- 3:00 pm Fun and Games, etc. - Sterling Community Park
- 6:00 pm King's Smith State Dinner - Hilton Hotel
- 7:00 pm Truck Stop Shirley - Hilton Hotel
- 8:00 pm Dance Under the Stars - Old Timer's Dance Song's From the 50's - Sterling Community Park

Sunday June 21, 1992

- 8:00 am Minister's Breakfast - Peace Center
- 11:00 am Church - Springfield Baptist Church on McBee Avenue
- 1:00 pm President's Luncheon (Hattie's Choice) - Walling Drums
- 7:00 pm Crowning of Queen/Awards Night-Peace Center

Juneteenth Preservation Society
(803) 271-4612
for questions

Education + Hard Work - Drugs = Success and THE AMERICAN DREAM

by Waltene Vaughn

The message is a very simple one, and the speaker says it works... You just gotta' believe, according to Drew Brown, a pilot for Federal Express Corp. and the Naval Reserve.

Brown, who's also president and founder of the American Dream Foundation, uses the organization to spread his message for survival to school and community groups throughout the country.

On a recent speaking engagement in Columbia, the towering sixfooter asked his young audience to remember this formula: "Education plus Hard Work minus Drugs equals Success and The American Dream."

What does his formula really mean? Brown offers these helpful pointers:

Education — Many of this country's leaders, such as General

Win Powell, entertainer and television star Bill Cosby, and former Supreme Court Justice Thurgood Marshall have something in common. That's an education!

Remember that education is the only way to guarantee your success. If you don't go to college, you're not going to make it.

Don't ever say you can't afford to go to college, because the truth is, you can't afford not to go to college. If you don't have the money, then work hard in school now, and earn a scholarship. Or, work part time to pay for it yourself, or join a college ROTC program. Remember, you do have options.

Hard Work — Think big and go for it. Remember doctors and lawyers weren't born doctors and lawyers. They were kids once, went to school, studied hard, and learned to be professionals. If you believe you can be a pilot, a nurse, an architect, or whatever you want, you will. If you don't believe, you won't.

If you don't know what you want to do, still go on to college.

Use Drugs — Drugs kill. It's as simple as that. First your brain, then your spirit, and finally your body. Drugs and alcohol suck the power from your very soul.

Success — Brown believes there is no black and white, rather only ignorance and intelligence. For some who choose to use their color, sex, religion or socioeconomic background as an excuse for a failure, they are losers. That's because they don't have what it takes to be happy with themselves.

Of course, Brown doesn't deny that racism and sexism exist. But you must remember that prejudice is ignorance, and intelligence beats ignorance.

If you encounter racism and sexism, you'll just have to work twice as hard to reach your goal. But you'll still appreciate the award in the end.

So go to college. Stay away from drugs. And, most of all, believe in yourself.

For information on scheduling Drew Brown to speak in your area, contact Laurie Brown, The American Dream Foundation, P.O. Box 17403, Memphis, Tenn. 38187-0403, or call (901) 757-8777.

Project ADAM Update

S.C. Coalition of
Black Church Leaders, Inc.
P.O. Box 3076
Columbia, S.C. 29230
(803) 779-4528

Chairman

Bishop F.C. James

Vice Chairman

Dr. S. C. Cureton

Vice Chairman

Bishop A.C. Jackson

Executive Director

Darrell Jackson

Consultants

Sunrise Enterprise of
Columbia, Inc.

Editor

Waltene Vaughn

Reporter

Pamela L. Bryant

Design and Layout

Pastel Design Group, Ltd.

S.C. Coalition of
Black Church Leaders, Inc. X
P.O. Box 3076
Columbia, SC 29230

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 16, 1992

Mr. Robert Lee Williams
104 McNeely Road
Columbia, South Carolina 29223

RE: MUR 3534

Dear Mr. Williams:

This letter acknowledges receipt on July 14, 1992, of the supplement to the complaint you filed on June 1, 1992, against Clinton for President Committee and Robert A. Farmer, as treasurer, Darrell Jackson, Andrew C. Jackson, and Sunrise Enterprise of Columbia, Inc. The respondents will be sent copies of the supplement. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

With regard to your request concerning disclosure information for the Bill Clinton for President Committee, please contact the Public Disclosure Division of the Federal Election Commission.

Sincerely,

Veronica M. Gillespie

Veronica M. Gillespie
Attorney

93040960289



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 16, 1992

J. Lewis Cromer, Esq.
Cromer & Mabry
1225 Pickens Street
Columbia, South Carolina 29201

RE: MUR 3534

Dear Mr. Cromer:

On June 15, 1992, your clients, Bishop Andrew C. Jackson and Darrell Jackson were notified that the Federal Election Commission received a complaint from Robert L. Williams alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time Andrew C. Jackson and Darrell Jackson were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On July 14, 1992, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

If you have any questions, please contact me at
(202) 219-3690.

