



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20004

THIS IS THE BEGINNING OF MUR # 415



54110

PS Form 3811 Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 441

1. SENDER (Print name and complete return address. RETURN TO space on front)

2. ARTICLE ADDRESSED TO
John R. Hamilton Esq
Union First Bank Bldg
Wash. DC 20005

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above:
 SIGNATURE *[Signature]* ADDRESS *[Address]* (Print name and address of agent)

4. DATE OF DELIVERY POSTMARK

5. ADDRESS Complete only if requested

6. UNABLE TO DELIVER BECAUSE CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

1100 L STREET, N.W.
WASHINGTON, D.C. 20543

February 21, 1978

John R. Hamilton, Esquire
Hamilton & Hamilton
Union First Bank Building
Washington, DC 20005

Re: 415(77)

Dear Mr. Hamilton:

On February 8, 1978, the Commission voted to terminate its investigation of your clients, Union First National Bank and Mr. Charles Daniel, in the above referenced matter. Accordingly, the Commission intends to close its file.

A copy of the Commission's determination is enclosed for your information. If you have any questions, please contact Gloria R. Sulton (202-523-4057), the attorney assigned to this matter.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

Enclosure



7 3 7 4 1 1 , 3 ; ,
John R. Hamilton, Esquire
Hamilton & Hamilton
Union First Bank Building
Washington, DC 20005

Re: 415(77)

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Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 4N *Sulton*

● **SENDER** Complete items:
Add your address in the "RETURN TO" space on reverse.

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2. ARTICLE ADDRESSED TO
John R. Bolton Esq.
585 16th St NW
Wash. DC 20006

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
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(Always obtain signature of addressee or agent)

I have received the article described above
SIGNATURE ☒ Addressee ☐ Authorized agent
[Signature]

4. DATE OF DELIVERY *2-2-78* **POSTMARK**

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FEDERAL ELECTION COMMISSION

1100 L STREET, N.W.
WASHINGTON, D.C. 20543

February 21, 1978

John R. Bolton, Esquire
Covington & Burling
888 16th Street N.W.
Washington, DC 20006

Re: 413(77)

Dear Mr. Bolton:

On February 8, 1978, the Federal Election Commission voted to terminate its investigation of the Republican Congressional Boosters Club in the above referenced matter. Accordingly, the Commission intends to close its file.

A copy of the Commission's determination is enclosed for your information. If you have any questions, please contact Gloria R. Sulton (202-508-4057), the attorney assigned to this matter.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "W. C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

Enclosure

cc: Mr. L. Lee Potter



7 8 0 4 1 0 0 5 8 6 1

John R. Bolton, Esquire
Covington & Burling
888 16th Street N.W.
Washington, DC 20006

Re: 415(77)

Dear Mr. Bolton:

On February 8, 1978, the Federal Election Commission voted to terminate its investigation of the Republican Congressional Boosters Club in the above referenced matter. Accordingly, the Commission intends to close its file.

A copy of the Commission's determination is enclosed for your information. If you have any questions, please contact Gloria R. Sulton (202-523-4057), the attorney assigned to this matter.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

cc: Mr. I. Lee Potter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National Bank,)
Charles Daniel, President)
Union First National Bank)
and Republican Congressional)
Booster Club)

M # 41: (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 3, 1978, the following motion before the Commission in the above-captioned matter failed to pass:

MOVED that the Commission adopt the General Counsel's recommendation to find reasonable cause to believe that the Union First National Bank, Charles Daniel, and the Republican Congressional Boosters Club violated 2 U.S.C. Section 441b in connection with banking services provided to the Boosters Club.

The vote was:

YEA (1) Commissioner Harris

NAY (3) Commissioners Atkins, Staebler, and Thomson

Commissioner Springer recused himself from participation in the discussion of this matter and from voting on the above motion. Commissioner Tiernan was not present at the time of the discussion and vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National Bank.)
Charles Daniel, President)
Union First National Bank)
and Republican Congressional)
Boosters Club)

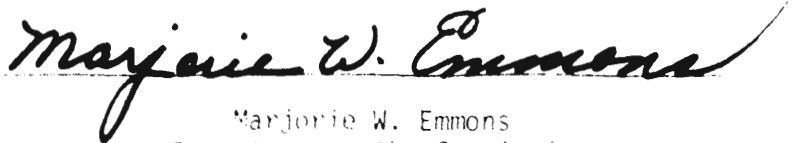
MUR 415 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary, to the Federal Election Commission, do hereby certify that on February 8, 1978, the Commission determined by a vote of 4-2 to close the file in the above-captioned matter.

Voting for this determination were Commissioners Aikens, Harris, Staebler, and Thomson. Commissioner Springer recused himself from participation in the discussion and vote on this matter, and Commissioner Tiernan was not present at the time of the discussion and the vote.

Accordingly, the file in this matter has been closed.



Marjorie W. Emmons
Secretary to the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National Bank.)
Charles Daniel, President)
Union First National Bank)
and Republican Congressional)
Booster Club)

MUR 415 (11)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 8, 1978, the following motion before the Commission in the above-captioned matter failed to pass:

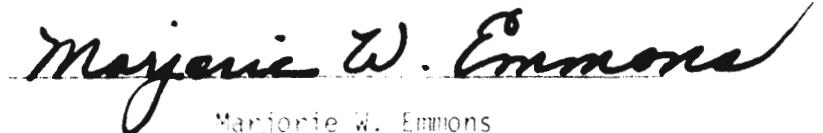
MOVED that the Commission adopt the General Counsel's recommendation to find reasonable cause to believe that the Union First National Bank, Charles Daniel, and the Republican Congressional Boosters Club violated 2 U.S.C. Section 441b in connection with banking services provided to the Boosters Club.

The vote was:

YEA (1) Commissioner Harris

NAY (3) Commissioners Aikens, Staebler, and Thomson

Commissioner Springer recused himself from participation in the discussion of this matter and from voting on the above motion. Commissioner Tiernan was not present at the time of the discussion and vote.



Marjorie W. Emmons
Secretary to the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

January 31, 1978

In the Matter of)	
)	
Union First National Bank)	
Charles Daniel, President)	MUR 415(77)
Union First National Bank)	
and Republican Congressional)	
Boosters Club)	

GENERAL COUNSEL'S REPORT

I. Allegations

This matter was initiated based upon findings by the Audit Division in the course of its examination of the books and records of the Republican Congressional Boosters Club (hereinafter "Boosters"). The audit report indicated that Ms. June Dean, an employee of the Union First National Bank (hereinafter "Bank") performed certain services for Boosters' accounts at the bank which might be contributions prohibited under 2 U.S.C. §441b. Respondent Daniel is president of the bank and was treasurer of Boosters until November 1977. He appointed Ms. Dean to perform certain services on behalf of Boosters.

II. Evidence

On July 28, 1977, the Commission found reason to believe that the three respondents had committed violations of 2 U.S.C. §441b.

On August 12, 1977, the Bank responded by submitting an affidavit signed by Ms. Dean. Ms. Dean stated that she is an Assistant Vice President of the Bank and performs certain "ordinary" banking services for Boosters' accounts. Among those services are: making deposits and transfers between Boosters' accounts, signing checks on two accounts, and reconciling those accounts. Ms. Dean also stated that Bank employees have undertaken such services before for similar "civic and charitable groups."

Boosters responded on August 12, 1977, with an affidavit signed by I. Lee Potter, Executive Director. Mr. Potter stated that Ms. Dean performed the regular and customary services which banks undertake for their depositors including making deposits and arranging transfers between Boosters' accounts, signing checks, and balancing the check books for two of Boosters' accounts.

On October 19, 1977, the Commission voted to send interrogatories to Mr. Potter, Mr. Daniel and Ms. Dean. The interrogatories were sent to counsel for those persons on December 9, 1977. Responses were received from Mr. Potter on December 23, 1977, and Mr. Daniel and Ms. Dean on December 29, 1977. Ms. Dean submitted a supplemental answer to question 20 on January 10, 1978, pursuant to our request.

Mr. Potter in answer to the Commission's interrogatories identified the accounts maintained by Boosters at the Union First National Bank. These accounts include an operations account to pay all administrative expenses of Boosters' operations, contributions account from which funds for candidates are withdrawn, a certificate of deposit used to pay necessary taxes to the Federal and District of Columbia Governments, an interest account to draw interest, and a savings account. Mr. Potter described the procedures whereby contributors' checks and acknowledgements are handled. These procedures do not involve the services of the Bank. Mr. Potter instructs Ms. Dean to transfer funds, issue checks, and perform other services with respect to the Boosters' accounts and certificates of

deposit. Mr. Potter in answer to a question regarding a cover letter signed by Ms. June Dean submitted with a report filed with the Federal Election Commission indicated that the report was prepared by an employee of Boosters.

Ms. Dean in her answers stated that upon request she made out and signed checks to candidates and sent them to the Boosters Club, opened accounts and transferred funds, recorded deposits and checks in the check books, and verified the balance with Boosters at the end of the month. She estimates that she spent approximately forty-five minutes per week performing these services. Ms. Dean further indicated that she performs services for approximately ten other depositors of the same or similar nature as the services provided on behalf of Boosters with the exception that she does not keep the check books. Neither Boosters nor the other depositors for which she performs services are required to maintain compensating balances in order to receive her services. The services provided to Boosters, Ms. Dean states, would be provided to any customer making a request under a Bank service described as "executive banking." A copy of Union First's

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"Banking Services Handbook" was provided and that portion of the handbook describing executive banking services is attached hereto. While the banking handbook states that any person having a certain income may request executive banking services, Ms. Dean indicates that the criteria used by the Bank to determine which customers are offered services such as those offered Boosters is whether the customer is a charitable, non-profit or civic organization establishing an "advantageous banking relationship." Ms. Dean performs the services on behalf of Boosters during her normal working day.

Ms. Dean in her first response to question 20 indicated that she had prepared reports on behalf of Boosters similar to the attached Exhibit 1. In an additional response to that question, Ms. Dean states that she prepared approximately 17 reports of receipts and expenditures between January 1973 through July 1974. These reports were filed with the Clerk of the House and the Secretary of the Senate, and they number approximately 400 pages.

Mr. Daniel, in answer to the interrogatories, indicates that his services on behalf of Boosters both in his capacity as president of the Bank and as

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treasurer were minimal and consumed approximately ten minutes per month. Although he states that the services performed by Ms. Dean are not customarily offered by the Bank, approximately eight officers or employees act as treasurers for similar charitable, non-profit or civic organizations. Mr. Daniel also indicates that the criterion used by the Bank to determine whether a depositor will be offered such services similar to those rendered by Ms. Dean on behalf of Boosters is whether the customer is a charitable, non-profit, or civic organization establishing an "advantageous banking relationship." He also refers to the banking services handbook as a guide to the Bank's services available to depositors.

Copies of the responses from all three individuals are attached hereto along with requested information and relevant parts of the banking services handbook.

III. Analysis and Recommendations

2 U.S.C. §441b makes it unlawful for any national bank to make a contribution or expenditure in connection with any election, or for an officer of a national bank to consent to the making of a contribution or expenditure in connection with any election. Similarly the statute

prohibits the knowing acceptance or receipt of a contribution by a political committee.

We reviewed relevant banking regulations to determine the extent to which customer services are regulated. Regulations deal with banks' assisting customers in preparing tax returns and disbursing payroll funds to employees of their customers. 12 CFR §7.7430 and §7.7485. The regulations also provide that all charges to customers should be arrived at by each bank on a competitive basis and not through any discussion among banks. 12 CFR §7.8000. In view of the latter ruling, we believe it is unnecessary to compare services among national banks, since such services and charges should be arrived at on an independent competitive basis. Moreover, we note that we are dealing with direct "contributions" under 2 U.S.C. §441b rather than bank "loans", so the "ordinary course of business" standard of 2 U.S.C. §431(e)(5)(G) is inapplicable.

While there are minor discrepancies between Ms. Dean's answers and those of Mr. Daniel with respect to what services are customarily offered to the Bank's depositors, the services provided by the Bank to Boosters appear consistent with those provided by the Bank to civic, charitable and non-profit organizations- with the exception of preparing disclosure reports and keeping checkbooks. The

banking services handbook indicates that "executive banking" includes the attention of a bank executive who can handle all the clients' banking needs, monthly financial review which summarizes all of the banking relationships which the client designates, checking and overdraft protection, 24 hour banking, preferred loan rates, and eligibility for an American Express gold card. The banking services handbook states that a "personal banker" is "a bank executive who can handle all the client's banking needs." (emphasis added). We believe that completing disclosure reports by the Bank is not within the "banking needs" of Boosters. This service provided by the Bank to Boosters during the period between January 1973 and July 1974, and the keeping of check books by Ms. Dean, appear to be outside the normal and customary services available to other "Executive Banking" clients. In effect, as Mr. Daniel's response indicates, Ms. Dean essentially performed most duties central to the responsibility of a treasurer for a political committee.

It is the opinion of the General Counsel's office that these services constituted contributions in-kind to Boosters by the Bank. Since Mr. Daniel assigned Ms. Dean to service Boosters' accounts in March 1974,

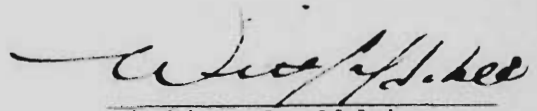
we believe he has consented to the making of the contribution by the Bank. Further, Boosters has continuously accepted the services provided by the Bank through Ms. Dean without making reimbursement of any kind.

IV. Recommendations

1. Find reasonable cause to believe that the Union First National Bank, Charles Daniel, and the Republican Congressional Boosters Club violated 2 U.S.C. §441b in connection with banking services provided to the Boosters Club.

2. Send the attached letters.

2/3/78
DATE


William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1155 K STREET N.W.
WASHINGTON, D.C. 20563

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Bolton, Esquire
Covington & Burling
888 16th Street N.W.
Washington, DC 20006

Re: MUR 415(77)

Dear Mr. Bolton:

On 1978, the Federal Election Commission found reasonable cause to believe that the Republican Congressional Boosters Club had violated 2 U.S.C. §441b in connection with its acceptance of certain banking services from the Union First National Bank.

The Commission has a duty to attempt to correct violations for a period of 30 days through informal methods of conference, conciliation and persuasion and to attempt to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). I am enclosing a proposed conciliation agreement which I am prepared to recommend that the Commission accept in this matter.

If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 202-523-4057 or toll free 800-424-9530.

Sincerely yours,

William C. Oldaker
General Counsel

cc: Mr. I. Lee Potter

Enclosures





FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, DC 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Hamilton, Esquire
Hamilton & Hamilton
Union First Bank Building
Washington, DC 20005

Re: MUR 415(77)

Dear Mr. Hamilton:

On 1978, the Commission found reasonable cause to believe that your clients, Union First National Bank, and Mr. Charles Daniel had violated 2 U.S.C. §441b in connection with certain banking services provided to the Republican Congressional Boosters Club.

The Commission has a duty to attempt to correct violations for a period of 30 days through informal methods of conference, conciliation and persuasion and to attempt to enter into a conciliation agreement. 2 U.S.C. §437g(a)(5)(A). I am enclosing a proposed conciliation agreement which I am prepared to recommend that the Commission accept in this matter.

If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 202-523-4057 or toll free 800-424-9530.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



DOC 234.

COVINGTON & BURLING

888 SIXTEENTH STREET, N.W.

WASHINGTON, D.C. 20006

DEC 23 1977 8:55

TELEPHONE
(202) 452-6000

TW: 70-822-0006

TELE: 89-593

CABLE: COVLING

WRITERS DIRECT DIAL NUMBER

(202) 452-6418

7-2733

HAND DELIVERED

December 23, 1977

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006



Re: MUR 415 (77)

Dear Mr. Oldaker:

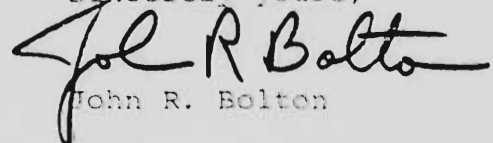
Enclosed herewith are the Answers, under oath, of Mr. I. Lee Potter, Executive Director of the Republican Congressional Boosters Club (hereafter, the "Boosters Club") to Interrogatories propounded to him by the Federal Election Commission. These Interrogatories, enclosed with a cover letter to me, were received on December 13, 1977.

I would like to reiterate the points I made in my letter to you of August 12, 1977. There is just no evidence whatever to support, under any legal theory, the allegation that the Union First National Bank has made a contribution to the Boosters Club. The enclosed Answers to the Commission's Interrogatories, and Mr. Potter's previous statement, demonstrate convincingly that Union First performed only normal banking functions for the Boosters Club.

I trust, as you say in your letter to me of December 9, that it will now be possible for the Commission "to conclude its investigation into this matter expeditiously" by dismissing this Matter Under Review.

If you or Ms. Sulton have any further questions on this subject, please do not hesitate to get in touch with me.

Sincerely yours,



John R. Bolton

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National Bank) MUR 415 (77)
Republican Congressional)
Boosters Club)

ANSWERS OF I. LEE POTTER
TO THE COMMISSION'S INTERROGATORIES

1. What are your duties as Executive Director of Boosters?

A. I am responsible for all matters concerning the day-to-day operation of the Republican Congressional Boosters Club (hereafter, the "Boosters Club"), including but not limited to fundraising activities and determining to which Republican candidates for election to the House and Senate the Boosters Club will make contributions.

2. Describe each savings account, checking account, and any other type of deposit maintained at the Union First National Bank by Boosters from January 1976 to the present date including the number for each such account.

3. For each account described in your answer to Interrogatory # 2 above, state the purpose of the account (e.g., operating expenses account, contributions account, etc.).

A. The following are the Boosters Club's accounts at the Union First National Bank, together with the purposes to which monies from these accounts are put:

Operations Account #3-141-959 -- to pay all administration expenses of Boosters Club operations, including salaries and expenses as well as cost of Boosters Club meetings in various cities in the United States;

Contributions Account #3-506-991 -- to provide funds for candidates for election to the House and Senate;

Certificate of Deposit - #05-011-5-500437 - to pay necessary taxes to the Federal Government and the District of Columbia (monies in this account come from the Contributions Account to draw short and long-term interest);

Interest Account #0-287-776 - to draw interest (monies in this account come from the Savings Account and Certificate of Deposit);

Savings Account #11-115-152 - to draw interest.

4. What specific services have been performed by Ms. June Dean with respect to accounts and certificates of deposit at Union First National Bank?

A. The services performed by Mrs. Dean are set forth in my statement of August 11, 1977.

5. Describe the procedure whereby contributors' checks and acknowledgements are handled from the time a check is received by Boosters, including but not limited to:
- (a) Where is the check received?
 - (b) Who prepares a deposit slip for the check?
 - (c) Who records the name, address, and other information regarding the contributor?
 - (d) Who endorses the check?
 - (e) How is the check delivered to the bank?
 - (f) Who prepares an acknowledgement letter to the contributor?
 - (g) Under whose name is an acknowledgement letter sent?
 - (h) Is a receipt given to the contributor in addition to or in lieu of a letter? If so, who prepares the receipt, signs it, and mails it to the contributor?

3.

A. The following are the procedures currently utilized by the Boosters Club for receiving contributor's checks and for making acknowledgements:

(a) Checks are received at the Boosters Club's office at 300 First Street, S.E., Washington, D.C., 20003.

(b) Deposit slips are prepared by either Miss Vera F. Lopp or Mrs. Cathy Roth; both are full-time employees of the Boosters Club.

(c) The name, address and other items of contributor information are recorded by either Miss Lopp or Mrs. Roth.

(d) Either Miss Lopp or Mrs. Roth stamps the back of each check "For Deposit Only" to account number 11-115-152.

(e) The checks are mailed to the bank.

(f) Acknowledgement letters are sent over the signature of the Executive Director.

(h) Yes. The receipt is prepared by either Miss Lopp or Mrs. Roth and enclosed with the acknowledgement letter.

6. Who instructs Ms. June Dean to transfer funds, issue checks, and perform other actions with respect to Boosters' accounts and certificates of deposit?

A. I do.

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4.

7. Does Ms. Dean have sole signature authority on the accounts identified in your answer to Interrogatory #2? If not, identify the other signatories and describe the combination of signatures which are authorized to sign checks.

A. Only the Operations Account and the Contributions Account are checking accounts.

Checks drawn on the Operations Account are signed by any two of the following: Mr. Edward F. Terrar, Jr., Deputy Executive Director; Miss Lepp; Mrs. Roth; or me, as Executive Director.

Checks drawn on the Contributions Account are signed by Mr. David S. Smith. Mr. Smith replaced Mr. Charles Daniel as Treasurer of the Boosters Club on November 15, 1977, and Mrs. Dean has not had signatory power since that time.

8. What services are performed by Mr. Charles Daniel with respect to Boosters' accounts and certificates of deposit at Union First National Bank?

A. Mr. Daniel performs no such services for the Boosters Club. He has advised me from time to time on the interest rates the bank was then paying on certificates of deposit.

9. What services are performed by Mr. Charles Daniel as treasurer of Boosters?

A. As I stated in response to Interrogatory Seven, Mr. Daniel is no longer the Treasurer of the Boosters Club. During the time he was the Treasurer, he carried out the duties of the Treasurer of a political committee as required by the Federal Election Campaign Act.

5.

10. Referring to Exhibit 1 attached hereto, identify the person who prepared the cover letter and accompanying FEC Schedule A forms attached thereto.

A. Exhibit 1 was prepared by Miss Martha Spenger, a former employee of the Boosters Club. Miss Spenger left the employ of the Boosters Club on December 31, 1976.

11. If your answer to Interrogatory #10 above identifies someone not employed by Boosters at the time the report was prepared, explain how that individual had access to the reported information.

A. Miss Spenger was an employee of the Boosters Club at the time Exhibit 1 was prepared.

I. Lee Potter
I. LEE POTTER

SUBSCRIBED AND SWORN TO
before me this 21st day
of December, 1977.

G. Thomas Wright
G. THOMAS WRIGHT
Notary Public, May 15, 1978

JCC 2356
NRW

HAMILTON AND HAMILTON
UNION FIRST BANK BUILDING
WASHINGTON, D. C. 20005

GEORGE E. HAMILTON SR. 1853-1946

TELEPHONE 202-341-2002

MARYLAND OFFICE
27 W. JEFFERSON STREET
ROCKVILLE, MARYLAND 20850
(301) 240-2551

GEORGE E. HAMILTON
WILLIAM A. GLASGOW
JOHN L. HAMILTON
GEORGE E. HAMILTON III
STEPHEN W. TRIMBLE
RICHARD W. TURNER
NICHOLAS C. WARD
DANIEL W. McEVILLY

December 29, 1977

WILLIAM F. BECKER
OF COUNSEL

ALSO MEMBER OF N. BAR

10/27

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20006

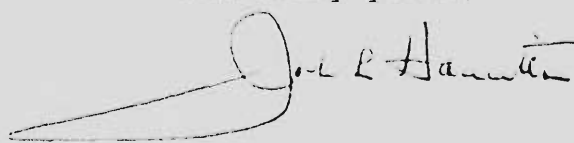
Re: MUR 415 (77)

Dear Mr. Oldaker:

I enclose herewith the Answers of Colonel Charles Daniel, President of the Union First National Bank, and Mrs. June Dean, Assistant Vice President of the Bank. The interrogatories were received December 13, 1977 by my partner, Mr. Glasgow, and are forwarded to you today pursuant to our conversation with Mrs. Gloria R. Sulton as reported to you in my letter of December 19, 1977.

I am advised that Colonel Daniel is no longer treasurer of the Republican Congressional Boosters Club, having resigned said position on November 15, 1977. From my discussions with Colonel Daniel and Mrs. Dean, I am convinced that Union First performed only ordinary banking functions for the Boosters Club and that there was no intent to violate nor was there any infraction of the Federal Election Campaign Laws by either. If either you or Mrs. Sulton have any questions that have not been answered, please contact me. If necessary, I will be very happy to sit down and discuss the matters in person with either of you.

Sincerely yours,



JLH:cb

candidates and sent them to Boosters Club. Opened accounts as requested and transferred funds as requested. Recorded deposits and checks in checkbook. Verified balance with Boosters at month end.

6. In 1976, approximately how many hours per week did you spend performing the services described in your answer to Interrogatory #5 above?

ANSWER: Forty-five minutes at most, many weeks, no time at all.

7. For how many Boosters' accounts do you have signature authority? Please describe each such account by name, number and purpose.

ANSWER: Four (4).

(A) Republic Congressional Boosters Club - #3-506-991. Contributors accounts -- all contributions are deposited to this account and all checks to candidates are drawn from this account.

(B) Boosters Club Interest Account - Checking #3-524-159. Opened and maintained by funds received as interest on savings accounts and certificates of deposit to pay federal income taxes on donations other than cash.

(C) Republican Congressional Booster Club - Savings Account #11-114-563. Under instructions from Mr. Potter opened account to obtain interest at time when certificate of deposit rates were lower than regular interest.

(D) Republic Congressional Boosters Club - Savings Account #11-115-152. Same as above.

8. Who instructs you to issue checks and make deposits or transfers with respect to the Boosters' accounts and certificates of deposits at Union First National Bank?

ANSWER: Mr. Potter instructs Colonel Daniel by letter which is passed on to me, but I do not make deposits.

In the Matter of)
) MUR 415(77)
Union First National Bank)
Republican Congressional)
Boosters Club)

1. How long have you been an assistant vice president at the Union First National Bank?

2. Describe your duties as an assistant vice president.

3. What other positions have you held at Union First National Bank? State appropriate dates for each such position.

4. What is your salary as assistant vice president at Union First National Bank?

5. What services did you perform in 1976 in connection with the accounts and certificates of deposit of the Republic Congressional Boosters Club (hereinafter "Boosters") at Union First National Bank?

ANSWER: Through Treasurer, coordinated with Executive Director and employees to provide transfer of funds in accounts in this bank. Upon request, made out and signed checks to

9. Do you perform services for other depositors at Union First National Bank the same as or similar to the services described in your answer to Interrogatory #5 above?

ANSWER: Yes, except I do not keep check books.

10. If the answer to Interrogatory #9 above is yes, state the number of accounts other than Boosters' for which you perform such services.

ANSWER: At least 10.

11. Has Boosters ever been required to maintain a "compensating balance" in order to receive the services you perform for it? If so, describe such requirements.

ANSWER: No.

12. Were customers other than Boosters required to maintain "compensating balances" in 1976 in order to receive services the same as or similar to those set forth in your answer to Interrogatory #5? If so, describe such requirements.

ANSWER: No.

13. Describe the types of customers for which Union First National Bank "customarily" offers services the same as or similar to those set forth in your answer to Interrogatory #5 above.

ANSWER: It provides same banking services for any customer making request for it - individual or business or organization. Union First offers a "personal banker" to any customer having our service, Executive Banking.

14. What are the criteria used by the Union First National Bank to determine which customers are offered services the same as or similar to those set forth in your answer to Interrogatory #5 above?

ANSWER: Charitable, non-profit and civic organizations establishing an advantageous banking relationship.

15. Who usually assigns customers and their accounts to you?

ANSWER: Any account opened at branch is assigned to branch manager or myself.

16. What is the name and position of your immediate supervisor?

ANSWER: Lydia C. Coffeen, Vice President and Branch Manager.

17. How long have you provided services for Boosters' accounts and certificates of deposit at Union First National Bank?

ANSWER: Since November 1972.

18. What constitutes "a good account" as stated on page 1, paragraph 2, of your affidavit dated August 11, 1977, and submitted to the Commission in this matter?

ANSWER: One which is profitable and advantageous to bank or is a part of Bank's civic responsibility to community.

19. Referring to Exhibit 1 attached hereto, did you prepare the cover letter and accompanying FEC Schedule A forms attached hereto? If not, who prepared the letter and forms?

ANSWER: No, I signed it for Colonel Daniel during his absence. Employee of Boosters Club prepared it.

20. Have you had occasion to submit other reports or letters on behalf of Boosters similar to the attached Exhibit 1? If so, describe each such submission by date and type of report.

ANSWER: Yes, but not to Federal Election Commission.

21. Do you prepare receipts for contributors to Boosters? If so, are such receipts mailed by the Union First National Bank?

ANSWER: No.

22. Are the services set forth in your answer to Interrogatory #5 above performed during your normal working hours at Union First National Bank?

ANSWER: Performed during normal business day but as officer have no normal working hours.

23. If you prepared the report in the attached Exhibit 1, from whom did you receive the information contained in the report?

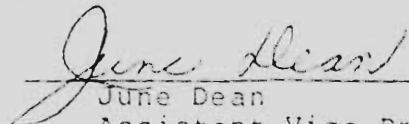
ANSWER: Not applicable.

24. Has the Union First National Bank ever given you written guidelines on the types of services you may provide to customers? If so, attach a copy of said guidelines to your answers to these interrogatories.

ANSWER: See attached Bank Services Handbook.


25. Did you receive written instructions on the type of services you were to perform on behalf of Boosters accounts and certificates of deposit? If so, attach a copy of said instructions to your answers to these interrogatories. If not, from whom did you receive guidance as to the specific services you could perform with respect to accounts and deposits maintained by Boosters?

ANSWER: As outlined in instructions to Charles Daniel dated January 26, 1976, copy attached.



June Dean
Assistant Vice President
Union First National Bank

Subscribed and sworn to before me this 23rd day of December, 1977.



Notary Public, D.C.
My Commission Expires February 28, 1979

REPUBLICAN CONGRESSIONAL BOOSTERS CLUB

~~300 First Street, S.E., Washington, D.C. 20003 (202) 554-5056~~
300 First Street, S.E., Washington, D.C. 20003 (202) 554-5056

January 26, 1976

Honorary Chairman
Vice President Nelson Rockefeller

Chairman
Bob Wilson, M.C.

Co-Chairwomen
Mrs. Flo Atherton
Mrs. John J. Louis
Mrs. Ogden Phipps
Mrs. Clive Runkles

Executive Director
L. Lee Potter
Bebe Bourne, Associate

Executive Committee
Senator Hugh Scott
Senate Minority Leader
Congressman John J. Rhodes
House Minority Leader
Senator Robert P. Griffin
Senate Minority Whip
Congressman Bob Michel
House Minority Whip

Treasurer
Charles D. Daniel
First National Bank
of Wash.

Mr. Charles Daniel, Treasurer
Republican Congressional Boosters Club
Union First National Bank of Washington
Washington, D. C. 20005

Dear Mr. Daniel:

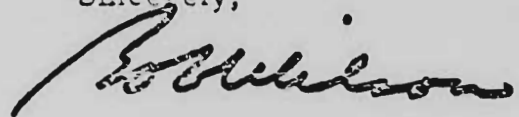
This letter is your authorization and direction to take the following steps in behalf of the Republican Congressional Boosters Club:

- (1) You are appointed Treasurer of the Republican Congressional Boosters Club and authorized to perform all duties attendant thereto.
- (2) You are specifically authorized to sign checks for this organization.
- (3) You are authorized to designate an employee of the Union First National Bank of Washington to sign checks in your absence or when otherwise directed by you.
- (4) You are authorized to pay such bills as are presented to you which are appropriate to the business of the organization.
- (5) You are authorized upon receipt of letter from L. Lee Potter, Executive Director of the Boosters Club, to make disbursements to Republican candidates for Congress.
- (6) You are authorized to appoint an employee of the Union First National Bank of Washington to keep necessary records, make required reports and perform other such duties.

- (7) You are authorized to open an operations account for the Republican Congressional Boosters Club for operation expenses with checks to be signed by I. Lee Potter and Martha Spenger as co-signers.

This letter is to supersede a previous letter of March 20, 1974.

Sincerely,

A handwritten signature in dark ink, appearing to read "Bob Wilson", with a stylized, sweeping flourish extending from the end of the name.

Bob Wilson
National Chairman

7004000000

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Union First National Bank)	MUR 415 (77)
Republican Congressional)	
Boosters Club)	

ANSWERS OF CHARLES DANIEL,
PRESIDENT, UNION FIRST NATIONAL BANK, TO
THE COMMISSION'S INTERROGATORIES

1. State the length of time you have held your present position with the Union First National Bank.

ANSWER: From date of merger of First National and Union Trust, January 1, 1976.

2. What services do you perform on behalf of the Republican Congressional Boosters Club (hereinafter "Boosters") as its treasurer?

ANSWER: Performed duties of treasurer of political committee as required by Federal Election Campaign Laws. In particular, signed checks (on rare occasions), reviewed accounts at Union First National Bank and Arlington Trust Company, and financial reports of the Boosters and forwarded same over my signature to the appropriate authorities.

3. In your capacity as President of Union First National Bank, what services did you perform in 1976 in connection with Boosters' accounts and certificates of deposits?

ANSWER: In addition to what is set forth in #2 above advised Boosters, on rare occasions, on prevailing rates of interest on certificates of deposit and continued to use, as authorized by the Committee, Mrs. Dean as my agent.

4. In 1976, how many hours per week did you spend performing the services described in your answers to Interrogatories #2 and #3?

ANSWER: Ten minutes per month.

5. For how many Boosters' accounts do you have signature authority? Describe each such account by number and purpose.

- ANSWER: Four.
1. Republican Congressional Boosters Club 3-506-991 - Contributors Account. All contributions are deposited to this account and all checks to candidates are drawn from this account.
 2. Boosters Club Interest Account #3-524-159 - Opened and maintained by funds received as interest on savings accounts and certificates of deposit to pay federal income taxes on donations other than cash.
 3. Republican Congressional Booster Club #11-114-563 - Savings Account Under instructions from Mr. Potter opened account to obtain interest at time when certificate of deposit rates were lower than regular interest.
 4. Republican Congressional Boosters Club #11-115-152 - Savings Account Same as #3 above.

6. Who instructs you to issue checks and make deposits or transfers with respect to the Boosters' accounts and certificates of deposit maintained at Union First National Bank? Are such instructions given in writing or orally? If in writing, attach copies to your answers to these interrogatories.

ANSWER: Checks were authorized by Executive Director of Committee in writing. Deposits were made by mail or by employees of Committee. Instructions for issuance of checks from the Boosters were by letter. Sample copy of form letter attached hereto.

7. What services were performed in 1976 by Ms. June Dean, assistant vice president at Union First National Bank, with respect to Boosters' accounts and certificates of deposit at Union First National Bank?

ANSWER: She acted as my agent, as authorized by the Committee, to sign checks and keep checkbooks.

8. When did you assign Ms. Dean to service the Boosters' accounts?

ANSWER: March, 1974

9. Is Boosters required to maintain a "compensating balance" in order to receive the services performed by Ms. Dean or other officers or employees of the Union First National Bank? If so, describe such requirements.

ANSWER: No.

10. Were depositors other than Boosters required to maintain "compensating balances" in 1976 in order to receive services the same as or similar to those services rendered by Ms. Dean with respect to Boosters' accounts and certificates of deposit? If so, describe such requirements.

ANSWER: No.

11. Describe the types of customers for which Union First National Bank "customarily" offers the types of services set forth in your answer to Interrogatory #7 above?

ANSWER: Not customarily offered, but we do have similar charitable, non-profit or civic organization customers in which some of our officers or employees act as treasurers.

12. How many customers in 1976 received services from an employee or officer of the Union First National Bank the same as or similar to those services described in your answer to Interrogatory #7 above?

ANSWER: Approximately nine.

13. In 1976, how many officers and employees of Union First National Bank performed services for customers which were the same as or similar to those services performed by Ms. Dean on behalf of Boosters?

ANSWER: Approximately eight.

14. What criteria are used by Union First National Bank to determine whether a depositor will be offered services the same as or similar to those set forth in your answer to Interrogatory #7 above?

ANSWER: Charitable, non-profit, civic organizations establishing an advantageous banking relationship.

15. Does the Union First National Bank have written guidelines or other published material which describes the services offered to depositors? If so, attach a copy of such guidelines or material to your answers to these interrogatories.

ANSWER: Banking Services Handbook attached hereto.

16. In your absence, what officers or employees of Union First National Bank have authority to perform your duties as Treasurer of Boosters?

ANSWER: Mrs. June Dean

17. Referring to Exhibit 1 attached hereto, did you authorize Ms. Dean to sign the cover letter? Did you authorize Ms. Dean to prepare the report?

ANSWER: Not specifically, but she signed while I was on vacation and under general authorization of Congressman Bob Wilson, Booster Chairman.

18. If Ms. Dean did not prepare the report in attached Exhibit 1, identify the person who prepared said report.

ANSWER: Prepared by employee of Boosters.

19. Did you or other officers or employees of Union First National Bank prepare acknowledgment letters to Boosters' contributors in 1976?

ANSWER: No.

20. Do you sign acknowledgment letters to Boosters' contributors that are prepared by someone other than you or employees of Union First National Bank? If so, identify the person(s) who prepare and submit the letters to you for signature.

ANSWER: No.

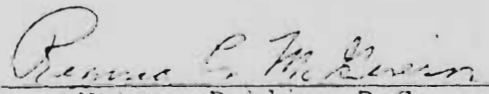
21. Are the services described in answer to interrogatories #2 and #3 performed by you during normal working hours at Union First National Bank? If not, state when such services are performed.

ANSWER: Yes, during business day but as executive officer of bank, I have no "normal" working hours.



Charles Daniel
President
Union First National Bank

Subscribed and sworn to before me this 23rd day
of December, 1977.



Notary Public, D.C.

My Commission Expires February 28, 1978

REPUBLICAN CONGRESSIONAL BOOSTERS CLUB

300 First Street, S.E.

Washington, D.C. 20003 (202) 554-5056

Honorary Chairman
Vice President Nelson Rockefeller

Chairman
Bob Wilson, M.C.

Co-Chairwomen
Mrs. Flo Atherton
Mrs. John J. Louis
Mrs. Ogden Phipps
Mrs. Clive Runnells

Executive Director
I. Lee Potter
Beebe Bourne, Associate

Executive Committee
Senator Hugh Scott
Senate Minority Leader
Congressman John J. Rhodes
House Minority Leader
Senator Robert P. Griffin
Senate Minority Whip
Congressman Bob Michel
House Minority Whip

Treasurer
Charles D. Daniel
Union First National Bank
of Washington
Washington, D.C.

Mr. Charles D. Daniel
Treasurer
Republican Congressional Boosters Club
Union First National Bank
740 - 15th Street, N. W.
Washington, D. C. 20005

Dear Mr. Daniel:

This will request a check be drawn from the National
Republican Congressional Boosters Club account (023-774-4)
to be made payable as follows:

AMOUNT _____

PAYEE _____

TREASURER _____

ADDRESS _____

STATE & DISTRICT _____

DATE _____

Sincerely,

I. Lee Potter
Executive Director

ILP/ms

EXECUTIVE BANKING

DESCRIPTION: Union First offers a package of banking services for the individual whose annual income is \$20,000 or more. The client must apply and be approved for the service and open a checking account with as little as \$100. Services included with Executive Banking are:

1. A personal banker...A bank executive who can handle all the client's banking needs.
2. Monthly financial review...A unique monthly report that summarizes all of the banking relationships which the client designates (except the balances in trust accounts). These include:
 - o Checking Accounts
 - o Statement Savings Accounts
 - o Golden Savings Accounts
 - o Savings Certificates
 - o Consumer Loans
 - o Mortgage Loans
 - o Commercial Loans
 - o Line of Credit Checking Loan Balance
 - o Cash Reserve Available
 - o Investment Management Accounts
 - o Total Market Value
3. Checking with overdraft protection...A convenient source of funds available when the client needs it, without filling out an application, just by writing a check.
4. 24-hour Banking...Every Executive Banking client receives a personal, magnetically encoded card that effectively "opens the bank" seven days a week, 24-hours a day.
5. Preferred loan rates...On unsecured, personal installment loans over \$2,000, Executive Banking clients save 5 percent of the cost of borrowing, when repayments are charged to their checking account.

EXECUTIVE BANKING (Continued)

DESCRIPTION:

6. Clients qualifying for a \$2,000 or more line of credit automatically are eligible for an American Express Gold Card. It is an optional extra since the client must pay an annual fee to American Express (see Executive Banking Plus - Pg. 10.108a).

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapters 22.117 and 26; the New Accounts Handbook, Chapter 14, the Tellers Handbook, Chapter 3.106 and 107; the Consumer Loan Handbook, Chapter 8.

PROSPECTS:

The individual whose income is \$20,000 or more and Gold Card cardholders.

CLIENT BENEFITS:

A personal banker who knows client and his account, backed by a staff of specialists in every area of financial management...Client can handle banking by phone or letter, from across the country, or around the world...Postage paid both ways when banking by mail...Cash reserve protects against emergencies and accidental overdrafts...13 convenient self-service 24-hour banking machines...Client saves with preferred loan rates...Cash reserve costs client nothing unless used...Finance charge lower than that for credit cards and department store accounts...Repayments automatically deducted from checking account...Client may choose to purchase credit life and/or accident and health insurance up to \$10,000 for a maximum of five years.

ADVANTAGES FOR UNION FIRST CLIENTS:

Only bank in town offering service...Prestige of bank...Offices conveniently located throughout the District...Saturday banking at six locations...Convenient walk-up windows at six locations...Easy access to three drive-in banks for clients who work in the District...More self-service 24-hour banking machines than any other bank in the District...Bank pays postage both ways for banking by mail.

PRICING:

Checking account free of service charges with an average balance of \$300 or more. Flat fee of \$3.00 per month if average balance falls below \$300.

EXECUTIVE BANKING (Continued)

PRICING:

The cash reserve costs nothing unless used. Then the FINANCE CHARGE is calculated on the average daily loan balance, for the exact number of days the money is actually in use, at an ANNUAL PERCENTAGE RATE OF 11.5%.

CROSS-SELL SERVICES:

Executive Banking Plus
American Express Gold Card
Golden Savings
Golden Savings Certificates
Certificates of Deposit
Personal Loans
Safe Deposit Box
Trust Services
Purchase and Sale of Securities

BROCHURES AVAILABLE:

Executive Banking (Form M-14)
Terms and Agreements (Form M-13)

HAMILTON AND HAMILTON
UNION FIRST BANK BUILDING
WASHINGTON, D. C. 20005

GEORGE E. HAMILTON SR. 1853-1846

TELEPHONE 202-341-2882

MARYLAND OFFICE
21 W. JEFFERSON STREET
ROCKVILLE, MARYLAND 20850
(301) 340-2681

GEORGE E. HAMILTON
WILLIAM A. GLASGOW
JOHN L. HAMILTON
GEORGE E. HAMILTON, JR.
STEPHEN A. TRIMBLE
RICHARD W. TURNER
NICHOLAS C. WARD
DANIEL V. S. MCEVILLY

January 10, 1977

WILLIAM F. BECKER
OF COURTESY

ALSO MEMBER OF THE BAR

Mrs. Gloria Sulton
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20002

Re: MUR 415(76)

Dear Mrs. Sulton:

Pursuant to your request, I enclose herewith an additional Answer to Interrogatory #20, addressed to Mrs. June Dean, of the Union First National Bank. Mrs. Dean has stated that with some considerable work, she could ascertain the date of each of the reports she filed from January, 1973 to July, 1974. If this detailed information is required, kindly advise.

Sincerely yours,



JLH:cb


ACC 3443

BEFORE THE FEDERAL ELECTION COMMISSION


In the Matter of)
) MUR 415 (77)
Union First National Bank)
Republican Congressional)
Boasters Club)

ADDITIONAL ANSWER OF MS. JUNE DEAN,
ASSISTANT VICE PRESIDENT, UNION
FIRST NATIONAL BANK, TO INTERROGATORY
#20 PROPOUNDED BY THE FEDERAL ELECTION
COMMISSION

Further answering this Interrogatory, to the best of my knowledge, I prepared the report, "Report of Receipts and Expenditures for a Political Committee," and attachments, from January, 1973 through July, 1974. I believe there were a total of seventeen reports, and these were filed with the Office of the Clerk, U. S. House of Representatives and with the Secretary of the Senate.