Sincerely,

Veronica M. Gillespie (By XN)

Veronica M. Gillespie
Attorney

Enclosure

23040960290



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUGUST 4, 1993

Bibleway Church of Atlas Road, Inc.
1830 Bluff Road
Columbia, South Carolina 29201

RE: MUR 3534

Dear Sir or Madam:

The Federal Election Commission received a complaint which indicates that the Atlas Road Baptist Church may have violated the Federal Election Campaign Act of 1971, as amended "the Act". A copy of the complaint is enclosed. We have numbered this matter MUR 3534. Please refer to this number in all future correspondence.

The complaint was not sent to you earlier due to administrative oversight. Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the Office of the General Counsel, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

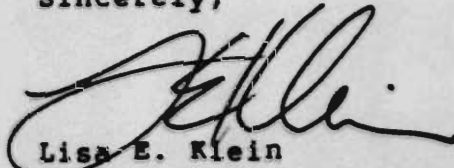
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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Bibleway Church of Atlas Road, Inc.
Page 2

If you have any questions, please contact Craig D. Reffner, the attorney assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Lisa E. Klein
Assistant General Counsel

Enclosures

1. Complaint
2. Procedures
3. Designation of Counsel Statement

CC: Bishop Andrew C. Jackson
Bishop of the Bible Way Church of Atlas Road, Inc.

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AUG 22 9 09 AM '93

CROMER & MABRY

Attorneys and Counselors at Law

1225 PICKENS STREET
COLUMBIA, SOUTH CAROLINA 29201

J. LEWIS CROMER
BENJAMIN M. MABRY
J. L. MANN CROMER, JR. *
CRAIG L. BERMAN

August 13, 1993

MAILING ADDRESS:
P.O. Box 11675
COLUMBIA, SOUTH CAROLINA 29211-1675
TELEPHONE 803-799-9530
FAX 803-799-9533

* Also admitted in
California & District of Columbia

Lisa E. Kline, Esquire
Assistant General Counsel
Federal Election Commission
Washington, D.C. 20463

In Re: MUR-3534 Bibleway Church of Atlas Road, Inc.

Dear Ms. Kline:

The undersigned is in receipt of your letter of August 4 relating to Bibleway Church of Atlas Road, Inc. I have also spoken to Craig D. Reffner by telephone about this matter.

The allegations of Mr. Williams appear to be the same or substantially similar to those which he earlier raised against Bishop Jackson and Senator Jackson and, like his many lawsuits, charges and complaints over the years, have no substance nor validity.

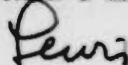
Bibleway Church will rest upon the affidavits earlier furnished by Bishop Jackson and Darryl Jackson as well as the current affidavit attached hereto signed by now Senator Darryl Jackson.

I trust this will be a sufficient response to satisfy the Commission but should any other documents or records be required from the church or, for that matter, from the Jacksons in the earlier charge, do not hesitate to contact us.

I did not receive a designation of counsel statement in the package sent to me on August 4 as the letter indicated, but I will be happy to have my client sign one for your records if you will furnish it to me.

Sincerely,

CROMER & MABRY



J. Lewis Cromer

JLC/iab
Enclosure

93040960293

STATE OF SOUTH CAROLINA)
) AFFIDAVIT
COUNTY OF RICHLAND)

PERSONALLY appeared before me, DARRELL JACKSON, who being duly sworn, deposes and states as follows:

(1) That he is the assistant pastor of BIBLEWAY CHURCH of ATLAS ROAD, INC., and is also a duly elected state senator in the South Carolina Legislature, having been duly elected to a four-year term in 1992.

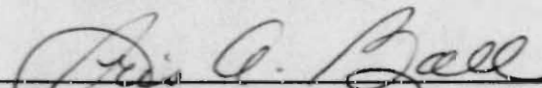
(2) That he has read the charges made by ROBERT LEE WILLIAMS to the Federal Election Commission forwarded to the Church and its counsel, J. Lewis Cromer, on August 6, 1993 and finds the same identical or substantially similar to charges made against the undersigned and his father, BISHOP ANDREW C. JACKSON, the pastor of BIBLEWAY, earlier by WILLIAMS.

(3) That all charges of wrongdoing are false and malicious and have been denied by affiant and his father already in affidavits filed with the Commission and any wrongdoing charged to BIBLEWAY is totally without basis. These affidavits are incorporated by reference herein. Many staff persons and parishioners of BIBLEWAY proudly supported President Clinton in the election of 1992 and some may have supported former President Bush, but BIBLEWAY never officially endorsed or supported any candidate as a congregation. The Church hired no political consultants, raised no political funds nor participated as a congregation in any effort in behalf of a single candidate. The undersigned's support for President Clinton or the election activities of SUNRISE ENTERPRISE OF COLUMBIA, INC. in the Clinton Campaign were totally separate and apart from BIBLEWAY, and affiant and his father have already agreed to make available any financial records sought by the Commission in the event of any question.