June Dean
Assistant Vice President
Union First National Bank

Subscribed and sworn to before me this 10th day
of August 1973.


Notary Public, D.C.

my commission expires 4-30-82

MUR 415 *SUTTON*

PS Form 3811, Apr. 1977

1. SENDER (Complete items)
Add your address in the RETURN TO space on reverse

The following service is requested (check one):
☒ Show to whom and date delivered
 Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
 Show to whom and date delivered
☐ RESTRICTED DELIVERY
 Show to whom, date, and address of delivery &
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
John R. Hamilton, Esq.
Union First Bank Bldg
Washington, DC 20005

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
944/18

(Always obtain signature of addressee or agent)
 I have received the article described above
 SIGNATURE *C. Aparicio* Address _____ Authorized agent _____

4. DATE OF DELIVERY *JAN 12*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE _____ CLERK'S INITIALS _____

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, DC 20005

January 11, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Hamilton, Esquire
Hamilton & Hamilton
Union First Bank Building
Washington, DC 20005

Re: MUR 415(77)

Dear Mr. Hamilton:

This letter confirms your telephone conversation on January 5, 1978, with Mrs. Sulton of my staff in which you agreed to prepare a more complete response to question 20 of the Commission's interrogatories to Ms. June Dean in the above referenced matter. We will expect to receive that response no later than January 15, 1978.

If you have any questions, please contact Mrs. Sulton on 523-4057. Your cooperation is appreciated.

Sincerely yours,

A handwritten signature in cursive script, which appears to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Hamilton, Esquire
Hamilton & Hamilton
Union First Bank Building
Washington, DC 20005

Re: MUR 415(77)

Dear Mr. Hamilton:

This letter confirms your telephone conversation on January 5, 1978, with Mrs. Sulton of my staff in which you agreed to prepare a more complete response to question 20 of the Commission's interrogatories to Ms. June Dean in the above referenced matter. We will expect to receive that response no later than January 15, 1978.

If you have any questions, please contact Mrs. Sulton on 527-4057. Your cooperation is appreciated.

Sincerely yours,

William C. Oldaker
General Counsel

78040033903

1-9-78

HAMILTON AND HAMILTON
UNION FIRST BANK BUILDING
WASHINGTON, D. C. 20005

GEORGE C. HAMILTON SR. 1953, 1946

TELEPHONE 202-347-2882

MARYLAND OFFICE
21 W. JEFFERSON STREET
ROCKVILLE, MARYLAND 20850
301-340-2591

GEORGE E. HAMILTON
WILLIAM A. GLASGOW

JOHN L. HAMILTON

GEORGE E. HAMILTON

STEPHEN A. TRIMBLE

RICHARD W. TURNER

NICHOLAS D. WARD

DAVID L. S. MEECE

1000 NEW YORK AVENUE, N.W.

January 10, 1977

WILLIAM F. BECKER
OF COUNSEL

Mrs. Gloria Sulton
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20002

Re: MUR 415(76)

Dear Mrs. Sulton:

Pursuant to your request, I enclose herewith an additional Answer to Interrogatory #20, addressed to Mrs. June Dean, of the Union First National Bank. Mrs. Dean has stated that with some considerable work, she could ascertain the date of each of the reports she filed from January, 1973 to July, 1974. If this detailed information is required, kindly advise.

Sincerely yours,



JLH:cb

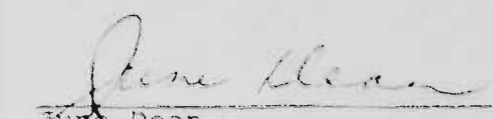
ACC 2442

BEFORE THE FEDERAL ELECTION COMMISSION


In the Matter of)
) MUR 415 (77)
Union First National Bank)
Republican Congressional)
Boosters Club)

ADDITIONAL ANSWER OF MS. JUNE DEAN,
ASSISTANT VICE PRESIDENT, UNION
FIRST NATIONAL BANK, TO INTERROGATORY
#20 PROPOUNDED BY THE FEDERAL ELECTION
COMMISSION

Further answering this Interrogatory, to the best of my knowledge, I prepared the report, "Report of Receipts and Expenditures for a Political Committee," and attachments, from January, 1973 through July, 1974. I believe there were a total of seventeen reports, and these were filed with the Office of the Clerk, U. S. House of Representatives and with the Secretary of the Senate.


June Dean
Assistant Vice President
Union First National Bank

Subscribed and sworn to before me this 10th day
of January 1978.


Notary Public, D.C.

FEDERAL ELECTION COMMISSION

CORRESPONDENCE CONTROL SLIP

Do Not Separate From Document

For Division Use

MCC 2442

Suspense No.

80002

Name and Address of Sender

JOHN DEAN
NATIONAL REFORM PARTY
WASHINGTON, D.C.

Subject of Correspondence

Date Received

Suspense Date

Referred to

Action (Optional)

1.

2.

3.

4.

5.

Answer Date

NAN

File Designation

4300

Special Instructions:

HAMILTON AND HAMILTON

UNION FIRST BANK BUILDING
1111 WASHINGTON CIRCLE
WASHINGTON D.C. 20002

46:01-41-1000-CL
Mrs. Gloria Sulton
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20002

December 30, 1977

MEMORANDUM TO: Marge Emmons
FROM: Jeff Bowman
SUBJECT: MUR 306(76) and MUR 415(77) Team#3
Staff member-Sulton

Please have the attached Interim Status Report
on MUR 306(76) and MUR 415(77) distributed to the
Commission and placed on the Compliance Agenda for
the Commission Meeting of January 4, 1978.

Thank you.

78040033909

BEFORE THE FEDERAL ELECTION COMMISSION
December 21, 1977

In the Matter of)
)
Union First National Bank)
Charles Daniel, President)
of Union First National) MUR 415(77)
Bank)
)
and)
)
Republican Congressional)
Boosters Club)

INTERIM STATUS REPORT

I. Previous Commission Action

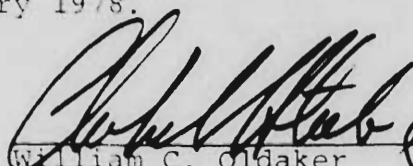
73940011000

This matter was initiated based upon findings by the Audit Division in the course of its examination of the books and records of the Republican Congressional Boosters Club (hereinafter "Boosters"). The audit report indicated that Ms. June Dean, an employee of the Union First National Bank (hereinafter "Bank") performed certain services for Boosters' accounts at the Bank which might be contributions prohibited under 2 U.S.C. §441b. Respondent Daniel is treasurer of Boosters and President of the Bank. He appointed Ms. Dean to perform certain services on behalf of Boosters.

On July 28, 1977, the Commission found reason to believe that the three respondents had committed violations of 2 U.S.C. §441b. The parties were notified on August 2, 1977 and responses were received from the Bank through an affidavit signed by Ms. June Dean and from Boosters through an affidavit signed by I. Lee Potter.

On October 19, 1977, the Commission authorized the issuance of an Order to answer interrogatories under 2 U.S.C. §437d(a)(1) directed to Charles Daniel, June Dean and I. Lee Potter. On December 9, 1977, the Interrogatories were served on the parties through their counsel. We anticipate receiving answer to the Interrogatories by the end of December 1977, and we expect that a General Counsel's Report will be presented to the Commission in early January 1978.

30 December 1977
Date


William C. Oldaker
General Counsel

90C 9356
NRN

HAMILTON AND HAMILTON
UNION FIRST BANK BUILDING
WASHINGTON D C 20005

GEORGE E. HAMILTON OR 1853-1948

TELEPHONE 302-347-2882

GEORGE E. HAMILTON
WILLIAM A. GLASGOW

JOHN L. HAMILTON
GEORGE E. HAMILTON III
JEROME S. TRIMBLE
NEEDHAM W. TURNER
NANCY M. TURNER
VANCE L. TURNER

MARYLAND OFFICE
27 W. JEFFERSON STREET
ROCKVILLE, MARYLAND 20850
(301) 340-2561

December 29, 1977

WILLIAM F. BECKER
OF COUNSEL

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20006

Re: MUR 415 (77)

Dear Mr. Oldaker:

I enclose herewith the Answers of Colonel Charles Daniel, President of the Union First National Bank, and Mrs. June Dean, Assistant Vice President of the Bank. The interrogatories were received December 13, 1977 by my partner, Mr. Glasgow, and are forwarded to you today pursuant to our conversation with Mrs. Gloria R. Sulton as reported to you in my letter of December 19, 1977.

I am advised that Colonel Daniel is no longer treasurer of the Republican Congressional Boosters Club, having resigned said position on November 15, 1977. From my discussions with Colonel Daniel and Mrs. Dean, I am convinced that Union First performed only ordinary banking functions for the Boosters Club and that there was no intent to violate nor was there any infraction of the Federal Election Campaign Laws by either. If either you or Mrs. Sulton have any questions that have not been answered, please contact me. If necessary, I will be very happy to sit down and discuss the matters in person with either of you.

Sincerely yours,

John L. Hamilton

JLH:cb

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 415(77)
Union First National Bank)
Republican Congressional)
Boosters Club)

ANSWER OF MS. JUNE DEAN, ASSISTANT
VICE PRESIDENT, UNION FIRST NATIONAL
BANK, TO THE COMMISSION'S INTERROGATORIES

1. How long have you been an assistant vice president at the Union First National Bank?

ANSWER: Since November 1966.

2. Describe your duties as an assistant vice president.

ANSWER: To back up Branch Manager, to insure smooth running of branch and good service to the customer and other such duties as may be assigned me from time to time.

3. What other positions have you held at Union First National Bank? State appropriate dates for each such position.

ANSWER: Installment loan employee - April 1966 to November 1966. Installment loan officer - November 1966 to February 1970. Assistant to the Branch Manager and the Assistant Branch Manager - February 1970 to present.

4. What is your salary as assistant vice president at Union First National Bank?

ANSWER: \$15,667.

5. What services did you perform in 1976 in connection with the accounts and certificates of deposit of the Republican Congressional Boosters Club (hereinafter "Boosters") at Union First National Bank?

ANSWER: Through Treasurer, coordinated with Executive Director and employees to provide transfer of funds in accounts in this bank. Upon request, made out and signed checks to

candidates and sent them to Boosters Club. Opened accounts as requested and transferred funds as requested. Recorded deposits and checks in checkbook. Verified balance with Boosters at month end.

6. In 1976, approximately how many hours per week did you spend performing the services described in your answer to Interrogatory #5 above?

ANSWER: Forty-five minutes at most, many weeks, no time at all.

7. For how many Boosters' accounts do you have signature authority? Please describe each such account by name, number and purpose.

ANSWER: Four (4).

(A) Republic Congressional Boosters Club - #3-506-991. Contributors accounts -- all contributions are deposited to this account and all checks to candidates are drawn from this account.

(B) Boosters Club Interest Account - Checking #3-524-159. Opened and maintained by funds received as interest on savings accounts and certificates of deposit to pay federal income taxes on donations other than cash.

(C) Republican Congressional Booster Club - Savings Account #11-114-563. Under instructions from Mr. Potter opened account to obtain interest at time when certificate of deposit rates were lower than regular interest.

(D) Republic Congressional Boosters Club - Savings Account #11-115-152. Same as above.

8. Who instructs you to issue checks and make deposits or transfers with respect to the Boosters' accounts and certificates of deposits at Union First National Bank?

ANSWER: Mr. Potter instructs Colonel Daniel by letter which is passed on to me, but I do not make deposits.

9. Do you perform services for other depositors at Union First National Bank the same as or similar to the services described in your answer to Interrogatory #5 above?

ANSWER: Yes, except I do not keep check books.

10. If the answer to Interrogatory #9 above is yes, state the number of accounts other than Boosters' for which you perform such services.

ANSWER: At least 10.

11. Has Boosters ever been required to maintain a "compensating balance" in order to receive the services you perform for it? If so, describe such requirements.

ANSWER: No.

12. Were customers other than Boosters required to maintain "compensating balances" in 1976 in order to receive services the same as or similar to those set forth in your answer to Interrogatory #5? If so, describe such requirements.

ANSWER: No.

13. Describe the types of customers for which Union First National Bank "customarily" offers services the same as or similar to those set forth in your answer to Interrogatory #5 above.

ANSWER: It provides same banking services for any customer making request for it - individual or business or organization. Union First offers a "personal banker" to any customer having our service, Executive Banking.

14. What are the criteria used by the Union First National Bank to determine which customers are offered services the same as or similar to those set forth in your answer to Interrogatory #5 above?

ANSWER: Charitable, non-profit and civic organizations establishing an advantageous banking relationship.

15. Who usually assigns customers and their accounts to you?

ANSWER: Any account opened at branch is assigned to branch manager or myself.

16. What is the name and position of your immediate supervisor?

ANSWER: Lydia C. Coffeen, Vice President and Branch Manager.

17. How long have you provided services for Boosters' accounts and certificates of deposit at Union First National Bank?

ANSWER: Since November 1972.

18. What constitutes "a good account" as stated on page 1, paragraph 2, of your affidavit dated August 11, 1977, and submitted to the Commission in this matter?

ANSWER: One which is profitable and advantageous to bank or is a part of Bank's civic responsibility to community.

19. Referring to Exhibit 1 attached hereto, did you prepare the cover letter and accompanying FEC Schedule A forms attached hereto? If not, who prepared the letter and forms?

ANSWER: No, I signed it for Colonel Daniel during his absence. Employee of Boosters Club prepared it.

20. Have you had occasion to submit other reports or letters on behalf of Boosters similar to the attached Exhibit 1? If so, describe each such submission by date and type of report.

ANSWER: Yes, but not to Federal Election Commission.

21. Do you prepare receipts for contributors to Boosters? If so, are such receipts mailed by the Union First National Bank?

ANSWER: No.

22. Are the services set forth in your answer to Interrogatory #5 above performed during your normal working hours at Union First National Bank?

ANSWER: Performed during normal business day but as officer have no normal working hours.

23. If you prepared the report in the attached Exhibit 1, from whom did you receive the information contained in the report?

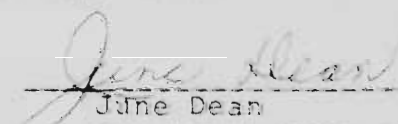
ANSWER: Not applicable.

24. Has the Union First National Bank ever given you written guidelines on the types of services you may provide to customers? If so, attach a copy of said guidelines to your answers to these interrogatories.

ANSWER: See attached Bank Services Handbook.


25. Did you receive written instructions on the type of services you were to perform on behalf of Boosters accounts and certificates of deposit? If so, attach a copy of said instructions to your answers to these interrogatories. If not, from whom did you receive guidance as to the specific services you could perform with respect to accounts and deposits maintained by Boosters?

ANSWER: As outlined in instructions to Charles Daniel dated January 26, 1976, copy attached.



June Dean
Assistant Vice President
Union First National Bank

Subscribed and sworn to before me this 23rd
day of December, 1977.



Notary Public, D.C.

My Commission Expires February 28, 1979

REPUBLICAN CONGRESSIONAL BOOSTERS CLUB

~~300 NORTH FIRST STREET, S.E., WASHINGTON, D.C. 20003 (202) 554-5056~~
300 First Street, S.E., Washington, D. C. 20003 (202) 554-5056

January 26, 1976

Honorary Chairman
Vice President Nelson Rockefeller

Chairman
Bob Wilson, M.C.

Co-Chairwomen
Mrs. Flo Atherton
Mrs. John J. Louis
Mrs. Ogden Phipps
Mrs. Clive Runnells

Executive Director
I. Lee Potter
Beebe Bourne, Associate

Executive Committee
Senator Hugh Scott
Senate Minority Leader
Congressman John J. Rhodes
House Minority Leader
Senator Robert P. Griffin
Senate Minority Whip
Congressman Bob Michel
House Minority Whip

Treasurer
Charles D. Daniel
First National Bank
of Wash.

Mr. Charles Daniel, Treasurer
Republican Congressional Boosters Club
Union First National Bank of Washington
Washington, D. C. 20005

Dear Mr. Daniel:

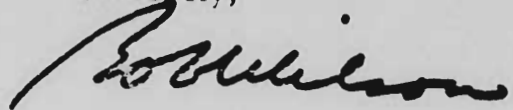
This letter is your authorization and direction to take the following steps in behalf of the Republican Congressional Boosters Club:

- (1) You are appointed Treasurer of the Republican Congressional Boosters Club and authorized to perform all duties attendant thereto.
- (2) You are specifically authorized to sign checks for this organization.
- (3) You are authorized to designate an employee of the Union First National Bank of Washington to sign checks in your absence or when otherwise directed by you.
- (4) You are authorized to pay such bills as are presented to you which are appropriate to the business of the organization.
- (5) You are authorized upon receipt of letter from I. Lee Potter, Executive Director of the Boosters Club, to make disbursements to Republican candidates for Congress.
- (6) You are authorized to appoint an employee of the Union First National Bank of Washington to keep necessary records, make required reports and perform other such duties.

- (7) You are authorized to open an operations account for the Republican Congressional Boosters Club for operation expenses with checks to be signed by I. Lee Potter and Martha Spenger as co-signers.

This letter is to supersede a previous letter of March 20, 1974.

Sincerely,

A handwritten signature in cursive script, appearing to read "Bob Wilson".

Bob Wilson
National Chairman

70041013913

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Union First National Bank)	MUR 415 (77)
Republican Congressional)	
Boosters Club)	

ANSWERS OF CHARLES DANIEL,
PRESIDENT, UNION FIRST NATIONAL BANK, TO
THE COMMISSION'S INTERROGATORIES

1. State the length of time you have held your present position with the Union First National Bank.

ANSWER: From date of merger of First National and Union Trust, January 1, 1976.

2. What services do you perform on behalf of the Republican Congressional Boosters Club (hereinafter "Boosters") as its treasurer?

ANSWER: Performed duties of treasurer of political committee as required by Federal Election Campaign Laws. In particular, signed checks (on rare occasions), reviewed accounts at Union First National Bank and Arlington Trust Company, and financial reports of the Boosters and forwarded same over my signature to the appropriate authorities.

3. In your capacity as President of Union First National Bank, what services did you perform in 1976 in connection with Boosters' accounts and certificates of deposits?

ANSWER: In addition to what is set forth in #2 above advised Boosters, on rare occasions, on prevailing rates of interest on certificates of deposit and continued to use, as authorized by the Committee, Mrs. Dean as my agent.

4. In 1976, how many hours per week did you spend performing the services described in your answers to Interrogatories #2 and #3?

ANSWER: Ten minutes per month.

5. For how many Boosters' accounts do you have signature authority? Describe each such account by number and purpose.

- ANSWER: Four.
1. Republican Congressional Boosters Club 3-506-991 - Contributors Account. All contributions are deposited to this account and all checks to candidates are drawn from this account.
 2. Boosters Club Interest Account #3-524-159 - Opened and maintained by funds received as interest on savings accounts and certificates of deposit to pay federal income taxes on donations other than cash.
 3. Republican Congressional Booster Club #11-114-563 - Savings Account Under instructions from Mr. Potter opened account to obtain interest at time when certificate of deposit rates were lower than regular interest.
 4. Republican Congressional Boosters Club #11-115-152 - Savings Account Same as #3 above.

6. Who instructs you to issue checks and make deposits or transfers with respect to the Boosters' accounts and certificates of deposit maintained at Union First National Bank? Are such instructions given in writing or orally? If in writing, attach copies to your answers to these interrogatories.

ANSWER: Checks were authorized by Executive Director of Committee in writing. Deposits were made by mail or by employees of Committee. Instructions for issuance of checks from the Boosters were by letter. Sample copy of form letter attached hereto.

7. What services were performed in 1976 by Ms. June Dean, assistant vice president at Union First National Bank, with respect to Boosters' accounts and certificates of deposit at Union First National Bank?

ANSWER: She acted as my agent, as authorized by the Committee, to sign checks and keep checkbooks.

8. When did you assign Ms. Dean to service the Boosters' accounts?

ANSWER: March, 1974

9. Is Boosters required to maintain a "compensating balance" in order to receive the services performed by Ms. Dean or other officers or employees of the Union First National Bank? If so, describe such requirements.

ANSWER: No.

10. Were depositors other than Boosters required to maintain "compensating balances" in 1976 in order to receive services the same as or similar to those services rendered by Ms. Dean with respect to Boosters' accounts and certificates of deposit? If so, describe such requirements.

ANSWER: No.

11. Describe the types of customers for which Union First National Bank "customarily" offers the types of services set forth in your answer to Interrogatory #7 above?

ANSWER: Not customarily offered, but we do have similar charitable, non-profit or civic organization customers in which some of our officers or employees act as treasurers.

12. How many customers in 1976 received services from an employee or officer of the Union First National Bank the same as or similar to those services described in your answer to Interrogatory #7 above?

ANSWER: Approximately nine.

13. In 1976, how many officers and employees of Union First National Bank performed services for customers which were the same as or similar to those services performed by Ms. Dean on behalf of Boosters?

ANSWER: Approximately eight.

14. What criteria are used by Union First National Bank to determine whether a depositor will be offered services the same as or similar to those set forth in your answer to Interrogatory #7 above?

ANSWER: Charitable, non-profit, civic organizations establishing an advantageous banking relationship.

15. Does the Union First National Bank have written guidelines or other published material which describes the services offered to depositors? If so, attach a copy of such guidelines or material to your answers to these interrogatories.

ANSWER: Banking Services Handbook attached hereto.

16. In your absence, what officers or employees of Union First National Bank have authority to perform your duties as Treasurer of Boosters?

ANSWER: Mrs. June Dean

17. Referring to Exhibit 1 attached hereto, did you authorize Ms. Dean to sign the cover letter? Did you authorize Ms. Dean to prepare the report?