(4) To the knowledge of affiant, all lawsuits, complaints or charges brought by WILLIAMS relating to these matters to date (many of which comprise his "complaint" in this matter, have all been concluded and resolved against MR. WILLIAMS without exception. That is the only rational result here in connection with the irrational charges made.


DARRELL JACKSON

SWORN TO before me
this 16th day of August, 1993.


Notary Public for South Carolina
My commission expires 2-26-2000.

93040960294

STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL:

J. Lewis Cromer, Esquire

ADDRESS:

Cromer & Mabry

1225 Pickens Street

Columbia, SC 29201

TELEPHONE:

803 799-9530

93 AUG 30 AM 10:14

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FEDERAL ELECTION COMMISSION

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

8-24-93

Date

Danill Jackson Individually as
Signature

Bibleway Church by Danill Jackson
Bishop A.C. Jackson by Danill Jackson

RESPONDENT'S NAME:

Darrell Jackson, Bishop A. C. Jackson and

Bibleway Church of Atlas Road

ADDRESS:

2440 Atlas Road

Columbia, SC 29209

HOME PHONE:

803 776-6954

BUSINESS PHONE:

803 776-1238

93040960295

RECEIVED
F.E.C.
SECRETARIAT

93 SEP -2 AM 10:01

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

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

MUR 3534
DATE COMPLAINT RECEIVED
BY OGC: June 1, 1992
DATE OF NOTIFICATION TO
RESPONDENTS: June 5, 1992
STAFF MEMBER: Craig D. Reffner

COMPLAINANT: Robert Lee Williams

RESPONDENTS: Clinton for President Committee and
Robert A. Farmer, as treasurer
Andrew Jackson
Darrell Jackson
Heyward Bannister
Sunrise Enterprise of Columbia, Inc.
Bibleway Church of Atlas Road, Inc.

RELEVANT STATUTES: 2 U.S.C. § 441b(a)
11 C.F.R. § 114.3

INTERNAL REPORTS CHECKED: Disclosure reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was initiated by a complaint from Robert Lee Williams alleging violations of the Federal Election Campaign Act of 1971, as amended (the "Act"), by the Clinton for President Committee and Robert A. Farmer, as treasurer (collectively referred to as the "Committee"), the Bibleway Church of Atlas Road, Inc. (the "Church"), Sunrise Enterprise of Columbia, Inc. ("Sunrise"), Andrew Jackson, Darrell Jackson, and Heyward Bannister. Responses have been received. Attachments A-D.

II. FACTUAL AND LEGAL ANALYSIS

In his lengthy and rather disjointed complaint,

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Mr. Williams cites to no specific statutory provision which Respondents allegedly violated.¹ He nonetheless maintains that "there is sufficient evidence for . . . the Federal Elections [sic] Commission . . . to commence investigations [sic] for possible violations of state and federal laws." Complaint at 21 (letter to Hon. Gary R. Baker, Exec. Dir., State Ethics Comm'n.). Mr. Williams' call for an investigation is apparently based on two decipherable allegations buried deep within his complaint. First, that Respondents engaged in a "vote-buying" scheme. Second, that Respondents distributed partisan campaign literature at the Church.

A. Vote Buying Scheme

According to Mr. Williams, the Committee disbursed funds to Sunrise, a company allegedly owned by Andrew Jackson, his son, Darrell Jackson, and Heyward Bannister, for the purpose of buying votes in South Carolina. Complainant alleges that Respondents did this under the guise that Sunrise would organize and manage constituency groups in that state. There is, however, no credible evidence supporting this allegation.

1. Mr. Williams' voluminous and rambling complaint consists mostly of letters that he wrote to numerous Federal and state agencies requesting that Respondents be investigated. The Federal agencies that Mr. Williams contacted include the U.S. Attorney General; the Civil Rights Division at the Department of Justice; the U.S. Attorney's Office for South Carolina; and U.S. Solicitor General's Office in South Carolina. The South Carolina state agencies in question include the Secretary of State; the Ethics Commission; the Tax Commission; the Election Commission; and the Governor. The complaint also includes portions of a law suit that Mr. Williams filed in 1990 in U.S. District Court in South Carolina. That case, however, does not concern any of the Respondents in this matter.

Indeed, Respondents all acknowledge that the Committee disbursed funds to Sunrise, but contend that these funds were not for the purpose of buying votes, an allegation Respondents flatly deny. Moreover, even if Respondents engaged in a vote-buying activity, this, in itself, would not constitute a violation within the Commission's jurisdiction.

Counsel for the Committee explains that his clients contracted with Sunrise for political consulting work in South Carolina, noting that the "Campaign paid Sunrise \$3,000 upon the signing of the consulting agreement and an additional \$6,000 in four equal monthly installments." Attachment A at 2, note 1.² Counsel produced a copy of this consulting agreement. Id. at 4-5. Respondents Andrew and Darrell Jackson similarly maintain that the Committee paid their company Sunrise pursuant to the terms of a consulting services agreement. Attachment B at 4 and 22. In their respective affidavits, Andrew and Darrell Jackson further state that "no funds were paid to any persons or organizations for the purpose of directly buying votes." Attachment B at 5 and 23.³ Finally, in his response, Heyward

2. Disclosure reports confirm that the Committee made several \$1,500 payments to Sunrise for "consulting fee[s]" during the time period covered by the contract. Disclosure reports also show that the Committee made an additional \$1,572.49 payment to Sunrise for printing and reproduction costs.