ANSWER: Not specifically, but she signed while I was on vacation and under general authorization of Congressman Bob Wilson, Booster Chairman.

18. If Ms. Dean did not prepare the report in attached Exhibit 1, identify the person who prepared said report.

ANSWER: Prepared by employee of Boosters.

19. Did you or other officers or employees of Union First National Bank prepare acknowledgment letters to Boosters' contributors in 1976?

ANSWER: No.

20. Do you sign acknowledgment letters to Boosters' contributors that are prepared by someone other than you or employees of Union First National Bank? If so, identify the person(s) who prepare and submit the letters to you for signature.

ANSWER: No.

21. Are the services described in answer to interrogatories #2 and #3 performed by you during normal working hours at Union First National Bank? If not, state when such services are performed.

ANSWER: Yes, during business day but as executive officer of bank, I have no "normal" working hours.



Charles Daniel
President
Union First National Bank

Subscribed and sworn to before me this 23rd day
of December, 1977.



Notary Public, D.C.

My Commission Expires February 28, 1978

REPUBLICAN CONGRESSIONAL BOOSTERS CLUB

300 First Street, S.E.

Washington, D.C. 20003 (202) 554-5056

Honorary Chairman

Vice President Nelson Rockefeller

Chairman

Bob Wilson, M.C.

Co-Chairwomen

Mrs. Flo Atherton

Mrs. John J. Louis

Mrs. Ogden Phipps

Mrs. Clive Runnells

Executive Director

I. Lee Potter

Beebe Bourne, Associate

Executive Committee

Senator Hugh Scott

Senate Minority Leader

Congressman John J. Rhodes

House Minority Leader

Senator Robert P. Griffin

Senate Minority Whip

Congressman Bob Michel

House Minority Whip

Treasurer

Charles D. Daniel

Union First National Bank

of Washington

Washington, D.C.

Mr. Charles D. Daniel

Treasurer

Republican Congressional Boosters Club

Union First National Bank

740 - 15th Street, N. W.

Washington, D. C. 20005

Dear Mr. Daniel:

This will request a check be drawn from the National
Republican Congressional Boosters Club account (023-774-4)
to be made payable as follows:

AMOUNT _____

PAYEE _____

TREASURER _____

ADDRESS _____

STATE & DISTRICT _____

DATE _____

Sincerely,

I. Lee Potter

Executive Director

ILP/ms

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CHECKING ACCOUNTS, REGULAR - PERSONAL

DESCRIPTION:

Union First offers checking services for individuals. Accounts may be opened with a minimum deposit of \$100. The client receives a monthly statement, along with his cancelled checks and internal or transfer debits. Types of regular checking accounts include individual or joint tenants with right of survivorship.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 23, and the New Accounts Handbook, Chapter 1.

PROSPECTS:

Individuals

CLIENT BENEFITS:

Facilitates payments and transfer of funds throughout the world...Eases record keeping and budgeting by providing an accounting record of transactions...Provides legal proof of payments...Facilitates access to the entire scope of bank services...Cash guarded from loss or theft...Free of service charges with a \$300 or more average balance...Flat fee of \$3.00 per month with an average balance less than \$300...Checks styled to client specifications...Automatic deposit of payroll and Social Security checks...F.D.I.C. protection.

ADVANTAGES FOR UNION FIRST CLIENTS:

Free of service charges to senior citizens over 60 years of age...Fully personalized checks with checkbook covers are available at minimal cost...No service charge with \$300 or more average balance...Offices conveniently located throughout the District...Saturday banking at six locations...Easy access to three drive-in banks for clients who work in the District...More self-service 24-hour banking machines than any other bank in the District...Client may bank by mail...Client may open separate checking account for each specific need, e.g., household account, capital account, special account, etc...Prestige of bank.

PRICING:

Free of service charges with an average balance of \$300 or more. Flat fee of \$3.00 per month if average balance falls

CHECKING ACCOUNTS, SPECIAL - PERSONAL

DESCRIPTION: Union First offers checking services for individuals who write a limited number of checks. Accounts may be opened with a minimum deposit of \$100. The client receives a monthly statement along with his cancelled checks and internal or transfer debits. Types of special checking accounts include individual or joint tenants with right of survivorship.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 23 and the New Accounts Handbook, Chapter 1.

PROSPECTS: Individuals who write a limited number of checks.

CLIENT BENEFITS: Facilitates payments and transfer of funds throughout the world...Eases record keeping and budgeting by providing an accounting record of transactions...Provides legal proof of payments...Facilitates access to the entire scope of bank services...Cash guarded from loss or theft...Client pays for only the number of checks paid...No minimum balance required...Checks styled to client specifications...Automatic deposit of payroll and Social Security checks...F.D.I.C. protection.

ADVANTAGES FOR UNION FIRST CLIENTS:

Fully personalized checks with checkbook covers are available at minimal cost...Pay only for the number of checks paid, with no minimum balance required...Offices conveniently located throughout the District...Saturday banking at six locations...Convenient walk-up windows at six locations...Easy access to three drive-in banks for clients who work in the District...More self-service 24-hour banking machines than any other bank in the District...Client may bank by mail...Prestige of bank.

PRICING: \$1.00 per month, plus 10¢ per check paid.

CROSS-SELL SERVICES: Statement Savings
Golden Savings

STATEMENT SAVINGS

DESCRIPTION: Union First offers this savings program to meet the short-range savings goals of its clients. The account may be opened with \$100 minimum deposit (\$5 for minor children of clients or at officer's discretion). Deposits earn 5 percent interest daily, the maximum amount a bank can pay on this type of account. Interest is compounded quarterly and credited to the account as of the close of business the last day of March, June, September, and December. Funds may be withdrawn without an interest penalty at any time.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 24, and the New Accounts Handbook, Chapter 8.

PROSPECTS: Individuals with short-range goals, small savers, young savers who are just beginning a savings program, organizations, and profit-making businesses (up to \$150,000).

CLIENT BENEFITS: F.D.I.C. protection...Client receives a quarterly statement showing deposits, withdrawals and interest earned...Interest credited to the account at the end of each calendar quarter for greater fund availability...Improve profits by having funds in an interest-bearing account...Automatic transfer from checking account can be arranged to facilitate saving...May be used as collateral on loans...Automatic deposit of Social Security checks...Convenience of banking by mail.

ADVANTAGES FOR UNION FIRST CLIENTS:

Various ways of handling savings transactions: by mail with bank-by-mail kits; at offices conveniently located throughout the District; through three drive-in banks, six walk-up windows, and 13 self-service 24-hour banking machines...Savings accounts may be used as collateral on loans...Prestige of bank.

PRICING: \$1.00 charge for each withdrawal in excess of four during a quarter, if average balance for quarter is less than \$500.

\$1.00 a month service charge, if average balance for quarter is less than \$100.

GOLDEN SAVINGS

DESCRIPTION:

Union First offers Golden Savings to its clients with intermediate-range goals. The account may be opened with \$1,000 minimum deposit. Deposits earn 5-1/2 percent interest daily. Interest is compounded quarterly and credited to the account as of the close of business the last day of March, June, September, and December. Withdrawals may be made at any time, subject to penalty for early withdrawal. Withdrawals may be made without an interest penalty during the first ten days of each calendar quarter, providing money withdrawn has been on deposit at least 90 days, or at any time after 90 days' prior written notice. Penalty for early withdrawal: If money withdrawn has been on deposit for three months or less, all interest on the money is forfeited. If money withdrawn has been on deposit for more than three months, all interest since the last day of the previous calendar quarter on the money withdrawn is forfeited.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 24, and the New Accounts Handbook, Chapter 9.

PROSPECTS:

Individuals with intermediate-range goals and non-profit organizations.

CLIENT BENEFITS:

F.D.I.C. protection...Client receives a quarterly statement showing deposits, withdrawals and interest earned...Interest credited to the account at the end of each calendar quarter for greater fund availability...Improve profits by having funds in an interest-bearing account...Higher interest rate paid than with Statement Savings...Automatic transfer from checking account can be arranged to facilitate savings...May be used as collateral on loans...Automatic deposit of Social Security checks...Convenience of banking by mail.

ADVANTAGES FOR UNION FIRST CLIENTS:

Various ways of handling savings transactions: by mail with bank-by-mail kits; at offices conveniently located throughout the District; through three drive-in banks, six walk-up win-

GOLDEN SAVINGS CERTIFICATES

DESCRIPTION:

Union First issues non-negotiable savings certificates to individuals, businesses, and organizations. Certificates are issued for amounts of \$1,000 or more in maturities of 30 days to six years, subject to management policy as set from time to time. Interest rates vary with the length of time the money is invested.

Presently, Union First is paying the maximum interest rates allowed on Golden Savings Certificates:

30 to 89 days	5 percent
90 days or more but less than 1 year	5-1/2 percent
1 year or more but less than 30 months	6 percent
30 months or more but less than 4 years	6-1/2 percent
4 years or more but less than 6 years	7-1/4 percent
6 years only	7-1/2 percent

Certificates are automatically renewable on maturity. Interest, payable at maturity on certificates of less than one year and at the end of each calendar quarter on certificates of one year or more, is paid by crediting the certificate and allowing the interest to compound, crediting a savings account, crediting a checking account, or a Cashier's Check payable to the client.

Savings certificates may be redeemed at any time without notice of any kind to the bank. When the certificate is redeemed before maturity, interest on the money withdrawn will be paid at a rate of 5 percent for the time the money was in the bank, or since the last maturity date, if the certificate has been renewed, minus three months of that interest. If the money has been on deposit for three months or less, all interest will be forfeited.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 24, and the New Accounts Handbook, Chapter 11.

CERTIFICATES OF DEPOSIT

DESCRIPTION:

Union First issues certificates of deposit to businesses, as well as to individuals and non-profit organizations. These are negotiable time instruments of \$100,000 or more, which are issued for 30 or more days and bear simple interest at various rates set by management, payable at maturity. They may be negotiated or sold at any time. Penalty for early withdrawal: If money on deposit three months or less, all interest is forfeited. If money on deposit more than three months, 5 percent interest is paid on the money for the time it has been in the bank minus three months of that interest.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 24, and the New Accounts Handbook, Chapter 11.

PROSPECTS:

More substantial individual savers, businesses, and organizations.

CLIENT BENEFITS:

Tight control of funds through flexible maturity dates of 30 days or longer with higher interest rates...May be negotiated or sold at any time to insure better management of funds...May be used as collateral for a Union First loan...Client receives an annual statement of interest earned...F.D.I.C. protection.

ADVANTAGES FOR UNION FIRST CLIENTS:

Various maturities for client flexibility...Client receives an annual statement of interest earned...Certificates may be used as collateral for a Union First loan...Offices conveniently located throughout the District...Prestige of bank.

CROSS-SELL SERVICES:

Checking Account
Statement Savings
Golden Savings
Golden Savings Certificates
International Banking Services
Commercial Loans

EXECUTIVE BANKING

DESCRIPTION: Union First offers a package of banking services for the individual whose annual income is \$20,000 or more. The client must apply and be approved for the service and open a checking account with as little as \$100. Services included with Executive Banking are:

1. A personal banker...A bank executive who can handle all the client's banking needs.
2. Monthly financial review...A unique monthly report that summarizes all of the banking relationships which the client designates (except the balances in trust accounts). These include:
 - o Checking Accounts
 - o Statement Savings Accounts
 - o Golden Savings Accounts
 - o Savings Certificates
 - o Consumer Loans
 - o Mortgage Loans
 - o Commercial Loans
 - o Line of Credit Checking Loan Balance
 - o Cash Reserve Available
 - o Investment Management Accounts
 - o Total Market Value
3. Checking with overdraft protection...A convenient source of funds available when the client needs it, without filling out an application, just by writing a check.
4. 24-hour Banking...Every Executive Banking client receives a personal, magnetically encoded card that effectively "opens the bank" seven days a week, 24-hours a day.
5. Preferred loan rates...On unsecured, personal installment loans over \$2,000, Executive Banking clients save 5 percent of the cost of borrowing, when repayments are charged to their checking account.

SERVICE INFORMATION CONTACTS

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CHECKING ACCOUNTS, REGULAR - PERSONAL

DESCRIPTION: Union First offers checking services for individuals. Accounts may be opened with a minimum deposit of \$100. The client receives a monthly statement, along with his cancelled checks and internal or transfer debits. Types of regular checking accounts include individual or joint tenants with right of survivorship.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 23, and the New Accounts Handbook, Chapter 1.

PROSPECTS: Individuals

CLIENT BENEFITS: Facilitates payments and transfer of funds throughout the world...Eases record keeping and budgeting by providing an accounting record of transactions...Provides legal proof of payments...Facilitates access to the entire scope of bank services...Cash guarded from loss or theft...Free of service charges with a \$300 or more average balance...Flat fee of \$3.00 per month with an average balance less than \$300...Checks styled to client specifications...Automatic deposit of payroll and Social Security checks...F.D.I.C. protection.

ADVANTAGES FOR UNION FIRST CLIENTS: Free of service charges to senior citizens over 60 years of age...Fully personalized checks with checkbook covers are available at minimal cost...No service charge with \$300 or more average balance...Offices conveniently located throughout the District...Saturday banking at six locations...Easy access to three drive-in banks for clients who work in the District...More self-service 24-hour banking machines than any other bank in the District...Client may bank by mail...Client may open separate checking account for each specific need, e.g., household account, capital account, special account, etc...Prestige of bank.

PRICING: Free of service charges with an average balance of \$300 or more. Flat fee of \$3.00 per month if average balance falls

CHECKING ACCOUNTS, REGULAR - PERSONAL (Continued)

PRICING: below \$300. Checking accounts are offered free of service charges to senior citizens over 60 years of age.

CROSS-SELL SERVICES:

Statement Savings
Golden Savings
Automatic Savings (Pay Yourself First)
Automatic Payments
Golden Savings Certificates
Certificates of Deposit
Executive Banking
American Express Gold Card
Personal Loans
Safe Deposit Box
24-hour Banking

BROCHURES AVAILABLE:

Personal Checking Accounts (Form M-11)
Terms and Conditions (Form M-13)

CHECKING ACCOUNTS, SPECIAL - PERSONAL

DESCRIPTION: Union First offers checking services for individuals who write a limited number of checks. Accounts may be opened with a minimum deposit of \$100. The client receives a monthly statement along with his cancelled checks and internal or transfer debits. Types of special checking accounts include individual or joint tenants with right of survivorship.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 23 and the New Accounts Handbook, Chapter 1.

PROSPECTS: Individuals who write a limited number of checks.

CLIENT BENEFITS: Facilitates payments and transfer of funds throughout the world...Eases record keeping and budgeting by providing an accounting record of transactions...Provides legal proof of payments...Facilitates access to the entire scope of bank services...Cash guarded from loss or theft...Client pays for only the number of checks paid...No minimum balance required...Checks styled to client specifications...Automatic deposit of payroll and Social Security checks...F.D.I.C. protection.

ADVANTAGES FOR UNION FIRST CLIENTS:

Fully personalized checks with checkbook covers are available at minimal cost...Pay only for the number of checks paid, with no minimum balance required...Offices conveniently located throughout the District...Saturday banking at six locations...Convenient walk-up windows at six locations...Easy access to three drive-in banks for clients who work in the District...More self-service 24-hour banking machines than any other bank in the District...Client may bank by mail...Prestige of bank.

PRICING: \$1.00 per month, plus 10c per check paid.

CROSS-SELL SERVICES: Statement Savings
Golden Savings

CHECKING ACCOUNTS, SPECIAL - PERSONAL (Continued)

CROSS-SELL SERVICES:

Automatic Savings (Pay Yourself First)
Automatic Payments
Golden Savings Certificates
Certificates of Deposit
American Express Gold Card
Personal Loans
Safe Deposit Box
Executive Banking
24-hour Banking

BROCHURES AVAILABLE:

Personal Checking Accounts (Form M-11)
Terms and Conditions (Form M-13)

STATEMENT SAVINGS

DESCRIPTION: Union First offers this savings program to meet the short-range savings goals of its clients. The account may be opened with \$100 minimum deposit (\$5 for minor children of clients or at officer's discretion). Deposits earn 5 percent interest daily, the maximum amount a bank can pay on this type of account. Interest is compounded quarterly and credited to the account as of the close of business the last day of March, June, September, and December. Funds may be withdrawn without an interest penalty at any time.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 24, and the New Accounts Handbook, Chapter 8.

PROSPECTS: Individuals with short-range goals, small savers, young savers who are just beginning a savings program, organizations, and profit-making businesses (up to \$150,000).

CLIENT BENEFITS: F.D.I.C. protection...Client receives a quarterly statement showing deposits, withdrawals and interest earned...Interest credited to the account at the end of each calendar quarter for greater fund availability...Improve profits by having funds in an interest-bearing account...Automatic transfer from checking account can be arranged to facilitate saving...May be used as collateral on loans...Automatic deposit of Social Security checks...Convenience of banking by mail.

ADVANTAGES FOR UNION FIRST CLIENTS:

Various ways of handling savings transactions: by mail with bank-by-mail kits; at offices conveniently located throughout the District; through three drive-in banks, six walk-up windows, and 13 self-service 24-hour banking machines...Savings accounts may be used as collateral on loans...Prestige of bank.

PRICING: \$1.00 charge for each withdrawal in excess of four during a quarter, if average balance for quarter is less than \$500.

\$1.00 a month service charge, if average balance for quarter is less than \$100.

STATEMENT SAVINGS
(Continued)

PRICING
CONTINUED:

\$6.00 service charge each March and September for accounts with no activity (deposits or withdrawals) for 600 days.

CROSS-SELL
SERVICES:

Golden Savings
Golden Savings Certificates
Certificates of Deposit
Checking Account
Personal Loans
Executive Banking
American Express Gold Card
Safe Deposit Box
24-hour Banking

BROCHURES
AVAILABLE:

Savings Plans (Form M-10)
Terms and Conditions (Form M-13)

GOLDEN SAVINGS

DESCRIPTION:

Union First offers Golden Savings to its clients with intermediate-range goals. The account may be opened with \$1,000 minimum deposit. Deposits earn 5-1/2 percent interest daily. Interest is compounded quarterly and credited to the account as of the close of business the last day of March, June, September, and December. Withdrawals may be made at any time, subject to penalty for early withdrawal. Withdrawals may be made without an interest penalty during the first ten days of each calendar quarter, providing money withdrawn has been on deposit at least 90 days, or at any time after 90 days' prior written notice. Penalty for early withdrawal: If money withdrawn has been on deposit for three months or less, all interest on the money is forfeited. If money withdrawn has been on deposit for more than three months, all interest since the last day of the previous calendar quarter on the money withdrawn is forfeited.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 24, and the New Accounts Handbook, Chapter 9.

PROSPECTS:

Individuals with intermediate-range goals and non-profit organizations.

CLIENT BENEFITS:

F.D.I.C. protection...Client receives a quarterly statement showing deposits, withdrawals and interest earned...Interest credited to the account at the end of each calendar quarter for greater fund availability...Improve profits by having funds in an interest-bearing account...Higher interest rate paid than with Statement Savings...Automatic transfer from checking account can be arranged to facilitate savings...May be used as collateral on loans...Automatic deposit of Social Security checks...Convenience of banking by mail.

ADVANTAGES FOR UNION FIRST CLIENTS:

Various ways of handling savings transactions: by mail with bank-by-mail kits; at offices conveniently located throughout the District; through three drive-in banks, six walk-up win-

GOLDEN SAVINGS (Continued)

ADVANTAGES FOR UNION FIRST CLIENTS:

dows, and 13 self-service 24-hour banking machines...
Savings accounts may be used as collateral on loans
...Prestige of bank.

CROSS-SELL SERVICES:

Statement Savings
Golden Savings Certificates
Certificates of Deposit
Checking Account
Personal Loans
Executive Banking
American Express Gold Card
Safe Deposit Box
24-hour Banking

BROCHURES AVAILABLE:

Savings Plans (Form M-10)
Terms and Conditions (Form M-13)

GOLDEN SAVINGS CERTIFICATES

DESCRIPTION:

Union First issues non-negotiable savings certificates to individuals, businesses, and organizations. Certificates are issued for amounts of \$1,000 or more in maturities of 30 days to six years, subject to management policy as set from time to time. Interest rates vary with the length of time the money is invested.

Presently, Union First is paying the maximum interest rates allowed on Golden Savings Certificates:

30 to 89 days	5 percent
90 days or more but less than 1 year	5-1/2 percent
1 year or more but less than 30 months	6 percent
30 months or more but less than 4 years	6-1/2 percent
4 years or more but less than 6 years	7-1/4 percent
6 years only	7-1/2 percent

Certificates are automatically renewable on maturity. Interest, payable at maturity on certificates of less than one year and at the end of each calendar quarter on certificates of one year or more, is paid by crediting the certificate and allowing the interest to compound, crediting a savings account, crediting a checking account, or a Cashier's Check payable to the client.

Savings certificates may be redeemed at any time without notice of any kind to the bank. When the certificate is redeemed before maturity, interest on the money withdrawn will be paid at a rate of 5 percent for the time the money was in the bank, or since the last maturity date, if the certificate has been renewed, minus three months of that interest. If the money has been on deposit for three months or less, all interest will be forfeited.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 24, and the New Accounts Handbook, Chapter 11.