3. Counsel for these Respondents also explains that his clients believe that the complaint is based upon Mr. Williams' irrational hatred towards them. Attachment B at 1. According to counsel, Mr. Williams, "has been involved in a personal vendetta against my two clients." Id. Counsel included correspondence that the complainant purportedly sent his clients which documents the depth of Mr. Williams' feelings toward the Jacksons. Although the underlying cause of any disagreement between the complainant and

Bannister, confirms that Sunrise is in the business of providing "public relations and political consulting services" and that it had a contract for such services with the Committee. He denies, however, participating in the "'buying of votes' for Governor Bill Clinton or any other candidate." Attachment C at 2.⁴

In short, there is no credible evidence supporting the allegation that the payments made by the Committee to Sunrise were in connection with a "vote buying" scheme or that the Committee's payments to Sunrise would otherwise be in violation of the Act. Rather, it appears that the Committee paid Sunrise for consulting services. Accordingly, this Office recommends that the Commission find no reason to believe that any of the Respondents violated any provision of the Act in connection with the allegation concerning a vote-buying scheme.

B. Distribution of Campaign Literature

According to the Complainant, "[o]ver or nearly 1,000 persons attending the Bibleway Church of Atlas Rd. witnessed the distribution of Bill Clinton literature (by basically the membership of the church to these persons) a week before the

(Footnote 3 continued from previous page)
these Respondents is not entirely clear, it does appear that Mr. Williams is seeking some sort of vindication against them. For example, in one of his letters to the Jacksons, Mr. Williams states "you and your political friends should know by now that I am on a mission for God and that I will do whatever I said I would do." Id. at 16.

4. Mr. Bannister explains that during the time in question he was involved in Sunrise, but that he is now the owner and operator of a separate business, BANCO/Bannister Company. Attachment C at 1. In their affidavits, Andrew and Darrell Jackson aver that they are now the sole stockholders of Sunrise. Attachment B at 3 and 21.

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primary, at a church service." Complaint at 23 (letter to Hon. Gary R. Baker, Exec. Dir., State Ethics Comm'n, p. 6).

Complainant also alleges that Andrew and Darrell Jackson, the Pastor and Assistant Pastor, respectively, of the Church were advancing the candidacies of various candidates, including then Governor Clinton, from the pulpit of the Church. Complainant further states that "there is circumstantial evidence . . . that Darrell Jackson [and] Andrew Jackson . . . lobbied" the South Carolina Coalition of Black Church Leaders, Inc., demanding "that they, as well as their congregations, vote for Governor Bill Clinton" Id. at 22.

Under the Act, it is unlawful for any corporation to make a contribution or expenditure in connection with a Federal. 2 U.S.C. § 441b(a).⁵ It is also unlawful for any director or any officer of any corporation to consent to any contribution or expenditure prohibited under the Act. Id. In addition, it is unlawful for any Federal candidate and his or her political committees to knowingly accept or receive any contribution prohibited under the Act. Id. For purposes of Section 441b(a), a "contribution or expenditure" is defined to include "any direct or indirect payment, distribution, loan, advance, deposit, or gift of money, or any services, or anything of value made . . . in connection with any Federal election. 2 U.S.C. § 441b(b)(2). Corporations may, however, make certain expenditures in connection with Federal elections. For example,

5. According to the South Carolina Secretary of State's Office, the Church is a non-profit corporation.

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a corporation may make partisan communications "to its stockholders and executive or administrative personnel and their families . . . on any subject." 2 U.S.C. § 441b(b)(2)(A). Such communications may not, however, be made to the general public. 11 C.F.R. § 114.3(a). An incorporated membership organization is similarly permitted to make partisan communications "to its members and their families on any subject." 2 U.S.C. § 441b(b)(2)(A). Like corporations, however, incorporated membership organizations may only make these communications to their respective members and executive or administrative personnel, and their families. 11 C.F.R. § 114.3(a). They may not direct such communications to the general public. Id.

In response, counsel for the Committee neither confirms nor denies whether the literature in question was distributed. Rather, he maintains that "[t]he distribution of campaign literature to church members, by church members, following a church service . . . does not state any cognizable violation of the Act." Attachment A at 2. Similarly, in their response, Andrew and Darrell Jackson, who acknowledge in their respective affidavits that they are the Pastor and Assistant Pastor of the Church, neither confirm nor deny the allegation concerning the distribution of campaign literature. Attachments B. With regard to the Church's response, counsel relies upon the affidavits in Andrew and Darrell Jackson's response as well as an additional affidavit from Darrell Jackson, who states: "Many staff persons and parishioners of BIBLEWAY proudly supported President Clinton in the election of 1992 and some may have

supported former President Bush, but BIBLEWAY never officially endorsed or supported any candidate as a congregation."

Attachment D at 2.

Given the available information, many questions concerning this alleged violation of 2 U.S.C. § 441b(a) remain unanswered. For example, it is unclear whether any campaign literature was actually distributed and if so what it consisted of. The complaint references only one piece of campaign literature that was allegedly distributed and it is described as "a list of persons supporting Clinton and the reason for their support." Thus, assuming that campaign literature was distributed at the church, it is unknown at this time whether that material expressly advocated the election or defeat of any candidate.

Moreover, assuming that the Church qualifies as a membership organization, it is unclear who at the Church authorized the distribution of the material or whether that distribution extended to the general public. According to the Complainant, the literature was distributed in the presence of nearly 1,000 people and in an affidavit submitted in the Church's response, Darrell Jackson acknowledges that many "staff persons and parishioners" of the Church supported then-Governor Clinton's Presidential campaign. In addition, Andrew and Darrell Jackson have acknowledged that they are the Pastor and Assistant Pastor, respectively, of the Church and the available information also shows that at the time in question, the Jacksons, along with Heyward Bannister, owned Sunrise, which was under contract with the Committee to, inter alia, prepare

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campaign materials. In this regard, the Jacksons, Heyward Bannister, Sunrise and the Committee may have been involved in the alleged distribution of this literature.

In short, if the campaign literature in question expressly advocated the election or defeat of any candidate and if it was distributed to individuals beyond the Church's permissible class, then there would appear to be a violation of the Act. More information is needed to fully resolve these issues. Accordingly, this Office recommends that the Commission find reason to believe that the Church and Andrew Jackson and Darrell Jackson, as Officers of the Church; Sunrise and Andrew Jackson, Darrell Jackson and Heyward Bannister, as Officers of the Corporation; and the Committee and its treasurer each violated 2 U.S.C. § 441b(a) in connection with the alleged distribution of campaign literature at the Church.⁶

6. Although Darrell and Andrew Jackson have acknowledged that they are the Pastor and Assistant Pastor, respectively, of the Church, it is unclear whether they are Officers of the Church. In fact, telephone conversations between staff of this Office and the South Carolina Secretary of State's Office show that the Church has no named Officers or Directors. However, given their acknowledged roles at the church, they may nonetheless have decision making authority or other managerial roles and in this regard they would be considered Officers as that term is used in the Act. Additional information, however, is needed to resolve this issue.

III. RECOMMENDATIONS

1. Find reason to believe that the Bibleway Church of Atlas Road, Inc.; Andrew Jackson, as an Officer of the Church; Darrell Jackson, as an Officer of the Church; Sunrise Enterprise of Columbia, Inc.; Andrew Jackson, as an Officer of the Corporation; Darrell Jackson, as an Officer of the Corporation; Heyward Bannister, as an Officer of the Corporation; and the Clinton for President Committee and Robert A. Farmer, as treasurer, each violated 2 U.S.C. § 441b(a) in connection with the alleged distribution of campaign literature at the Bibleway Church of Atlas Road, Inc.
2. Find no reason to believe that any of the Respondents violated any provision of the Act in connection with the alleged vote-buying scheme.
3. Approve the attached Factual and Legal Analyses (6) and the appropriate letters (4).

Lawrence M. Noble
General Counsel

Date

9/1/93

BY:



Lois G. Lerner
Associate General Counsel

Attachments

- A. Response of the Committee
- B. Response of Andrew and Darrell Jackson
- C. Response of Heyward Bannister
- D. Response of the Church
- E. Proposed Factual and Legal Analyses (6)

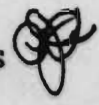
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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/BONNIE J. ROSS 
COMMISSION SECRETARY

DATE: SEPTEMBER 8, 1993

SUBJECT: MUR 3534 - FIRST GENERAL COUNSEL'S REPORT
DATED SEPTEMBER 1, 1993.

The above-captioned document was circulated to the
Commission on Thursday, September 2, 1993 at 4:00 p.m..

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

Commissioner Aikens	<u>XXX</u>
Commissioner Elliott	<u>XXX</u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u> </u>
Commissioner Potter	<u>XXX</u>
Commissioner Thomas	<u> </u>

This matter will be placed on the meeting agenda
for Tuesday, September 14, 1993.