UNION¹ST

GOLDEN SAVINGS CERTIFICATES (Continued)

PROSPECTS:	More substantial individual savers, businesses and organizations that have money to invest for a fixed period of time.
CLIENT BENEFITS:	Interest compounded or paid quarterly for greater fund availability...Interest may be paid by crediting the certificates and allowing the interest to compound, crediting a savings account, crediting a checking account, or a Cashier's Check payable to the client...Highest interest paid for money invested for a fixed period of time...Convenience of having certificates automatically renewed on maturity...Various maturities for client flexibility...F.D.I.C. protection...Certificates may be used as collateral for a loan...Client receives an annual statement of interest earned.
ADVANTAGES FOR UNION FIRST CLIENTS:	Certificates automatically renewed on maturity for client convenience...Offices conveniently located throughout the District...May be used as collateral on loans...Prestige of bank...Full service bank.
CROSS-SELL SERVICES:	Statement Savings Golden Savings Certificates of Deposit Checking Account American Express Gold Card Executive Banking Personal Banking Personal Loans Commercial Services Safe Deposit Box
BROCHURES AVAILABLE:	Savings Plans (Form M-10)

CERTIFICATES OF DEPOSIT

DESCRIPTION:

Union First issues certificates of deposit to businesses, as well as to individuals and non-profit organizations. These are negotiable time instruments of \$100,000 or more, which are issued for 30 or more days and bear simple interest at various rates set by management, payable at maturity. They may be negotiated or sold at any time. Penalty for early withdrawal: If money on deposit three months or less, all interest is forfeited. If money on deposit more than three months, 5 percent interest is paid on the money for the time it has been in the bank minus three months of that interest.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 24, and the New Accounts Handbook, Chapter 11.

PROSPECTS:

More substantial individual savers, businesses, and organizations.

CLIENT BENEFITS:

Tight control of funds through flexible maturity dates of 30 days or longer with higher interest rates...May be negotiated or sold at any time to insure better management of funds...May be used as collateral for a Union First loan...Client receives an annual statement of interest earned...F.D.I.C. protection.

ADVANTAGES FOR UNION FIRST CLIENTS:

Various maturities for client flexibility...Client receives an annual statement of interest earned...Certificates may be used as collateral for a Union First loan...Offices conveniently located throughout the District...Prestige of bank.

CROSS-SELL SERVICES:

Checking Account
Statement Savings
Golden Savings
Golden Savings Certificates
International Banking Services
Commercial Loans

UNION¹ST

CERTIFICATES OF DEPOSIT (Continued)

CROSS-SELL SERVICES:

Transfer of Funds by Wire
Purchase and Sale of Securities
Cash Care
Earn Guard
Fast Funds
Federal Tax Deposits
Trust Services

BROCHURES AVAILABLE:

Savings Plans (Form M-10)

EXECUTIVE BANKING

DESCRIPTION: Union First offers a package of banking services for the individual whose annual income is \$20,000 or more. The client must apply and be approved for the service and open a checking account with as little as \$100. Services included with Executive Banking are:

1. A personal banker...A bank executive who can handle all the client's banking needs.
2. Monthly financial review...A unique monthly report that summarizes all of the banking relationships which the client designates (except the balances in trust accounts). These include:
 - o Checking Accounts
 - o Statement Savings Accounts
 - o Golden Savings Accounts
 - o Savings Certificates
 - o Consumer Loans
 - o Mortgage Loans
 - o Commercial Loans
 - o Line of Credit Checking Loan Balance
 - o Cash Reserve Available
 - o Investment Management Accounts
 - o Total Market Value
3. Checking with overdraft protection...A convenient source of funds available when the client needs it, without filling out an application, just by writing a check.
4. 24-hour Banking...Every Executive Banking client receives a personal, magnetically encoded card that effectively "opens the bank" seven days a week, 24-hours a day.
5. Preferred loan rates...On unsecured, personal installment loans over \$2,000, Executive Banking clients save 5 percent of the cost of borrowing, when repayments are charged to their checking account.

UNION¹ST

EXECUTIVE BANKING (Continued)

DESCRIPTION: 6. Clients qualifying for a \$2,000 or more line of credit automatically are eligible for an American Express Gold Card. It is an optional extra since the client must pay an annual fee to American Express (see Executive Banking Plus - Pg. 10.108a).

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapters 22.117 and 26; the New Accounts Handbook, Chapter 14, the Tellers Handbook, Chapter 3.106 and 107; the Consumer Loan Handbook, Chapter 8.

PROSPECTS: The individual whose income is \$20,000 or more and Gold Card cardholders.

CLIENT BENEFITS: A personal banker who knows client and his account, backed by a staff of specialists in every area of financial management...Client can handle banking by phone or letter, from across the country, or around the world...Postage paid both ways when banking by mail...Cash reserve protects against emergencies and accidental overdrafts...13 convenient self-service 24-hour banking machines...Client saves with preferred loan rates...Cash reserve costs client nothing unless used...Finance charge lower than that for credit cards and department store accounts...Repayments automatically deducted from checking account...Client may choose to purchase credit life and/or accident and health insurance up to \$10,000 for a maximum of five years.

ADVANTAGES FOR UNION FIRST CLIENTS: Only bank in town offering service...Prestige of bank...Offices conveniently located throughout the District...Saturday banking at six locations...Convenient walk-up windows at six locations...Easy access to three drive-in banks for clients who work in the District...More self-service 24-hour banking machines than any other bank in the District...Bank pays postage both ways for banking by mail.

PRICING: Checking account free of service charges with an average balance of \$300 or more. Flat fee of \$3.00 per month if average balance falls below \$300.

EXECUTIVE BANKING (Continued)

PRICING:

The cash reserve costs nothing unless used. Then the FINANCE CHARGE is calculated on the average daily loan balance, for the exact number of days the money is actually in use, at an ANNUAL PERCENTAGE RATE OF 11.5%.

CROSS-SELL SERVICES:

Executive Banking Plus
American Express Gold Card
Golden Savings
Golden Savings Certificates
Certificates of Deposit
Personal Loans
Safe Deposit Box
Trust Services
Purchase and Sale of Securities

BROCHURES AVAILABLE:

Executive Banking (Form M-14)
Terms and Agreements (Form M-13)

AMERICAN EXPRESS EXECUTIVE CREDIT/GOLD CARD

DESCRIPTION:

Union First offers the American Express Gold Card to clients who earn \$20,000 or more and qualify for a minimum \$2,000 line of credit. Upon approval, the client is given a charge card which may be used at restaurants, hotels, retail shops, airlines, and car rentals around the world.

The Gold Card can be offered two ways:

1. As an optional extra for Executive Banking clients with a \$2,000 or more line of credit (see Executive Banking Plus - Pg. 10.108a).
2. As a charge card with a cash reserve of \$2,000 or more. This is, in effect, a line of credit or pre-approved loan available when the client needs it. A checking account is not required.

Client may also use the Gold Card to obtain cash in several ways:

- Cash personal checks for up to \$100 at participating Gold Card Banks throughout the country. (Maximum: \$500 per 30-day period).
- May take advantage of "Cash Without a Check" and get \$100 charged to the client's line of credit at Union First. (Maximum: \$500 per 7-day period).
- Present the Gold Card at most travel service offices of American Express Company, its subsidiaries, affiliates, and representatives and get up to \$500 in Travelers Cheques in the U.S. in any 7-day period or up to \$1,000 in any 21-day period outside of the U.S., charged to the client's line of credit at Union First. Or, the client may cash a personal check for up to \$500 (\$50 in cash and \$450 in Traveler Cheques).
- May use Gold Card to cash personal checks for up to \$50 at participating hotels and motels across the U.S., Canada, and Western Europe where the client is a registered guest.

AMERICAN EXPRESS EXECUTIVE CREDIT/GOLD CARD (Continued)

DESCRIPTION:

- May obtain from \$100 to \$500 in Travelers Cheques from automated dispensing machines at many airports in the U.S. The client must enroll after the Gold Card is issued for this exclusive service.

For further policies and procedures pertaining to this service, see the Tellers Handbook, Chapter 3.112, and the Consumer Loan Handbook, Chapters 7 and 8.

PROSPECTS:

The individual whose income is \$20,000 or more and Executive Banking clients with a line of credit of \$2,000 or more.

CLIENT

BENEFITS:

Use of the internationally recognized charge card...Eliminates carrying large amounts of cash and many other credit cards...Union First checking account not required...Charges consolidated and paid only once a month...May cash personal checks up to \$100 at participating Gold Card Banks...May get \$100 cash, charged to clients line of credit at Union First, at participating Gold Card Banks. Facilitates cashing personal checks up to \$50 at participating motels and hotels where cardholder registered...Facilitates cashing personal checks up to \$500 (\$50 in cash and \$450 in Travelers Checks) at offices of American Express, its subsidiaries, and representatives in the U.S. and 120 other countries...Client may charge to his Union First line of credit up to \$500 in Travelers Cheques in the U.S. or up to \$1,000 outside the U.S. at offices of American Express, its subsidiaries, and representatives...Cash reserve or line of credit available when client needs it...Both American Express and Union First stand behind the Gold Card.

ADVANTAGES FOR UNION FIRST CLIENTS

Only major bank in the District offering service...Prestige of bank.

PRICING:

Gold Card. \$30.00 annual fee to American Express for the Gold Card.

Cash Reserve. The cash reserve costs nothing unless used. Then the FINANCE CHARGE is calculated on the average daily loan balance, at an ANNUAL PERCENTAGE RATE OF 11.5%.

AMERICAN EXPRESS EXECUTIVE CREDIT/GOLD CARD (Continued)

CROSS-SELL SERVICES:

- Executive Banking Plus
- Checking Account
- Statement Savings
- Golden Savings
- Golden Savings Certificates
- Certificates of Deposit
- Personal Loans
- Safe Deposit Box
- Trust Services
- Purchase and Sale of Securities

BROCHURES AVAILABLE:

American Express Gold Bank Card Brochure/Application

EXECUTIVE BANKING PLUS

DESCRIPTION:

Union First offers Executive Banking Plus to clients who earn \$20,000 or more and qualify for a minimum \$2,000 line of credit. The client must apply and be approved for the service and open a checking account with as little as \$100. Services included with Executive Banking Plus are:

1. A personal banker...A bank executive who can handle all the client's banking needs.
2. Monthly financial review...A unique monthly report that summarizes all of the banking relationships which the client designates (except the balances in trust accounts). These include:
 - * Checking Accounts
 - * Statement Savings Accounts
 - * Golden Savings Accounts
 - * Savings Certificates
 - * Consumer Loans
 - * Mortgage Loans
 - * Commercial Loans
 - * Line of Credit Checking Loan Balance
 - * Cash Reserve Available
 - * Investment Management Accounts
 - * Total Market Value
3. Checking with overdraft protection...A convenient source of funds available when the client needs it, without filling out an application, just by writing a check.
4. 24-hour Banking...Every Executive Banking client receives a personal, magnetically encoded card that effectively "opens the bank" seven days a week, 24-hours a day.
5. Preferred loan rates...On unsecured, personal installment loans over \$2,000, Executive Banking clients save 5% of the cost of borrowing, when repayments are charged to their checking account.

EXECUTIVE BANKING PLUS (Continued)

DESCRIPTION:

6. Travel and entertainment card...The Gold Card is welcomed worldwide for all types of travel and entertainment and at many fine retail and automotive service shops.
7. Emergency money... A client may use the Gold Card to obtain cash in several ways:
 - Cash personal checks for up to \$100 at participating Gold Card Banks throughout the country. (Maximum: \$500 per 30-day period).
 - May take advantage of "Cash Without a Check" and get \$100 charged to the client's line of credit at Union First. (Maximum: \$500 per 7-day period).
 - Present the Gold card at most travel service offices of American Express Company, its subsidiaries, affiliates, and representatives and get up to \$500 in Travelers Cheques in the U.S. in any 7-day period or up to \$1,000 in any 21-day period outside of the U.S., charged to the client's line of credit at Union First. Or, the client may cash a personal check for up to \$500 (\$50 in cash and \$450 in Travelers Cheques).
 - May use Gold Card to cash personal checks for up to \$50 at participating hotels and motels across the U.S., Canada, and Western Europe where the client is a registered guest.
 - May obtain from \$100 to \$500 in Travelers Cheques from automated dispensing machines at many airports in the U.S. The client must enroll after the Gold Card is issued for this exclusive service.

For further information on policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapters 22, 117 and 26; New Accounts Handbook, Chapter 14, Tellers Handbook, Chapter 3, 106, 107 and 112; Consumer Loan Handbook, Chapters 7 and 8.

PROSPECTS:

The individual whose income is \$20,000 or more, Executive Banking clients who qualify for a \$2,000 or more line of credit, and American Express Gold Card cardholders.

EXECUTIVE BANKING PLUS (Continued)

CLIENT BENEFITS:

A personal banker who knows client and his account, backed by a staff of specialists in every area of financial management...Client can handle banking by phone or letter, from across the country, or around the world...Use of internationally recognized charge card...Eliminates carrying large amounts of cash and many other credit cards...Charges consolidated and paid only once a month...May cash personal checks up to \$100 at participating Gold Card Banks...May get \$100 cash, charged to client's line of credit at Union First, at participating Gold Card Banks...Facilitates cashing personal checks up to \$50 at participating motels and hotels where cardholder is registered...Facilitates cashing personal checks up to \$500 (\$50 in cash and \$450 in Travelers Checks) at offices of American Express and its subsidiaries and representatives in the U.S. and 120 other countries...Client may charge to his Union First line of credit up to \$500 in Travelers Cheques in the U.S. or up to \$1,000 outside the U.S. at offices of American Express, its subsidiaries, and representatives...Cash reserve available when client needs it...Both American Express and Union First stand behind the Gold Card...Postage paid both ways when banking by mail...Cash reserve protects against emergencies and accidental overdrafts...13 convenience self-service 24-hour banking machines...Clients save with preferred loan rates...Cash reserve costs client nothing unless used...Finance charge lower than that for credit cards and department store accounts...Repayments automatically deducted from checking account...Client may choose to purchase credit life and/or accident and health insurance up to \$10,000 for maximum of five years.

ADVANTAGES FOR UNION FIRST CLIENTS:

Only bank in town offering Executive Banking service... Only major bank in the District offering the American Express Gold Card...Prestige of bank...Offices conveniently located throughout the District...Saturday banking at six locations...Convenient walk-up windows at six locations...Easy access to three drive-in banks for clients who work in the District...More self-service 24-hour banking machines than any other bank in the District...Bank pays postage both ways for banking by mail.

EXECUTIVE BANKING PLUS (Continued)

PRICING:

Executive Banking. Checking account free of service charges with an average balance of \$300 or more. Flat fee of \$3.00 per month if average balance falls below \$300.

Gold Card. \$30.00 annual fee to American Express.

Cash Reserve. The cash reserve costs nothing unless used. Then the FINANCE CHARGE is calculated on the average daily loan balance, for the exact number of days the money is actually in use, at an ANNUAL PERCENTAGE RATE OF 11.5%.

CROSS-SELL SERVICES:

Statement Savings
Golden Savings
Golden Savings Certificates
Certificates of Deposit
Personal Loans
Safe Deposit Box
Trust Services
Purchase and Sale of Securities

24-HOUR BANKING

DESCRIPTION:

Union First offers its clients self-service banking 7 days a week, 24 hours a day in the form of 24-hour Banking Machines. These teller machines may be activated by a special 24-hour Banking Card.

The 24-hour Banking Machines can handle nine of the basic banking transactions:

CASH WITHDRAWALS (Up to \$100 a day, in \$25 or \$50 increments. Limit of two withdrawals each day.)

1. From checking
2. From savings

DEPOSITS

3. To checking
4. To savings

TRANSFER MONEY

5. From checking to savings
6. From savings to checking

PAYMENTS (Bank loans, mortgage loans, Executive Credit payments, direct payments to Executive Banking line of credit, utility bills, annual rental for safe deposit boxes, etc.)

7. Payment enclosed
8. Deduct from checking
9. Deduct from savings

24-hour Banking Machines are located at:

MAIN OFFICE
740 15th Street, N.W.

COLUMBIA PLAZA OFFICE
502 23rd Street, N.W.

24-HOUR BANKING (Continued)

DESCRIPTION:

CONNECTICUT AND L OFFICE
1100 Connecticut Avenue, N.W.

G STREET OFFICE
1325 G Street, N.W.

MAC ARTHUR AND ARIZONA OFFICE
5201 MacArthur Boulevard, N.W.

PENNSYLVANIA AND E OFFICE
1329 E Street, N.W.

WISCONSIN AND CALVERT OFFICE
3700 Calvert Street, N.W.

WISCONSIN AND WESTERN OFFICE
5351 Wisconsin Avenue, N.W.

4TH AND E, S.W., OFFICE
420 4th Street, S.W.

18TH AND K OFFICE
1800 K Street, N.W.

20TH AND M OFFICE
1919 M Street, N.W.

CONNECTICUT AND N OFFICE
1300 Connecticut Avenue, N.W.

17TH AND PENNSYLVANIA OFFICE
1701 Pennsylvania Avenue, N.W.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 22.119, the New Accounts Handbook, Chapter 15, and the 24-hour Banking Handbook.

24-HOUR BANKING (Continued)

PROSPECTS: Clients with a checking account.

CLIENT
BENEFITS: Convenience of self-service banking 7 days a week, 24-hours a day...13 convenient locations...Banking can be done in privacy...Withdrawals can be charged to an Executive Banking overdraft account...Nine basic banking transactions can be handled.

ADVANTAGES FOR
UNION FIRST
CLIENTS: More machines than any other bank in the District...13 convenient locations...Client chooses his own security number.

PRICING: \$1.00 for each card issued.

CROSS-SELL
SERVICES: Statement Savings
Executive Banking
American Express Gold Card
Automatic Savings (Pay Yourself First)
Personal Loans

BROCHURES
AVAILABLE: 24-hour Banking (Form M-9)
Terms and Conditions (Form M-13)

DRIVE-IN BANKING

DESCRIPTION: Union First offers drive-in banking at three locations. These drive-in windows are open extended hours to meet the needs of clients.

Clients can handle most of their basic banking transactions at the drive-in windows--including cash withdrawals, deposits, money transfers, payments to the bank, and Money Order purchases. Cashier's Checks, certified checks, travelers checks, and savings bonds are available only in the banking lobbies. All transactions after 2:00 p.m. posted as the next day's business.

Drive-in windows and hours open:

MAC ARTHUR AND ARIZONA OFFICE
5201 MacArthur Boulevard, N.W.

OPEN: Monday - Friday, 9:00 a.m. - 7:00 p.m.
Saturday, 9:00 a.m. - 12:00 noon

WISCONSIN AND CALVERT OFFICE
3700 Calvert Street, N.W.

OPEN: Monday - Friday, 9:00 a.m. - 7:00 p.m.
Saturday, 9:00 a.m. - 12:00 noon

WISCONSIN AND WESTERN OFFICE
5351 Wisconsin Avenue, N.W.

OPEN: Monday - Friday, 9:00 a.m. - 7:00 p.m.
Saturday, 9:00 a.m. - 12:00 noon

PROSPECTS: Individuals, organizations, partnerships, and corporations who must do their banking but are rushed for time or prefer to do their banking from their car.

DRIVE-IN BANKING (Continued)

CLIENT BENEFITS:

Client may transact banking business without having to leave his automobile...Convenient locations...Easy access for clients who work in the District.

ADVANTAGES FOR UNION FIRST CLIENTS:

Easy access from major thoroughfares...three convenient locations.

CROSS-SELL SERVICES:

24-hour Banking
Statement Savings
Checking Account
Executive Banking
American Express Gold Card
Automatic Savings (Pay Yourself First)
Automatic Payments

BROCHURES AVAILABLE:

None

SATURDAY BANKING

DESCRIPTION: Union First offers its clients Saturday banking at six convenient locations. Clients can handle all of their banking transactions.

Offices offering Saturday banking from 9:00 a.m. - 12:00 noon are:

WISCONSIN AND WESTERN OFFICE
5351 Wisconsin Avenue, N.W.

7TH STREET OFFICE
509 7th Street, N.W.

WISCONSIN AND CALVERT OFFICE
3700 Calvert Street, N.W.

MAC ARTHUR AND ARIZONA OFFICE
5201 MacArthur Boulevard, N.W.

20TH AND M OFFICE
1919 M Street, N.W.

PENN-BRANCH OFFICE
3200 Pennsylvania Avenue, S.E.

PROSPECTS: Individuals, organizations, corporations, or partnerships.

CLIENT
BENEFITS: Convenience...All banking transactions can be handled at client's convenience on Saturday morning.

ADVANTAGES FOR
UNION FIRST
CLIENTS: Six convenient locations.

CROSS-SELL
SERVICES: 24-hour Banking
Statement Savings
Checking Account
Executive Banking
American Express Gold Card

SATURDAY BANKING
(Continued)

CROSS-SELL
SERVICES:

Automatic Savings (Pay Yourself First)
Automatic Payments

BROCHURES
AVAILABLE:

None

WALK-UP BANKING

DESCRIPTION:

Union First offers its clients a convenience teller service in the form of walk-up windows. These walk-up windows are open to meet the needs of clients when the banking offices are closed.

Clients can handle most of their basic banking transactions at the walk-up windows---including cash withdrawals, deposits, money transfers, payments to the bank, and Money Order and bus token purchases. Cashier's Checks, certified checks, travelers checks, and savings bonds are available only in the banking lobbies. All transactions after 2:00 p.m. posted the next business day.

Walk-up Windows and hours open:

17TH AND PENNSYLVANIA OFFICE
1701 Pennsylvania Avenue, N.W.

OPEN: Monday - Friday, 3:00 p.m. - 5:15 p.m.

G STREET OFFICE
1325 G Street, N.W.

OPEN: Monday - Friday, 3:00 p.m. - 5:15 p.m.

20TH AND M OFFICE
1919 M Street, N.W.

OPEN: Monday - Friday, 3:00 p.m. - 5:15 p.m.

4TH AND E, S.W. OFFICE
420 4th Street, S.W.

OPEN: Monday - Friday, 3:00 p.m. - 5:15 p.m.

15TH STREET OFFICE
1123 15th Street, N.W.

OPEN: Monday - Friday 3:00 p.m. - 5:15 p.m.

WALK-UP BANKING (Continued)

DESCRIPTION: CONNECTICUT AND K OFFICE
1011 Connecticut Avenue, N.W.

OPEN: Monday - Friday 3:00 p.m. - 5:15 p.m.

PROSPECTS: Individuals, organizations, partnerships, and corporations.