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

93040960305

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 3534
Clinton for President Committee)
and Robert A. Farmer, as treasurer)
Andrew Jackson;)
Darrell Jackson;)
Heyward Bannister;)
Sunrise Enterprise of Columbia, Inc.;)
Bibleway Church of Atlas Road, Inc.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session on
September 14, 1993, do hereby certify that the Commission
decided by a vote of 5-0 to take the following actions in
MUR 3534:

1. Reject recommendation number one in the
General Counsel's September 1, 1993
report, and instead find no reason to
believe that the Bibleway Church of
Atlas Road, Inc.; Andrew Jackson, as an
Officer of the Church; Darrell Jackson
as an Officer of the Church; Sunrise
Enterprise of Columbia, Inc.; Andrew
Jackson, as an Officer of the Corporation;
Darrell Jackson, as an Officer of the
Corporation; Heyward Bannister, as an
Officer of the Corporation; and the
Clinton for President Committee and
Robert A. Farmer, as treasurer, each
violated 2 U.S.C. § 441b(a) in
connection with the alleged distribution
of campaign literature at the Bibleway
Church of Atlas Road, Inc.

(continued)

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2. Find no reason to believe that any of the Respondents violated any provision of the Federal Election Campaign Act, as amended, in connection with the alleged vote-buying scheme.
3. Close the file.
4. Direct the Office of General Counsel to send appropriate letters pursuant to the above-noted actions.

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

Attest:

9-15-93
Date

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 23, 1993

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Robert Lee Williams
104 McNeely Road
Columbia, South Carolina 29223

RE: MUR 3534

Dear Mr. Williams:

On September 14, 1993, the Federal Election Commission (the "Commission") reviewed the allegations of your complaint dated May 22, 1992. On the basis of the information provided in your complaint, and information provided by the Respondents, the Commission found no reason to believe any of the Respondents in this matter violated any provision of the Federal Election Campaign Act of 1971, as amended, in connection with the alleged vote-buying scheme. The Commission also found no reason to believe that any of these Respondents violated 2 U.S.C. § 441b(a) in connection with an alleged distribution of campaign literature at the Bibleway Church of Atlas Road, Inc. Accordingly, on September 14, 1993, the Commission closed the file in this matter. A Statement of Reasons providing a basis for the Commission's decision will follow.

The Federal Election Campaign Act of 1971, as amended ("the Act") allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

Enclosures

General Counsel's Report
Certification of Commission action

93040960308



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 23, 1993

Anthony S. Harrington, Esq.
General Counsel
Clinton for President Committee, Inc.
Hogan and Hartson
Columbia Square
555 Thirteenth Street, N.W.
Washington, D.C. 20004

RE: MUR 3534

Dear Mr. Harrington:

On June 5, 1992, the Federal Election Commission notified your clients, the Clinton for President Committee, Inc., and Robert A. Farmer, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 14, 1993, the Commission found, on the basis of the information in the complaint, and information provided by you on behalf of your clients, that there is no reason to believe your clients violated any provision of the Federal Election Campaign Act of 1971, as amended, in connection with the alleged vote-buying scheme and no reason to believe that your clients violated 2 U.S.C. § 441b(a) in connection with the distribution of campaign literature at the Bibleway Church of Atlas Road, Inc. Accordingly, the Commission closed its file in this matter. A Statement of Reasons explaining the Commission's determination will follow.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record,

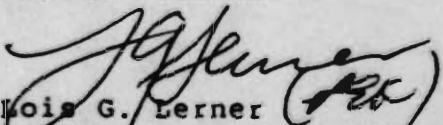
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Anthony S. Harrington, Esq.
Page 2

please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

BY:  Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

93040960310



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1993

J. Lewis Cromer, Esq.
Cromer & Mabry
1225 Pickens Street
Columbia, South Carolina 29201

RE: MUR 3534

Dear Mr. Cromer:

On June 5, 1992, the Federal Election Commission notified your clients, Darrell Jackson and Andrew Jackson, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. Thereafter, on July 16, 1992, this Office notified you that the complainant had submitted additional information pertaining to the allegations in the complaint. A copy of that additional information was provided to you at that time. In addition, on August 4, 1993, this Office notified your other client, the Bibleway Church of Atlas Road, Inc., of the complaint in this matter.

On September 14, 1993, the Commission found, on the basis of the information in the complaint, and information provided by you on behalf of your clients, that there is no reason to believe your clients violated any provision of the Federal Election Campaign Act of 1971, as amended, in connection with the alleged vote-buying scheme and no reason to believe that your clients violated 2 U.S.C. § 441b(a) in connection with the alleged distribution of campaign literature at the Bibleway Church of Atlas Road, Inc. Accordingly, the Commission closed its file in this matter. A Statement of Reasons explaining the Commission's determination will follow.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record,

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J. Lewis Cromer, Esq.
Page 2

please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

BY:  (JEL)
Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

93040960312



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 23, 1993

Sunrise Enterprise of Columbia, Inc.
Heyward Bannister, Registered Agent
BANCO Bannister Company
106 Doctor's Circle, Suite C
P. O. Box 3427
Columbia, South Carolina 29230

RE: MUR 3534

Dear Mr. Bannister:

On June 5, 1992, the Federal Election Commission notified you of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On September 14, 1993, the Commission found, on the basis of the information in the complaint, and information provided by you, that there is no reason to believe you or Sunrise Enterprise of Columbia, Inc., violated any provision of the Federal Election Campaign Act of 1971, as amended, in connection with the alleged vote-buying scheme and no reason to believe that you or Sunrise Enterprise of Columbia, Inc., violated 2 U.S.C. § 441b(a) in connection with the alleged distribution of campaign literature at the Bibleway Church of Atlas Road, Inc. Accordingly, the Commission closed its file in this matter. A Statement of Reasons explaining the Commission's determination will follow.

The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record,

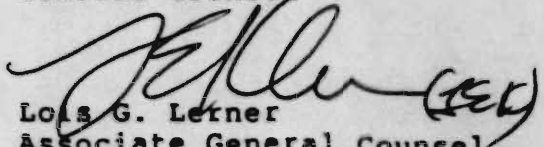
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Sunrise Enterprise of Columbia, Inc.
Heyward Bannister, Registered Agent
Page 2

please do so as soon as possible. While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt.

Sincerely,

Lawrence M. Noble
General Counsel

BY:  (LL)
Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

23040960314



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3534

DATE FILMED 9/28/93 CAMERA NO. 4

CAMERAMAN E.E.S.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463



Microfilm

Public Rcds

Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3534.

11/24/93

93040962256



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MEMORANDUM

TO: COMMISSIONERS
GENERAL COUNSEL NOBLE
STAFF DIRECTOR SURINA
PRESS OFFICER EILAND

FROM: MARJORIE W. EMMONS/JEAN FEUER *23*
SECRETARY OF THE COMMISSION

DATE: October 8, 1993

SUBJECT: STATEMENT OF REASONS FOR MUR 3534

Attached is a copy of the Statement of Reasons in MUR 3534 signed by all Commissioners. This was received in the Commission Secretary's Office on October 7, 1993 at 4:34 P.M.

93040962257



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20461

STATEMENT OF REASONS

In the matter of:

Clinton for President Committee and)
Robert A. Farmer, as treasurer,)
Andrew Jackson,)
Darrell Jackson,) MUR 3534
Heyward Bannister,)
Sunrise Enterprise of Columbia, Inc.,)
Bibleway Church of Atlas Road, Inc.)

On September 14, 1993, the Federal Election Commission voted to reject the recommendation of the Office of General Counsel to find reason to believe the above-named Respondents violated 2 U.S.C. §441b(a) in connection with an alleged distribution of campaign literature at the Bibleway Church of Atlas Road, Inc. Instead, the Commission voted unanimously to find no reason to believe §441b of the FECA was violated and closed the file.

The General Counsel's Report in this matter correctly noted that Mr. Robert Lee Williams, the Complainant in this matter, had submitted a rather lengthy and disjointed complaint that did not cite to any specific statutory provision that the Respondents allegedly violated. 1st GC Report at 1-2. Nevertheless, the General Counsel was able to decipher two allegations: (1) that the Respondents engaged in a "vote buying scheme" and (2) that the Respondents distributed partisan campaign material at the Bibleway Church. 1st GC Report at 2.

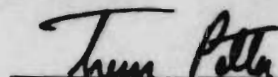
We agreed with the General Counsel that there was no reason to believe any of the Respondents violated any provision of the Federal Election Campaign Act in connection with the alleged vote-buying scheme. We declined, however, to adopt the General Counsel's recommendation to investigate the distribution of Clinton campaign literature at the Bibleway Church as a partisan communication sent beyond the restricted class of a "membership organization." 1st GC Report at 8.

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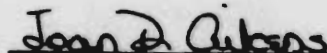
Several reasons supported our decision. First, the complaint was quite vague regarding the content of the literature, who may have distributed it, and to whom it was allegedly given. Second, there was a lack of evidence indicating the literature was distributed on behalf of the Bibleway Church or at its expense. Third, any investigation of this case would require a significant amount of Commission resources and a thorough legal analysis of what statutes, if any, were violated by the alleged activity. Last, the extent of the alleged activity appeared to be rather small. Accordingly, in the proper ordering of our priorities and resources, see Heckler v. Chaney, 470 U.S. 821 (1985) we unanimously agreed that a finding of "no reason to believe" would be appropriate in this case.



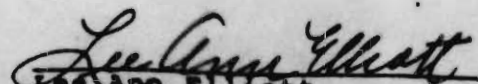
Scott E. Thomas
Chairman



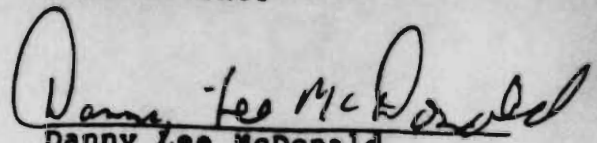
Trevor Potter
Vice Chairman



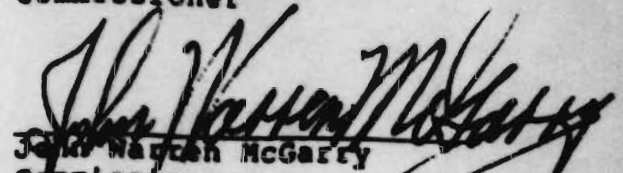
Joan D. Aikens
Commissioner



Lee Ann Elliott
Commissioner



Danny Lee McDonald
Commissioner



John Warren McGarry
Commissioner

October 7, 1993

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FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463



Microfilm

Public Records

Press

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR. 3534.