CLIENT BENEFITS: Convenience...Teller service available when the banking offices are closed.

ADVANTAGES FOR UNION FIRST CLIENTS: Six convenient locations...Routine banking transactions handled...Extended banking hours.

CROSS-SELL SERVICES: 24-hour Banking
Statement Savings
Checking Account
Executive Banking
American Express Gold Card
Automatic Savings (Pay Yourself First)
Automatic Payments

BROCHURES AVAILABLE: None

UNION¹ST

BANK BY MAIL

DESCRIPTION:

Union First furnishes its clients bank-by-mail kits for savings or checking by mail. These kits include envelopes addressed to the bank, deposit slips, and a folder with the client's name and address for use in returning validated deposit slips. Payments may also be made by mail on consumer loans, real estate loans, and Executive Credit. Clients may use the convenience of mail to open additional accounts.

Union First pays the postage both ways for Executive Banking clients.

PROSPECTS:

Individuals who wish to take advantage of the services offered by Union First but do not want to come into one of our offices.

CLIENT BENEFITS:

Convenience of making deposits easier and faster using the bank-by-mail kits...Postage paid both ways for Executive Banking clients.

ADVANTAGES FOR UNION FIRST CLIENTS:

Furnishes the client with bank-by-mail kits for convenience in making deposits...Clients may open additional accounts by mail...Postage paid both ways for Executive Banking clients.

CROSS-SELL SERVICES:

Checking Account
Statement Savings
24-hour Banking
Executive Banking
American Express Gold Card
Automatic Savings (Pay Yourself First)
Automatic Payments

BROCHURES AVAILABLE:

None

SAFE DEPOSIT BOX RENTAL

DESCRIPTION:

Union First offers its clients a choice from over 12,000 safe deposit boxes. Sizes and prices vary from office to office, ranging from \$6.00 annually for a small box (21-3/4" x 4-3/4" x 3/4") to \$150.00 annually for a large box (21-3/4" x 16-1/2" x 11-1/2").

We offer our clients three types of contracts: single renter, co-renter, and business (covering institutions, organizations, associations, etc.). Under each type of contract, the renter may authorize a deputy(s) to enter the box.

Reasonable care is taken to protect our client's valuables by following a strict security procedure in admitting entrance, recording visits, opening boxes, and allowing access upon death of the renter.

Each box is controlled by two keys. The client retains one and the Union First vault attendants control the other key. Both keys must be used to open a box.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 22.102, and the Safe Deposit Handbook.

PROSPECTS:

Individuals, corporations, partnerships, organizations, estates, guardianships, and trusteeships.

CLIENT BENEFITS:

Low-cost protection of valuable items, such as stock certificates, bonds, insurance policies, deeds, leases, marriage licenses, birth certificates, jewelry, etc...Valuables held in one location where access is restricted to only the renter(s) or the appointed deputy(s).

ADVANTAGES FOR UNION FIRST CLIENTS:

Wide variety of sizes in boxes available...Private, locked booths are available for clients to use when examining the contents of their boxes...Vault attendant is available to offer fast and courteous service...Annual rental payments tailored to fit the client's needs.

SAFE DEPOSIT BOX RENTAL (Continued)

PRICING: Prices vary from \$6.00 to \$150.00 annually depending on the size of the box and the location of the banking office.

CROSS-SELL
SERVICES: Checking Account
Statement Savings
Golden Savings
Golden Savings Certificates
Certificates of Deposit
Trust Services
Purchase and Sale of Securities

BROCHURES
AVAILABLE: None

SAFEKEEPING - SHORT TERM

DESCRIPTION:

Union First provides safekeeping services to temporarily store various securities as a convenience for our individual and commercial clients. This short-term safekeeping generally does not exceed 30 days. Typical uses include:

1. When Union First handles the purchase of client securities, the securities are held until the client can pick them up or transfer them to a safe deposit box.
2. When a client purchases a Union First Certificate of Deposit the certificate can be held in safekeeping until maturity.
3. Collateral for a loan which has been paid is transferred to safekeeping pending further disposition by the client.
4. When the Money Center acts as purchasing agent for Treasury bills or other short-term, discounted securities, the securities may be held in safekeeping up to one year.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 22.111.

PROSPECTS:

Individuals, partnerships, corporations, correspondent banks, non-profit organizations, and unions.

CLIENT BENEFITS:

Securities are safeguarded...Transactions can be accomplished rapidly by mail or by phone...Eliminates unnecessary trips to the bank when securities mature.

ADVANTAGES FOR UNION FIRST CLIENTS:

Client is able to buy and sell securities freely and quickly...No charge for short-term safekeeping.

PRICING:

There is no charge for short-term safekeeping.

SAFEKEEPING - SHORT TERM
(Continued)

CROSS-SELL
SERVICES:

Safe Deposit Box
Certificates of Deposit
Golden Savings Certificates
Golden Savings
Executive Banking
Trust Services

BROCHURES
AVAILABLE:

None

DOMESTIC LETTERS OF INTRODUCTION

DESCRIPTION: Union First contact officers will write letters of introduction to other banks, immigration officers, or any business or individual that the client requests, and relate to them our banking experience with the client. These letters should be addressed to a specific person or business--not "To Whom It May Concern."

PROSPECTS: Individuals, proprietorships, corporations, partnerships, and organizations.

ADVANTAGES FOR UNION FIRST CLIENTS: Capable and willing staff to write letters as requested.

CROSS-SELL SERVICES: International Services
Travelers Checks
Executive Banking
American Express Gold Card

PRICING: There is no charge for this service.

BROCHURES AVAILABLE: None

PURCHASE AND SALE OF SECURITIES

DESCRIPTION: When requested by a client, Union First will assist (act as agent) in the purchase and sale of securities such as:

Treasury bills
Treasury notes
Treasury bonds
Federal agencies
Commercial paper
Stocks
Tax-exempt bonds and notes

Client requests for Union First to assist in the purchase or sale of securities should be directed to the office of domicile of the account. Assistance is rendered when the client furnishes us exact information as to the securities he wishes to purchase, the amount he wishes to invest, or the asking price for securities he is selling. The client may designate his own broker or ask the bank to use a broker of its choice. Through the Money Center, we can provide current yields and rates on selected short-term investment issues. Should the client desire or require investment counseling, he should be referred to the Trust Department, which provides an Investment Management service.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 22.129.

PROSPECTS: Individuals, corporations, non-profit organizations, unions, partnerships, foundations, and banks.

CLIENT
BENEFITS: Keeps cash working all the time...Ease in the handling of the purchase and sale of securities...Independent professional assistance.

ADVANTAGES FOR
UNION FIRST
CLIENTS: Immediate credit to account when securities are sold...
Automatic credit to account at maturity of securities if

PURCHASE AND SALE OF SECURITIES (Continued)

ADVANTAGES FOR UNION FIRST CLIENTS:

held in safekeeping..Constant contact with the market place...Professional knowledge of short-term money-market instruments and up-to-the-minute information on rates and availabilities.

PRICING: \$20.00 per transaction.

CROSS-SELL SERVICES:

Trust Services
Certificates of Deposit
Savings Certificates
Safe Deposit Box
Checking Account

BROCHURES AVAILABLE:

None

COLLECTIONS

DESCRIPTION:

Union First will process incoming and outgoing items for collection for clients. These items include:

Outgoing - Automobile and insurance drafts, draft to close a client's account at another bank, and insufficient funds checks received by our clients.

Incoming - Collateral, securities or merchandise purchased by a client, incoming checks on our bank for collection, and drafts to close accounts at our bank.

Outgoing items are guaranteed and are sent to banks and savings and loans where they are payable and Federal Reserve Banks. The client's account will be credited when final collection is made.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 19.105.

PROSPECTS:

Banks, corporations, individuals, non-profit organizations, and unions.

CLIENT

BENEFITS:

Save the time and expense associated with collections... Greater fund availability because accounts are credited immediately when final collection is made...Frees employees to perform profit-oriented functions...Relieves tension associated with collection uncertainty.

ADVANTAGES FOR UNION FIRST CLIENTS:

Minimum cost for complete collections service...Collections are handled on a daily basis to insure fund availability... All collections guaranteed...Experienced staff.

PRICING:

\$3.00 minimum charge (may be waived for banks in the D.C. area if on a reciprocal basis).

COLLECTIONS

CROSS-SELL SERVICES:

Checking Account
Transfer of Funds by Wire

BROCHURES AVAILABLE:

None

10.118 COLLECTIONS

NOTE COLLECTIONS

DESCRIPTION: We will assist clients in the collection of monies due them on various types of promissory notes, which they may own. These notes may be payable monthly, quarterly, semi-annually, or annually. The client may choose to have funds credited to his account or a Cashier's Check sent to him when collection is made.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 19.104.

PROSPECTS: Individuals, corporations, non-profit organizations, partnerships, and unions.

CLIENT BENEFITS: Save the time and expense in receiving payments on various promissory notes owned...Greater fund availability because accounts are credited the day payment is made...Frees employees to perform other functions.

ADVANTAGES FOR UNION FIRST CLIENTS: Careful records are kept for each individual note...Staff experienced in handling note collections.

PRICING: This service will cost the owner \$5.00 when the order is entered and \$3.00 for each payment received.

CROSS-SELL SERVICES: Collections
Automatic Transfer of Funds
Checking Account
Savings Account

BROCHURES AVAILABLE: None

CASHIER'S CHECKS

DESCRIPTION:	<p>Union First issues Cashier's Checks to the client who needs to assure the receiver of the check that the check will be paid upon presentation . A Cashier's Check must be payable to a specific person, business, or estate. It cannot be payable to bearer or cash. The amount of the check is printed by a protectograph so that alteration cannot be made.</p> <p>For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 19.116, and the Tellers Handbook, Chapter 2.</p>
PROSPECTS:	<p>Clients--individuals, proprietorships, partnerships, corporations, and organizations.</p>
CLIENT BENEFITS:	<p>Peace-of-mind in knowing that the Cashier's Check will be accepted as final payment...Provides a legal record of payment...Ease of purchase at all branch offices.</p>
ADVANTAGES FOR UNION FIRST CLIENTS:	<p>Available at all branch offices or by mail.</p>
PRICING:	<p>The fee per Cashier's Check issued is \$1.50.</p>
BROCHURES AVAILABLE:	<p>None</p>

MONEY ORDERS

DESCRIPTION:	<p>Designated tellers at each branch office sell money orders to individuals and businesses who either do not have checking accounts or are dealing with a concern that will not accept a personal check. Money orders may be purchased in amounts up to \$500.00.</p> <p>For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 19.101, and the Tellers Handbook, Chapters 2.106, 5.103, 104, 105, and 106.</p>
PROSPECTS:	Individuals, proprietorships, partnerships, corporations, and organizations.
CLIENT BENEFITS:	Can be used in lieu of sending cash for payment when the client does not have a checking account or when the concern being dealt with will not accept a personal check...Third parties may purchase the money orders for the user...Legal proof of payment...Client retains a copy of the money order for his private records...Nominal cost.
ADVANTAGES FOR UNION FIRST CLIENTS:	Ease of purchase at all branch offices.
PRICING:	The fee per money order is \$.50.
CROSS-SELL SERVICES:	Checking Account Statement Savings Cashier's Checks Certified Checks Bank Drafts
BROCHURES AVAILABLE:	None

BANK DRAFTS - FOREIGN AND DOMESTIC

DESCRIPTION: Each Union First branch office issues bank drafts for clients on our account at Chase Manhattan and Morgan Guaranty in New York. Bank drafts are useful when the client's business associate requests more readily available funds in other sections of the country or the world. In addition, travelers sometime request bank drafts instead of travelers checks.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 22.103, and the Tellers Handbook, Chapter 2.103.

PROSPECTS: Individuals, proprietorships, partnerships, corporations, and organizations.

CLIENT BENEFITS: Peace of mind in knowing that bank draft will be accepted as final payment...Nominal service charge...Provides a legal record of payment...Funds are immediately available in the city they are needed...Ease of purchase at all convenient offices.

ADVANTAGES FOR UNION FIRST CLIENTS: Funds available world-wide.

PRICING: \$1.50 service charge for domestic bank drafts. The service charge for foreign bank drafts varies from \$5.00 to \$25.00, depending on amount.

CROSS-SELL SERVICES: Travelers Checks
Checking Account
Cashier's Checks
Money Orders
Certified Checks
Collections
Fast Funds (Lock Box Account)

BROCHURES AVAILABLE: None

TRAVELERS CHECKS (DOMESTIC)

DESCRIPTION: Each Union First branch office sells American Express and First National City Bank travelers checks to its clients. American Express travelers checks are sold only in multiples of \$50.00 in envelopes of 3,5,7 or 10 checks of the same denomination. First National City Bank travelers checks are sold in denominations of \$10.00, \$20.00, \$50.00 and \$100.00. Travelers checks provide the client with low-cost funds which are convertible to local currency anywhere in the world.

The main benefit of travelers checks is that if they are lost or stolen, restitution can be quickly obtained. All Union First banking offices will handle replacement of lost or stolen American Express or First National City Bank travelers checks.

American Express: Any American Express Office will handle replacement; or in emergency situations during nonbusiness hours, most Holiday Inns are authorized to replace up to \$100.00.

First National City: If travelers checks are lost or stolen in the continental United States, the client calls toll free 800-243-6000 (in Connecticut the number is 1-800-882-6500). In Alaska, Hawaii, and anywhere else in the world, all principal hotels, embassies, or consultates have an up-to-date list of refund agents in their area.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 19.102, the Tellers Handbook, Chapters 2.105, 5.102, 108, 108a, and 109, the New Accounts Handbook, Chapter 12.

PROSPECTS: Individuals

CLIENT

BENEFITS: For a nominal fee, the client is assured of instant funds at hotels, stores, banks, restaurants, etc...Serves the same purpose as cash...Ease of replacement if lost or stolen.

UNION¹ST

TRAVELERS CHECKS (DOMESTIC) (Continued)

ADVANTAGES FOR UNION FIRST CLIENTS:

Ease of purchase at all convenient branch offices...Offers both American Express and First National City travelers checks.

PRICING: 1% of the amount of checks purchased.

CROSS-SELL SERVICES:

Executive Banking
Money Orders
Cashier's Checks
Bank Drafts
Certified Checks
Checking Account
Statement Savings
Safe Deposit Box

BROCHURES AVAILABLE:

None

CERTIFIED CHECKS

DESCRIPTION: Union First will certify that a checking account client's check will be paid on demand. Funds in the client's account are then earmarked for payment of that check and the check becomes an obligation of the bank.

Checks imprinted with the client's name must be used, collected funds must be on deposit at the time a client requests that we certify a check.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 19.117.

PROSPECTS: Any checking account client.

CLIENT BENEFITS: Peace-of-mind in knowing that the the certified check will be accepted as final payment...Build business associate's confidence in your ability to pay, resulting in greater credit possibilities...Ease of purchase at all branch offices.

ADVANTAGES FOR UNION FIRST CLIENTS: We will certify checks for all types of checking accounts --regular, special, and commercial.

PRICING: \$1.50

CROSS-SELL SERVICES: Cashier's Checks
Travelers Checks
Money Orders
Bank Drafts
Collections

BROCHURES AVAILABLE: None

U. S. GOVERNMENT SAVINGS BONDS

DESCRIPTION:

Through authorized representatives at each branch office, Union First issues and redeems Series E savings bonds and places orders at the Federal Reserve for the purchase and/or redemption of Series H bonds, both of which earn 6 percent if held to maturity...five years on Series E bonds and ten years on Series H bonds.

Union First will also redeem Savings Notes (Freedom Shares) although the Government has ceased to offer new ones for sale.

Series E bonds are discount bonds which may be purchased in denominations of \$25.00, \$50.00, \$75.00, \$100.00, \$200.00, \$500.00, and \$1,000.00. Interest is compounded semi-annually to maturity. Series E bonds may be redeemed anytime after 60 days from the issue date.

Series H bonds are par value bonds which are issued at the Federal Reserve Bank in Richmond in denominations of \$500.00, \$1,000.00, \$5,000.00, and \$10,000.00. Interest is paid semi-annually to the registered owner. Series H bonds may be redeemed anytime after six months from the issue date at the Federal Reserve Bank in Richmond or the U. S. Treasury Department, Room 2134, 15th and Pennsylvania Avenue, N.W., Washington, D. C. We will assist our clients.

Individuals may purchase up to \$10,000 face amount in bonds in one year.

If bonds are lost, destroyed, mutilated or stolen, Union First can assist the client in obtaining replacement bonds. In case of the death of the owner, Union First can assist the beneficiary or surviving co-owner in obtaining a reissue or redemption.

Repetitive bulk orders for savings bonds are handled at the G Street Office -- 637-6272.

For further policies and procedures pertaining to this service, see the Policies and Instruction Manual, Chapter 22.101, and the Tellers Handbook, Chapter 7.



U. S. GOVERNMENT SAVINGS BONDS
(Continued)

PROSPECTS: Individuals, corporations, and organizations.

CLIENT

BENEFITS: A vehicle for savings that combines yield, security, and liquidity...Ease of purchase, either in person or through a company plan. Series E bonds - client may choose to delcare interest paid annually on defer un-til bonds are redeemed...Series E bonds may be converted to a Series H bond and interest on the the Series E bonds deferred until the Series H bond is redeemed.

ADVANTAGES FOR
UNION FIRST
CLIENTS:

Bonds are issued by an authorized representative at each convenient branch office...Bonds may be redeemed for cash or the proceeds deposited in client's account.

PRICING: There is no charge for issuing or redeeming savings bonds.

CROSS-SELL
SERVICES:

Safe Deposit Box
Checking Account
Statement Savings
Golden Savings
Golden Savings Certificates
Certificates of Deposit
Trust Services

BROCHURES
AVAILABLE:

None

BUS TOKENS

DESCRIPTION: All Union First branch offices sell Metro bus tokens for the convenience of our clients. These tokens can be used as fare for the D. C. buses and, with additional money, as fare for the Virginia and Maryland buses.

For further policies and instructions pertaining to this service, see the Tellers Handbook, Chapter 5.110.

PROSPECTS: Individuals who ride the buses.

CLIENT BENEFITS: Convenient offices throughout the District...Handle all transactions at one place--make deposits and withdrawals, pay bills, and buy Metro bus tokens.

ADVANTAGES FOR UNION FIRST CLIENTS: Offices throughout the District for the client's convenience in purchasing Metro bus tokens.

PRICING: Adult Fare -- 10 tokens @ \$4.00. School Children's Fare -- 10 tokens @ \$1.00. (Must have School Application for Pupil's Tokens.)

CROSS-SELL SERVICES: All banking services.

BROCHURES AVAILABLE: None

FARECARDS

DESCRIPTIONS: All Union First branch offices sell Metro farecards for the convenience of our clients. These farecards are for use on all lines of the Metrorail system.

For further policies and instructions pertaining to this service, see the Tellers Handbook, Chapter 5.110 a.

PROSPECTS: Commuters who ride the subway.

CLIENT BENEFITS: Convenient offices throughout the District...Handle all transactions at one place--make deposits and withdrawals, pay bills, and buy Metro farecards.

ADVANTAGES FOR UNION FIRST CLIENTS: Offices throughout the District for the client's convenience in purchasing Metro farecards.

PRICING: \$8.00 value farecard. Farecards in other denominations must be purchased from Metro or at the subway stations.

CROSS-SELL SERVICES: All banking services

BROCHURES AVAILABLE: None

FOOD STAMPS - FOR DEPOSIT OR SALE

DESCRIPTION:

FOR DEPOSIT - All Union First branch offices accept food stamps for deposit to client's accounts. Each deposit must be accompanied by an encoded redemption card issued by the Food Stamp Division, Food & Nutrition Service, Department of Agriculture. All food stamp deposits are accepted subject to count.

FOR SALE - Two Union First branch offices participate in the sale of food stamps:

7th Street Office, 509 7th Street, N.W.
(between E and F Streets)

Penn-Branch Office, 3200 Pennsylvania Avenue, S.E.

Food stamps are offered for sale to card-bearing individuals assigned to our branch offices. Individuals purchasing food stamps must have a card with their picture on it, issued by Food Stamp Division, Food & Nutrition Service, Department of Agriculture, 500 First Street, N.W. Food stamps must be paid for by Government check or cash (money orders and personal checks are not accepted). If a proxy is used to pick up the food stamps, the proxy must have a proxy card with both his picture and a picture of the person receiving the food stamps. These cards are also issued by the Food Stamp Division.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 22.109, and the Tellers Handbook, Chapter 5.112.

PROSPECTS:

Individuals with cards issued by the Food Stamp Division and businesses with redemption cards issued by the Food Stamps Division.

CLIENT BENEFITS:

Convenient offices for both redemption and sale of food stamps.

ADVANTAGES FOR UNION FIRST CLIENTS:

All offices accept food stamps for deposit to clients' accounts
...Two convenient branch offices offer food stamps for sale.

FOOD STAMPS - FOR DEPOSIT OR SALE
(Continued)

CROSS-SELL
SERVICES:

Commercial Checking Accounts (for businesses depositing food stamps).

BROCHURES
AVAILABLE:

None

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IN-PERSON PAYMENT OF UTILITY BILLS

DESCRIPTION:	Union First provides Paying/Receiving Tellers in all offices to accept client utility bill payments. Types of payments accepted include: <ol style="list-style-type: none">1. Washington Gas Light Company2. Potomac Electric Power Company3. C & P Telephone Company4. Washington Suburban Sanitary Service For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 19.114, and the Tellers Handbook, Chapter 3.105.
PROSPECTS:	Any client making one of the four types of payments.
CLIENT BENEFITS:	Convenience of having many locations where payments may be made...Several transactions may be conducted at the same Paying/Receiving Teller.
ADVANTAGES FOR UNION FIRST CLIENTS:	Teller efficiency in servicing the various types of bill payments.
PRICING:	There is no charge for this service.
CROSS-SELL SERVICES:	Checking Account 24-hour Banking Statement Savings Golden Savings Money Orders Cashier's Checks
BROCHURES AVAILABLE:	None

AUTOMATIC BANK DEPOSITS

DESCRIPTION:

Union First offers its clients the opportunity to automatically deposit different types of income by having the payments come directly to the bank. Types of payments which may be deposited in this fashion might include oil and gas royalties, dividends, military retirement, Social Security, life insurance benefit payments, government payroll, company payroll checks, and others.

To receive this service, the client just contacts the paying company and fills out the authorization form required by the company authorizing the company to make deposits directly to the client's account at Union First. Forms for direct deposit of Social Security checks are available from the Bank-by-Mail Department, who must also be furnished a copy of the authorization. The checks will then be directed to the Bank-by-Mail Department for deposit into the account designated by the client. The check should include both the client's name and account number.

The client may choose to have the total amount of the check deposited to either a checking or savings account or split between checking and savings accounts. The client receives a validated duplicate deposit slip for all deposits to his account.

All automatic deposits are mailed to Union First National Bank, Bank-by-Mail Department, 740 15th Street, N.W., Washington, D. C., 20005.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 22.104.

PROSPECTS:

Individuals

CLIENT BENEFITS:

Save time and expense of bringing or mailing in deposit of funds...Funds are available quicker...Improve profits by getting funds into an interest-bearing account quicker...Eliminate losses from having checks misplaced or stolen.

UNION¹ST

AUTOMATIC BANK DEPOSITS (Continued)

ADVANTAGES FOR UNION FIRST CLIENTS:

Special section of the bank set up to handle direct deposits to assure quick processing of the deposit and maximum availability of funds...No charge for this service.

PRICING:

There is no charge for this service.

CROSS-SELL SERVICES:

Executive Banking
Statement Savings
Automatic Savings (Pay Yourself First)
Automatic Payments
Checking Account
Personal Loans
American Express Gold Card

BROCHURES AVAILABLE:

None

AUTOMATIC SAVINGS (PAY YOURSELF FIRST)

DESCRIPTION: Union First will automatically transfer a predetermined amount from a client's checking account to his savings account (either Statement or Golden Savings) upon the instructions of our client. This transfer can be made on any given date of the month (or the Monday following if the date falls on a weekend).

Each branch office handles automatic savings for its own clients.

PROSPECTS: Individuals

CLIENT BENEFITS: Establishment of a program to insure savings...No charge for this service...Save time and effort of making transfers each month...Increase profits by moving funds to an interest-bearing savings account...Interest is earned daily.

ADVANTAGES FOR UNION FIRST CLIENTS: No charge for this service...Assurance that the transfer will be made promptly and efficiently.

PRICING: There is no charge for this service.

CROSS-SELL SERVICES: Checking Account
Statement Savings
Golden Savings

BROCHURES AVAILABLE: Saving Plans (Form M-10)

AUTOMATIC PAYMENTS - UNION FIRST LOANS

DESCRIPTION:

Union First will automatically deduct funds from a client's checking account for Union First installment-type loan payments upon standing instructions from our clients.

Typical payments automatically deducted include:

1. Installment payments - Payments on any type of personal loan made through Union First.
2. Mortgage payments - Payments on mortgage loans made through Union First.
3. Executive Banking - Payments for Executive Banking line-of-credit accounts (\$5 for each \$100 borrowed per month with a minimum payment of \$25).
4. Commercial loan payments - Payments on commercial loans made through Union First.

PROSPECTS:

Any personal loan, commercial loan, mortgage loan, or Executive Banking client.

CLIENT

BENEFITS:

No charge for this service...Save time and effort of making payments each month.

ADVANTAGES FOR UNION FIRST

CLIENTS:

Qualified staff to efficiently execute deductions for payments
...Assurance that the deduction will be made promptly and
efficiently...No charge for this service.

PRICING:

There is no charge for this service.

CROSS-SELL SERVICES:

Checking Account
Automatic Savings (Pay Yourself First)
Automatic Bank Deposits
Transfer of Funds by Mail

BROCHURES AVAILABLE:

None

AUTOMATIC PAYMENTS - DRAFTS

DESCRIPTION:

Upon standing instructions from our client and receipt of a debit advice charging the account, Union First will deduct funds from a client's checking account for recurring payments. These debit advices or "drafts" then transfer the funds to the sender in a manner similar to a check.

Types of payments include insurance premiums, mortgage loan payments at savings and loan associations, and savings accounts at financial institutions other commercial banks.

An authorization form from the client must be on file at the bank before Union First will accept drafts charging his account. These forms are furnished to the client by the company which is to be sending the drafts to Union First.

PROSPECTS:

Any Union First checking account client who makes insurance premium payments, mortgage loan payments, or any other recurring payment.

CLIENT BENEFITS:

No charge for this service...Save time and effort of making payments each month.

ADVANTAGES FOR UNION FIRST CLIENTS:

Qualified staff to efficiently execute deductions for payments
...Assurance that the deduction will be made promptly and efficiently...No charge for this service.

PRICING:

Regular Checking Accounts - Since the service charge is not based on the number of items paid but rather on the average balance in the account, there is no charge for this service.

Special Checking Accounts - 10c per item paid.

Commercial Checking Accounts - Each item paid will be counted as a transaction in computing the service charge.

CROSS-SELL SERVICES:

Checking Account
Automatic Savings (Pay Yourself First)

AUTOMATIC PAYMENTS - DRAFTS
(Continued)

CROSS-SELL
SERVICES:

Automatic Bank Deposits
Transfer of Funds by Mail

BROCHURES
AVAILABLE:

None

TRANSFER OF FUNDS BY MAIL

DESCRIPTION:	<p>Each Union First branch office will automatically transfer funds by Cashier's Check upon standing instructions from our clients. Some examples are transfers for rent, allowance, premium payments, support payments, college, and supplemental income for parents.</p> <p>The amount transferred must remain constant from month to month.</p> <p>For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 23.105.</p>
PROSPECTS:	Individuals, overseas clients, corporations, and banks.
CLIENT BENEFITS:	Facilitates transfer of funds on a regular basis for a nominal fee...Provides legal proof of transfer...Enhances credit position with business associates by assuring that payments are made promptly and efficiently...Frees valuable personnel from making routine transfers and leaves them free to perform profit-oriented functions.
ADVANTAGES FOR UNION FIRST CLIENTS:	Qualified staff to efficiently execute the transfer request ...Nominal charge for the assurance that the transfer will be made promptly and efficiently.
PRICING:	\$2.00 - except when transfers are made from checking to savings or from savings to checking accounts.
CROSS-SELL SERVICES:	Automatic Savings (Pay Yourself First) Transfer of Funds by Wire
BROCHURES AVAILABLE:	None

TRANSFER OF FUNDS BY WIRE - FOREIGN AND DOMESTIC

- DESCRIPTION:** Union First, upon request of our client, will transfer the client's funds to any part of the United States and many points outside of the United States. Requests can be submitted either in writing or by phone. Verbal requests will be honored only if there is sufficient authority on file, positive voice recognition, or if a business is transferring funds to another bank for credit to their own account there. We must have written or wire confirmation following the transfer.
- Client requests for transfers of funds should be directed to the office of domicile of the account.
- For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 22.128.
- PROSPECTS:** Individuals, corporations, correspondent banks, non-profit organizations, unions, and partnerships.
- CLIENT BENEFITS:** Save time and expense of having to make the transfer yourself...Verbal requests can save the time of coming to the bank...Invaluable in making emergency transfers, such as when someone is stranded somewhere and is in need of money.
- ADVANTAGES FOR UNION FIRST CLIENTS:** On-line with the Federal Reserve Bank of Richmond...Correspondent bank relationships make transfer of funds fast and efficient...Transfers may be made by TWX, bank wire, telephone to a major money center correspondent bank, or through the Federal Reserve Bank of Richmond.
- PRICING:** \$5.00 minimum charge (there is a \$1.50 charge on transfers of less than \$1,000 through the Federal Reserve system). The service charge for foreign funds transfers varies from \$5.00 to \$25.00, depending on the amount.

TRANSFER OF FUNDS BY WIRE - FOREIGN AND DOMESTIC

CROSS-SELL
SERVICES:

Checking Account
Transfer of Funds by Mail
Automatic Transfer of Funds

BROCHURES
AVAILABLE:

None

CHECK IMPRINTING

DESCRIPTION:	Each Union First office aids clients in ordering or re-ordering personalized, business, voucher, payroll, and estate checks, and personalized deposit slips. The checks are designed to meet the client's specific needs and come in attractive checkbook covers of the client's choice.
PROSPECTS:	Individuals, proprietorships, partnerships, corporations, estates, and organizations.
CLIENT BENEFITS:	Ease of establishing identification when cashing a check ...Checks simplify payment of bills and provide an accounting record of payment...Nominal cost...Fully personalized styling on checks to comply with client's specifications.
ADVANTAGES FOR UNION FIRST CLIENTS:	We use check suppliers who can insure fast and efficient printing and delivery of the checks...Qualified staff trained in efficiently processing your orders.
PRICING:	Price of the check varies with the type of check used and usually is paid for by an automatic charge to the client's checking account. There is no charge for the personalized deposit slips.
CROSS-SELL SERVICES:	24-hour Banking Statement Savings Automatic Savings (Pay Yourself First) Bank by Mail Executive Banking American Express Gold Card
BROCHURES AVAILABLE:	None

STOP PAYMENT

DESCRIPTION:	<p>Union First, upon the written request (or a telephone call followed by a written request) of the maker of a check, will, in most cases, dishonor payment of that particular check whenever it is presented for payment. The check will be returned to the payee stamped "payment stopped."</p> <p>For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 23.119, and the Tellers Handbook, Chapter 6.103.</p>
PROSPECTS:	Individuals, banks, proprietorships, partnerships, corporations, and organizations.
CLIENT BENEFITS:	<p>Safeguard against a possible loss of funds...Save time and expense of trying to get money back from the payee ...When a check is missing, allows the maker to reissue the check with the assurance that the original check will not also be paid.</p>
ADVANTAGES FOR UNION FIRST CLIENTS:	Qualified staff to efficiently execute the stop payment request.
PRICING:	The price of the service is \$8.00 per request and must be renewed each six months.
CROSS-SELL SERVICES:	
BROCHURES AVAILABLE:	None

NOTARY

DESCRIPTION: Union First has notaries public in each office who can notarize signatures for title applications, power of attorney, affidavits, and other instruments requiring a notary seal.

PROSPECTS: Individuals, non-profit organizations, corporations, partnerships, and lawyers.

CLIENT BENEFITS: Collateral transactions can be handled entirely in one place without seeking an outside notary.

ADVANTAGES FOR UNION FIRST CLIENTS: All types of instruments may be notarized for clients.

PRICING: Notaries may charge both clients and non-clients according to fees set by the Department of Justice--ranging upward from 50c, depending on the document to be notarized.

CROSS-SELL SERVICES: Checking Account
Statement Savings
Golden Savings
Executive Banking
American Express Gold Card
Safe Deposit Box

BROCHURES AVAILABLE: None

PERSONAL LOANS

DESCRIPTION:

Union First makes loans to individuals for any worthwhile purpose. These loans may be obtained in two ways:

1. Unsecured - These are loans in which no security is needed.
2. Secured - These are loans which require some type of security. Security can include savings accounts, certificates of deposit, stocks, and automobiles.

Terms vary up to 24 months depending on the amount of money borrowed. To arrange for a personal loan, the client need only complete a loan application and mail it in or bring it by one of our offices. The application will then be processed and the client notified when it is approved.

The client may make payments through an automatic charge to his Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 19.115 and 26, and the Consumer Loan Policy and Procedures Manual.

PROSPECTS:

Individuals

CLIENT BENEFITS:

Easy financing which enables the client to achieve his goals immediately without having to wait until enough money is saved...Enhances credit reputation...Repayment schedule designed to meet the client's needs...Money management made easier by automatic repayment from checking or savings account...Client may choose to purchase credit life and/or accident and health insurance for any personal loan up to \$10,000 for a maximum of five years.

ADVANTAGES FOR UNION FIRST CLIENTS:

Competitive interest rates...Servicing of the loan by highly trained personnel...Terms to meet client's needs...Payments



PERSONAL LOANS
(Continued)

ADVANTAGES FOR
UNION FIRST
CLIENTS:

may be made through an automatic charge to client's Union First checking account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

CROSS-SELL
SERVICES:

Automatic Payments
Checking Account
24-hour Banking
Other Personal Loans
Home Improvement Loans
Automobile Loans
Boat Loans
Recreational Vehicle and Equipment Loans
Executive Banking
American Express Gold Card
Statement Savings
Golden Savings
Safe Deposit Box

BROCHURES
AVAILABLE:

None

AUTOMOBILE LOANS

DESCRIPTION:

Union First makes direct loans to individuals for the purpose of purchasing automobiles. We finance 75 percent of the purchase price at competitive rates. Terms for new automobile loans are up to 48 months. Terms for used automobile loans vary from 18 to 30 months depending on the type and age of the automobile being purchased.

The client may make payments through an automatic charge to his Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

To arrange for an automobile loan, the client need only complete a loan application and mail it in or bring it by one of our offices. The application will then be processed and the client notified when it is approved.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 19.115 and 26 and the Consumer Loan Policy and Procedures Manual.

PROSPECTS:

Individuals, partnerships, corporations, and non-profit organizations.

CLIENT

BENEFITS:

Competitive interest rates...Terms to meet the client's needs...Enhanced credit reputation...Easily applied for either by mail or by visiting one of our banking offices...Convenience and enjoyment of having and using the automobile now without having to wait until enough money is saved to make the purchase...Client may choose to purchase credit life and/or accident and health insurance for any personal loan up to \$10,000 for a maximum of five years.

ADVANTAGES FOR

UNION FIRST

CLIENTS:

Competitive rates...Terms designed to fit the client's needs...Experienced personnel to service loan...Payments may be made through an automatic charge to Union First checking or savings account, by mail, through our 24-hour banking machines, or in person at one of our banking offices.

AUTOMOBILE LOANS (Continued)

CROSS-SELL SERVICES:

Automatic Payments
Checking Account
24-hour Banking
Home Improvement Loans
Boat Loans
Recreational Vehicle and Equipment Loans
Personal Loans
Statement Savings
Golden Savings
Executive Banking
American Express Gold Card

BROCHURES AVAILABLE:

Auto Loans (M-20)

HOME IMPROVEMENT LOANS

DESCRIPTION:

Union First provides financing for all types of improvements on residential homes. This may range from remodeling to renovating to redecorating. It includes most any permanent improvement, up to an expenditure of \$35,000 (up to \$10,000 insured by FHA). Terms vary up to ten years depending on the amount of money borrowed, and second trust deeds may be required.

To arrange for a home improvement loan, the client need only complete a loan application and mail it in or bring it by one of our offices. The application will then be processed and the client notified when it is approved. Or if the client prefers, he may apply for FHA insured, home improvement financing through any of our authorized dealers. Please refer to the list in our brochure, "Home Improvement Loans." The client may make payments through an automatic charge to his Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

For further policies and instructions pertaining to this service, see the Policies and Instructions Manual, Chapter 19.115 and 26 and the Consumer Loan Policy and Procedures Manual.

PROSPECTS:

Individuals

CLIENT

BENEFITS:

A chance to make nearly any type of home improvement with the aid of a low-rate bank loan...Easily applied for by mail or by visiting one of our convenient banking offices...Client may choose to purchase credit life and/or accident and health insurance for any personal loan up to \$10,000 for a maximum of five years.

ADVANTAGES FOR UNION FIRST CLIENTS:

One of a few banks in the area that makes FHA insured loans...Terms to meet the client's needs...Loan application may

HOME IMPROVEMENT LOANS (Continued)

ADVANTAGES FOR UNION FIRST CLIENTS:

either be mailed in or brought in to one of our banking offices...Competitive lending rates...Payments may be made through an automatic charge to the client's Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

CROSS-SELL SERVICES:

Automatic Payments
Checking Account
24-hour Banking
Automobile Loans
Boat Loans
Recreational Vehicle and Equipment Loans
Personal Loans
Executive Banking
American Express Gold Card
Statement Savings
Golden Savings

BROCHURES AVAILABLE:

Home Improvement Loans (Form M-16)

BOAT FINANCING

DESCRIPTION: Union First provides financing for various types and sizes of boats and motors.

Types of boats and motors financed are:

1. Outboard motor boats from small-engine to large twin-engine craft.
2. Inboard/outboard boats of varying sizes with engines of corresponding horsepower.
3. Motors for outboard boats of varying horsepower ratings.
4. Sailing craft of varying types and sizes.
5. Trailers to transport the various boats.

We finance 75 percent of the purchase price and terms vary up to seven years depending on the model year and cost of the boat or boat rig financed.

To arrange for a boat loan, the client needs to complete a loan application and mail it in or bring it by one of our offices. (He must also furnish a financial statement and any other pertinent information to qualify for credit approval.) The application will then be processed and the client notified when it is approved.

The client may make payments through an automatic charge to his Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapters 19.115 and 26 and the Consumer Loan Policy and Procedures Manual.

PROSPECTS: Individuals, proprietorships, partnerships, corporations, and associations.

UNION¹ST

BOAT FINANCING (Continued)

CLIENT BENEFITS:

Easy financing for a luxury item which the client may desire, but not able to pay for in cash...Repayment schedule designed to fit client's needs...Client may choose to purchase credit life and/or accident and health insurance for any personal loan up to \$10,000 for a maximum of five years.

ADVANTAGES FOR UNION FIRST CLIENTS:

Competitive interest rates...Loan serviced by highly trained personnel...Loans tailored to fit the client's needs...Payments may be made through automatic charge to client's Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

CROSS-SELL SERVICES:

Automatic Payments
Checking Account
24-hour Banking
Home Improvement Loans
Automobile Loans
Recreational Vehicle and Equipment Loans
Personal Loans
Executive Banking
American Express Gold Card
Statement Savings
Golden Savings

BROCHURES AVAILABLE:

None

RECREATIONAL VEHICLE AND EQUIPMENT FINANCING

DESCRIPTION:

Union First makes direct loans to individuals for the purpose of purchasing motor homes, travel trailers, and campers. We finance 75 percent of the purchase price at competitive rates. Terms vary up to 84 months depending on type and price of vehicle or equipment financed.

To arrange for a recreational vehicle and equipment loan, the client needs to complete a loan application and mail it in or bring it by one of our offices. He must also furnish a financial statement and any other pertinent information to qualify for credit approval. The application will then be processed and the client notified when it is approved.

The client may make payments through an automatic charge to his Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapters 19, 115 and 26 and the Consumer Loan Policy and Procedures Manual.

PROSPECTS:

Individuals

CLIENT BENEFITS:

Convenience and enjoyment of having and using a luxury item now without having to wait until enough money is saved to make the purchase...Enhance credit reputation by repaying as agreed...Enhance reputation and respect of friends by buying recreational vehicle or equipment...Adds to client's personal image...Client may choose to purchase credit life and/or accident and health insurance for any personal loan up to \$10,000 for a maximum of five years.

ADVANTAGES FOR UNION FIRST CLIENTS:

Competitive rates...Experienced personnel to service loan
...Terms designed to fit the client's needs.

RECREATIONAL VEHICLE AND EQUIPMENT FINANCING (Continued)

CROSS-SELL SERVICES:

Automatic Payments
Checking Account
24-hour Banking
Automobile Loans
Boat Loans
Home Improvement Loans
Personal Loans
Executive Banking
American Express Gold Card
Statement Savings
Golden Savings

BROCHURES AVAILABLE:

None

MOBILE HOME FINANCING

DESCRIPTION:

Union First makes direct loans to individuals for the purpose of purchasing new mobile residences. We finance 75 percent of the purchase price at competitive rates for mobile homes. Financing for new mobile homes has a maximum term of 84 months.

To arrange for mobile home financing, the client needs to complete a loan application and mail it in or bring it by one of our offices. He must also furnish a financial statement and any other pertinent information to qualify for credit approval. The application will then be processed and the client notified when it is approved.

The client may make payments through an automatic charge to his Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapters 19, 115 and 26 and the Consumer Loan Policy and Procedures Manual.

PROSPECTS:

Individuals

CLIENT

BENEFITS:

Convenience and enjoyment of having and using a home now without having to wait until enough money is saved to make the purchase...Expansion of credit position by purchasing on time...Enhance reputation and respect of friends by buying a home...Adds to client's personal image...Client may choose to purchase credit life and/or accident and health insurance for any personal loan up to \$10,000 for a maximum of five years.

ADVANTAGES FOR UNION FIRST CLIENTS:

Competitive rates assure the client of no undue credit costs...Loans designed to fit the client's needs...Payments may be made through an automatic charge to client's Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

MOBILE HOME FINANCING (Continued)

CROSS-SELL SERVICES:

Automatic Payments
Checking Account
24-hour Banking
Automobile Loans
Recreational Vehicle and Equipment Loans
Personal Loans
Executive Banking
American Express Gold Card
Statement Savings
Golden Savings

BROCHURES AVAILABLE:

None

AIRCRAFT FINANCING

DESCRIPTION:

Union First provides financing for the purchase of new or used aircraft to both organizations and individuals. Clients must furnish financial statements and any other pertinent information to qualify for credit approval.

The bank must be furnished insurance coverage with a broad-form loss-payable clause included.

The client may make payments through an automatic charge to his Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapters 18, 115 and 26 and the Consumer Loan Policy and Procedures Manual.

PROSPECTS:

Organizations, corporations, partnerships, proprietorships, and individuals.

CLIENT

BENEFITS:

Financing for a major expenditure...Terms to meet needs.

ADVANTAGES FOR UNION FIRST CLIENTS:

Terms tailored to fit the client's needs...Competitive interest rates...Loans serviced by highly trained personnel
...Payments may be made through an automatic charge to Union First check or savings account, by mail, through our 24-hour banking machines, or in person at one of our banking offices.