12/17/93

93040962346



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DECEMBER 3, 1993

Robert Lee Williams
104 McNeely Road
Columbia, South Carolina 29223

RE: MUR 3534

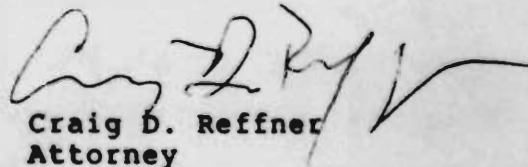
Dear Mr. Williams:

By letter dated September 23, 1993, the Office of the General Counsel informed you of determinations made with respect to the complaint filed by you against the Clinton for President Committee, Inc., and Robert A. Farmer, as treasurer; Andrew Jackson; Darrell Jackson; Heyward Bannister; Sunrise Enterprise of Columbia, Inc.; and the Bibleway Church of Atlas Road, Inc. Enclosed with that letter was the First General Counsel's Report.

Enclosed please find a Statement of Reasons adopted by the Federal Election Commission explaining its decision to reject this Office's recommendation that the Commission find reason to believe the Respondents in this matter violated 2 U.S.C. § 441b(a) in connection with the alleged distribution of campaign literature at the Bibleway Church of Atlas Road, Inc. This document will be placed on the public record as part of the file of MUR 3534.

If you have any questions, please contact me at
(202) 219-3400.

Sincerely,


Craig D. Reffner
Attorney

Enclosures
Statement of Reasons

93040962347



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DECEMBER 3, 1993

J. Lewis Cromer, Esq.
Cromer & Mabry
1225 Pickens Street
Columbia, South Carolina 29201

RE: MUR 3534

Dear Mr. Cromer:

Enclosed please find a Statement of Reasons adopted by the Federal Election Commission explaining its decision to reject this Office's recommendation that the Commission find reason to believe your clients, Darrell Jackson, Andrew Jackson and the Bibleway Church of Atlas Road, Inc., violated 2 U.S.C. § 441b(a) in connection with the alleged distribution of campaign materials at the Bibleway Church of Atlas Road, Inc. This document will be placed on the public record as part of the file of MUR 3534.

If you have any questions, please contact me at
(202) 219-3400.

Sincerely,

A handwritten signature in cursive script, reading "Craig D. Reffner", is written over the typed name.

Craig D. Reffner
Attorney

Enclosure
Statement of Reasons

93040962348



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

DECEMBER 3, 1993

Anthony S. Harrington, Esq.
General Counsel
Clinton for President Committee, Inc.
Hogan and Hartson
Columbia Square
555 Thirteenth Street, N.W.
Washington, D.C. 20004

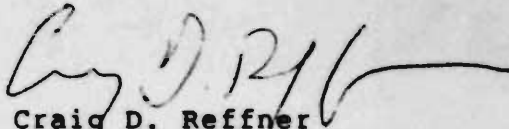
RE: MUR 3534

Dear Mr. Harrington:

Enclosed please find a Statement of Reasons adopted by the Federal Election Commission explaining its decision to reject this Office's recommendation that the Commission find reason to believe your clients, the Clinton for President Committee, Inc., and Robert A. Farmer, as treasurer, violated 2 U.S.C. § 441b(a) in connection with the alleged distribution of campaign materials at the Bibleway Church of Atlas Road, Inc. This document will be placed on the public record as part of the file of MUR 3534.

If you have any questions, please contact me at
(202) 219-3400.

Sincerely,


Craig D. Reffner
Attorney

Enclosure
Statement of Reasons

93040962349



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DECEMBER 3, 1993

Sunrise Enterprise of Columbia, Inc.
Heyward Bannister, Registered Agent
BANCO Bannister Company
106 Doctor's Circle, Suite C
P. O. Box 3427
Columbia, South Carolina 29230

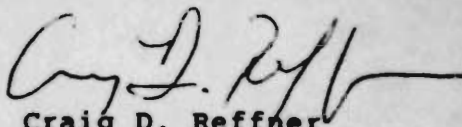
RE: MUR 3534

Dear Mr. Bannister:

Enclosed please find a Statement of Reasons adopted by the Federal Election Commission explaining its decision to reject this Office's recommendation that the Commission find reason to believe you and Sunrise Enterprise of Columbia, Inc., violated 2 U.S.C. § 441b(a) in connection with the alleged distribution of campaign materials at the Bibleway Church of Atlas Road, Inc. This document will be placed on the public record as part of the file of MUR 3534.

If you have any questions, please contact me at
(202) 219-3400.

Sincerely,


Craig D. Reffner
Attorney

Enclosure
Statement of Reasons

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