CROSS-SELL SERVICES:

Automatic Payment
Checking Account
Executive Banking
American Express Gold Card
Statement Savings
Golden Savings
Golden Savings Certificates
Certificates of Deposit

AIRCRAFT FINANCING
(Continued)

CROSS-SELL
SERVICES:

Safe Deposit Box
All Personal Loans

BROCHURES
AVAILABLE:

None

REAL ESTATE LOANS - FIRST TRUST

DESCRIPTION:

Union First makes loans to individuals for the purpose of purchasing primary residences in the District of Columbia, Maryland, and Virginia within a 50-mile radius of Washington. We will normally finance 70-75 percent of the appraised value up to approximately \$75,000 at competitive rates. The terms for real estate loans are usually 25 years or less, depending on age of property, location, and borrowers ability to make required monthly payments.

Union First is permitted to charge points in the District and Virginia (normally, one point from the buyer in the District and one point each from the buyer and seller in Virginia). We encourage the opening of savings accounts for the accumulation of real estate taxes and insurance premiums; however, we do not undertake the responsibility for making the payments.

To apply for a real estate loan, the client must complete an Application for Real Estate Loan (Form 1273) and submit it along with a current financial statement and a copy of the signed purchase agreement.

The client may make payments through an automatic charge to his Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 27.

PROSPECTS:

Individuals in the market for a residence.

CLIENT BENEFITS:

Terms designed to meet the client's needs... Earn maximum interest on savings deposits while accumulating for taxes and insurance premium payments.



REAL ESTATE LOANS - FIRST TRUST
(Continued)

ADVANTAGES FOR
UNION FIRST
CLIENTS:

Competitive interest rates...Servicing of the loan by highly trained personnel...Terms to meet client's needs...Payments may be made through automatic charge to client's Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices...No monthly escrow payments required...Taxes and insurance premiums can be paid with Executive Banking cash reserve.

CROSS-SELL
SERVICES:

Automatic Payments
24-hour Banking
Checking Account
Statement Savings
Golden Savings
Executive Banking
All Personal Loans

BROCHURES
AVAILABLE:

None

REAL ESTATE LOANS - SECOND TRUST

DESCRIPTION:

Union First makes second trust loans on owner-occupied residences to individuals for almost any worthwhile purpose, and the first trust loan need not be with Union First. The amount of the second trust loan, plus the outstanding balance of the first trust loan, cannot exceed approximately 70-75 percent of the current appraised value of the property. We offer terms to meet the client's needs, up to ten years, and competitive interest rates.

Second trust loans must have:

1. Equal installment payments.
2. No prepayment restrictions after the third year.
3. A non-negotiable clause in the note.

To apply for a real estate loan, the client must complete an Application for Real Estate Loan (Form 1278) and submit it along with a current financial statement.

The client may make payments through an automatic charge to his Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

For further policies and procedures pertaining to this service, see the Policies and Instructions Manual, Chapter 27.

PROSPECTS:

Individuals with an equity in their homes.

CLIENT

BENEFITS:

Can borrow money for taxes, college tuition, home improvements, and for many other purposes...Terms designed to meet the client's needs.

ADVANTAGES FOR UNION FIRST CLIENTS:

Competitive interest rates...Servicing of the loan by highly trained personnel...Terms to meet client's needs...Payments



REAL ESTATE LOANS - SECOND TRUST
(Continued)

ADVANTAGES FOR
UNION FIRST
CLIENTS:

may be made through automatic charge to client's Union First checking or savings account, by mail, through one of our 24-hour banking machines, or in person at one of our banking offices.

CROSS-SELL
SERVICES:

Automatic Payments
24-hour Banking
Checking Account
Statement Savings
Golden Savings
Personal Loans

BROCHURES
AVAILABLE:

Equiloan (Form H-19)

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7 3 0 4 0 3 4 0 4 0

HAMILTON AND HAMILTON

Union Trust Building

WASHINGTON, D. C. 20005

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20004

2002349

COVINGTON & BURLING

888 SIXTEENTH STREET, N.W.

WASHINGTON, D.C. 20006

TELEPHONE

(202) 452-6000

ARTISTS DIRECTORIAL NUMBER

(202) 452-6418

1WX 710-822-0005

TELEX 89 503

CABLE COVING

HAND DELIVERED

December 23, 1977

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

Re: MUR 415 (77)

Dear Mr. Oldaker:

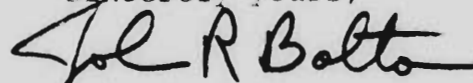
Enclosed herewith are the Answers, under oath, of Mr. I. Lee Potter, Executive Director of the Republican Congressional Boosters Club (hereafter, the "Boosters Club") to Interrogatories propounded to him by the Federal Election Commission. These Interrogatories, enclosed with a cover letter to me, were received on December 13, 1977.

I would like to reiterate the points I made in my letter to you of August 12, 1977. There is just no evidence whatever to support, under any legal theory, the allegation that the Union First National Bank has made a contribution to the Boosters Club. The enclosed Answers to the Commission's Interrogatories, and Mr. Potter's previous statement, demonstrate convincingly that Union First performed only normal banking functions for the Boosters Club.

I trust, as you say in your letter to me of December 9, that it will now be possible for the Commission "to conclude its investigation into this matter expeditiously" by dismissing this Matter Under Review.

If you or Ms. Sulton have any further questions on this subject, please do not hesitate to get in touch with me.

Sincerely yours,


John R. Bolton

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National Bank) MUR 415 (77)
Republican Congressional)
Boosters Club)

ANSWERS OF I. LEE POTTER
TO THE COMMISSION'S INTERROGATORIES

1. What are your duties as Executive Director of Boosters?

A. I am responsible for all matters concerning the day-to-day operation of the Republican Congressional Boosters Club (hereafter, the "Boosters Club"), including but not limited to fundraising activities and determining to which Republican candidates for election to the House and Senate the Boosters Club will make contributions.

2. Describe each savings account, checking account, and any other type of deposit maintained at the Union First National Bank by Boosters from January 1976 to the present date including the number for each such account.

3. For each account described in your answer to Interrogatory # 2 above, state the purpose of the account (e.g., operating expenses account, contributions account, etc.).

A. The following are the Boosters Club's accounts at the Union First National Bank, together with the purposes to which monies from these accounts are put:

Operations Account #3-141-952 -- to pay all administration expenses of Boosters Club operations, including salaries and expenses as well as cost of Boosters Club meetings in various cities in the United States;

Contributions Account #3-506-991 -- to provide funds for candidates for election to the House and Senate;

Certificate of Deposit - #05-011-5-600437 - to pay necessary taxes to the Federal Government and the District of Columbia (monies in this account come from the Contributions Account to draw short and long-term interest);

Interest Account #0-287-776 - to draw interest (monies in this account come from the Savings Account and Certificate of Deposit);

Savings Account #11-115-152 - to draw interest.

4. What specific services have been performed by Ms. June Dean with respect to accounts and certificates of deposit at Union First National Bank?

A. The services performed by Mrs. Dean are set forth in my statement of August 11, 1977.

5. Describe the procedure whereby contributors' checks and acknowledgements are handled from the time a check is received by Boosters, including but not limited to:
- (a) Where is the check received?
 - (b) Who prepares a deposit slip for the check?
 - (c) Who records the name, address, and other information regarding the contributor?
 - (d) Who endorses the check?
 - (e) How is the check delivered to the Bank?
 - (f) Who prepares an acknowledgement letter to the contributor?
 - (g) And if who is named in an acknowledgement letter sent?
 - (h) Is a receipt given to the contributor in addition to or in lieu of a letter? If so, who prepares the receipt, signs it, and mails it to the contributor?

3.

A. The following are the procedures currently utilized by the Boosters Club for receiving contributor's checks and for making acknowledgements:

(a) Checks are received at the Boosters Club's office at 300 First Street, S.E., Washington, D.C., 20003.

(b) Deposit slips are prepared by either Miss Vera F. Lopp or Mrs. Cathy Roth; both are full-time employees of the Boosters Club.

(c) The name, address and other items of contributor information are recorded by either Miss Lopp or Mrs. Roth.

(d) Either Miss Lopp or Mrs. Roth stamps the back of each check "For Deposit Only" to account number 11-115-152.

(e) The checks are mailed to the bank.

(f) Acknowledgement letters are sent over the signature of the Executive Director.

(h) Yes. The receipt is prepared by either Miss Lopp or Mrs. Roth and enclosed with the acknowledgement letter.

6. Who instructs Ms. June Dean to transfer funds, issue checks, and perform other actions with respect to Boosters' accounts and certificates of deposit?

A. I do.

7. Does Ms. Dean have sole signature authority on the accounts identified in your answer to Interrogatory #2? If not, identify the other signatories and describe the combination of signatures which are authorized to sign checks.

A. Only the Operations Account and the Contributions Account are checking accounts.

Checks drawn on the Operations Account are signed by any two of the following: Mr. Edward F. Terrar, Jr., Deputy Executive Director; Miss Lepp; Mrs. Both; or me, as Executive Director.

Checks drawn on the Contributions Account are signed by Mr. David S. Smith. Mr. Smith replaced Mr. Charles Daniel as Treasurer of the Boosters Club on November 15, 1977, and Mrs. Dean has not had signatory power since that time.

8. What services are performed by Mr. Charles Daniel with respect to Boosters' accounts and certificates of deposit at Union First National Bank?

A. Mr. Daniel performs no such services for the Boosters Club. He has advised me from time to time on the interest rates the bank was then paying on certificates of deposit.

9. What services are performed by Mr. Charles Daniel as treasurer of Boosters?

A. As I stated in response to Interrogatory Seven, Mr. Daniel is no longer the Treasurer of the Boosters Club. During the time he was the Treasurer, he carried out the duties of the Treasurer of a political committee as required by the Federal Election Campaign Act.

10. Referring to Exhibit 1 attached hereto, identify the person who prepared the cover letter and accompanying FIC Schedule A forms attached thereto.

A. Exhibit 1 was prepared by Miss Martha Spenger, a former employee of the Boosters Club. Miss Spenger left the employ of the Boosters Club on December 31, 1976.

11. If your answer to Interrogatory #10 above identifies someone not employed by Boosters at the time the report was prepared, explain how that individual had access to the reported information.

A. Miss Spenger was an employee of the Boosters Club at the time Exhibit 1 was prepared.

L. Loe Potter
L. LOE POTTER

SUBSCRIBED AND SWORN TO
before me this 21st day
of December, 1977.

[Signature]

COVINGTON & BURLING

888 SIXTEENTH STREET N.W.

WASHINGTON, D.C. 20006

AG. 55

TELEPHONE

(202) 452-6418

TELETYPE

TELETYPE

CABLE COVING

ADDITIONAL DIRECT DIALING

(202) 452-6418

HAND DELIVERED

December 23, 1977

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

Re: MUR 415 (77)

Dear Mr. Oldaker:

Enclosed herewith are the Answers, under oath, of Mr. I. Lee Potter, Executive Director of the Republican Congressional Boosters Club (hereafter, the "Boosters Club") to Interrogatories propounded to him by the Federal Election Commission. These Interrogatories, enclosed with a cover letter to me, were received on December 13, 1977.

I would like to reiterate the points I made in my letter to you of August 12, 1977. There is just no evidence whatever to support, under any legal theory, the allegation that the Union First National Bank has made a contribution to the Boosters Club. The enclosed Answers to the Commission's Interrogatories, and Mr. Potter's previous statement, demonstrate convincingly that Union First performed only normal banking functions for the Boosters Club.

I trust, as you say in your letter to me of December 9, that it will now be possible for the Commission "to conclude its investigation into this matter expeditiously" by dismissing this Matter Under Review.

If you or Mr. Solton have any further questions on this subject, please do not hesitate to get in touch with me.

Sincerely yours,

John R. Bolton
John R. Bolton

Enclosure

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Union First National Bank)

Republican Congressional)

Boosters Club)

MEK 416 (77)

ANSWERS OF J. LEE FORTHE
TO THE COMMISSION'S INTERROGATORIES

1. What are your duties as Executive Director of Boosters?

A. I am responsible for all matters concerning the day-to-day operation of the Republican Congressional Boosters Club (hereafter, the "Boosters Club"), including but not limited to fundraising activities and determining to which Republican candidates for election to the House and Senate the Boosters Club will make contributions.

2. Describe each savings account, checking account, and any other type of deposit maintained at the Union First National Bank by Boosters from January 1976 to the present date including the number for each such account.

3. For each account described in your answer to Interrogatory # 2 above, state the purpose of the account (e.g., operating expenses account, contributions account, etc.).

A. The following are the Boosters Club's accounts at the Union First National Bank, together with the purposes to which monies from these accounts are put:

Operating Account - This account is used for the administration expenses of Boosters Club operations, including salaries and expenses as well as cost of Boosters Club meetings in various cities in the United States.

Contributions Account #3-506-291 -- to provide funds for candidates for election to the House and Senate;

Certificate of Deposit - #05-011-3-500417 - to pay necessary taxes to the Federal Government and the District of Columbia (monies in this account come from the Contributions Account to draw short and long-term interest);

Interest Account #3-287-776 - to draw interest (monies in this account come from the Savings Account and Certificate of Deposit);

Savings Account #11-115-152 - to draw interest.

4. What specific services have been performed by Mr. Lane Dean with respect to accounts and certificates of deposit at Union First National Bank?

A. The services performed by Mr. Dean are set forth in my statement of August 11, 1977.

5. Describe the procedure whereby contributors' checks and acknowledgements are handled from the time a check is received by Boosters, including but not limited to:

- Where is the check received?
- Who prepares a deposit slip for the check?
- Who records the name, address, and other information regarding the contributor?
- Who endorses the check?
- How is the check delivered to the bank?
- What acknowledgment is returned to the contributor?
- How is the check accounted for in the bank?
- How is the check accounted for in the booster's records?
- How is the check accounted for in the booster's financial statements?

3.

A. The following are the procedures currently utilized by the Boosters Club for receiving contributor's checks and for making acknowledgements:

(a) Checks are received at the Boosters Club's office at 300 First Street, S.E., Washington, D.C., 20003.

(b) Deposit slips are prepared by either Miss Vera E. Lopp or Mrs. Cathy Roth; both are full-time employees of the Boosters Club.

(c) The name, address and other items of contributor information are recorded by either Miss Lopp or Mrs. Roth.

(d) Either Miss Lopp or Mrs. Roth stamps the back of each check "For Deposit Only" to account number 11-113-152.

(e) The checks are mailed to the bank.

(f) Acknowledgement letters are sent over the signature of the Executive Director.

(h) Yes. The receipt is prepared by either Miss Lopp or Mrs. Roth and enclosed with the acknowledgement letter.

6. Who instructs Ms. June Dean to transfer funds, issue checks, and perform other actions with respect to Boosters' accounts and certificates of deposit?

A. I do.

7. Does Ms. Dean have sole signature authority on the accounts identified in your answer to Interrogatory #2? If not, identify the other signatories and describe the combination of signatures which are authorized to sign checks.

A. Only the Operations Account and the Contributions Account are checking accounts.

Checks drawn on the Operations Account are signed by any two of the following: Mr. Edward K. Terrar, Jr., Deputy Executive Director; Miss Lopp; Mrs. Roth; or me, as Executive Director.

Checks drawn on the Contributions Account are signed by Mr. David S. Smith. Mr. Smith replaced Mr. Charles Daniel as Treasurer of the Boosters Club on November 15, 1977, and Mrs. Dean has not had signatory power since that time.

8. What services are performed by Mr. Charles Daniel with respect to Boosters' accounts and certificates of deposit at Union First National Bank?

A. Mr. Daniel performs no such services for the Boosters Club. He has advised me from time to time on the interest rates the bank was then paying on certificates of deposit.

9. What services are performed by Mr. Charles Daniel as Treasurer of Boosters?

A. As Treasurer of the Boosters Club, Mr. Daniel is responsible for the financial affairs of the Boosters Club. During the time he was the Treasurer, he carried out the duties of the Treasurer of a political committee as required by the Federal Election Campaign Act.

2002291

HAMILTON AND HAMILTON
UNION FIRST BANK BUILDING
WASHINGTON, D. C. 20005

RECEIVED
FEDERAL ELECTION
COMMISSION

GEORGE E. HAMILTON SR 1853-1946

TELEPHONE 202-347-2882

'77 DEC 20 AM 11:42

MARYLAND OFFICE
1700 JEFFERSON STREET
BETHESDA, MARYLAND 20850
(301) 340-2551

GEORGE E. HAMILTON
WILLIAM A. GLASGOW
JOHN L. HAMILTON
GEORGE E. HAMILTON III
STEPHEN A. TRIMBLE
RICHARD W. TURNER
NICHOLAS D. WARD
DANIEL V. McEVILY

December 19, 1977

WILLIAM F. BECKER
OF COUNSEL

MEMBER OF THE BAR

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20463

In Re: MUR 415(77)

Dear Mr. Oldaker:

This letter is written to you pursuant to my conversation today with Mrs. Gloria R. Sulton. My partner, Mr. William A. Glasgow, who has been handling this matter on behalf of Mr. Charles Daniel and June Dean, of the Union First National Bank, is ill and the matter has been assigned to me for attention.

I have requested an extension of time to file the answers to the interrogatories of Colonel Daniel and Mrs. Dean. It is my understanding it will be satisfactory if the answers are filed on or before January 3, 1978.

Sincerely yours,



JLH:cb
cc: John R. Bolton, Esq.

FEDERAL ELECTION COMMISSION

Do Not Separate From Document

For Division Use

AC 2299

Suspense No.

703704

Name and Address of Sender

JOHN HAMILTON
UNION ST - PH - BLDG
WASH. D.C.

Subject of Correspondence

Date Received

11/20/77

Suspense Date

01/16/78

Referred to

Action (Optional)

1.

2.

3.

4.

5.

Answer Date

NAN

File Designation

4300

Special Instructions:

HAMILTON AND HAMILTON

UNION FIRST BANK BUILDING
WASHINGTON, D. C. 20004

77 DEC 20 AM 11:10

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20463

MUR 415

Sulton

PS Form 3811, Apr 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items Add your address in the RETURN TO space on reverse								
1 The following service is requested (check one): <input checked="" type="checkbox"/> Show to whom and date delivered _____ <input type="checkbox"/> Show to whom, date, and address of delivery _____ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered _____ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ _____ (CONSULT POSTMASTER FOR FEES)								
2 ARTICLE ADDRESSED TO John R. Bolton, Esquire 888 16th Street N.W. Washington, DC 20006								
3 ARTICLE DESCRIPTION <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td>943445</td> <td></td> </tr> </table>			REGISTERED NO.	CERTIFIED NO.	INSURED NO.		943445	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
	943445							
(Always obtain signature of addressee or agent)								
I have received the article described above. SIGNATURE _____ Addressee <input type="checkbox"/> Authorized agent								
4 DATE OF DELIVERY 12-13-77		POSTMARK						
5 ADDRESS (Complete only if requested)								
6 UNABLE TO DELIVER BECAUSE		CLERK'S INITIALS						



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON D.C. 20563

December 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Bolton, Esquire
Covington & Burling
888 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 415 (77)

Dear Mr. Bolton:

This acknowledges receipt of your letter dated August 12, 1977, on behalf of the Republican Congressional Boosters Club, with the attached affidavit of Mr. I. Lee Potter.

In order to conclude its investigation into this matter expeditiously, the Commission requests that Mr. Potter submit written answers, under oath, to the enclosed interrogatories. A response is requested within ten days after receipt of this letter.

Your continued cooperation is appreciated. If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 523-4057.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Bolton, Esquire
Covington & Burling
838 Sixteenth Street, N.W.
Washington, D.C. 20006

Re: MUR 415 (77)

Dear Mr. Bolton:

This acknowledges receipt of your letter dated August 12, 1977, on behalf of the Republican Congressional Boosters Club, with the attached affidavit of Mr. I. Lee Potter.

In order to conclude its investigation into this matter expeditiously, the Commission requests that Mr. Potter submit written answers, under oath, to the enclosed interrogatories. A response is requested within ten days after receipt of this letter.

Your continued cooperation is appreciated. If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 523-4057.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

12-8-77

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National Bank) MUR 415(77)
Republican Congressional)
Boosters Club)

ORDER

The Federal Election Commission, pursuant to its powers under 2 U.S.C. §437d(a)(1), requires that Mr. I. Lee Potter submit responses in writing to the interrogatories attached hereto. The answers are to be sent to the Commission's offices at 1325 K Street N.W., Washington, D.C. 20463, marked to the attention of the Enforcement Division, Office of the General Counsel. The responses should be made under oath and should be submitted within ten (10) days of receipt of this Order.

12-8-77
Date

Thomas E. Harris
Thomas E. Harris
Chairman
Federal Election Commission

ATTEST:

Margaret W. Emerson
Secretary to the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National Bank) MUR 415(77)
Republican Congressional) Interrogatories
Boosters Club)
)

To : Mr. I. Lee Potter
Executive Director
Republican Congressional Boosters
Club (hereinafter "Boosters")

1. What are your duties as Executive Director of Boosters?
2. Describe each savings account, checking account, and any other type of deposit maintained at the Union First National Bank by Boosters from January 1976 to the present date including the number for each such account.
3. For each account described in your answer to Interrogatory #2 above, state the purpose of the account (e.g., operating expenses account, contributions account, etc.).
4. What specific services have been performed by Ms. June Dean with respect to accounts and certificates of deposit at Union First National Bank?
5. Describe the procedure whereby contributors' checks and acknowledgements are handled from the time a check is received by Boosters, including but not limited to:
 - a. Where is the check received?
 - b. Who prepares a deposit slip for the check?
 - c. Who records the name, address, and other information regarding the contributor?
 - d. Who endorses the check?
 - e. How is the check delivered to the bank?

- f. Who prepares an acknowledgement letter to the contributor?
- g. Under whose name is an acknowledgement letter sent?
- h. Is a receipt given to the contributor in addition to or in lieu of a letter? If so, who prepares the receipt, signs it, and mails it to the contributor?
6. Who instructs Ms. June Dean to transfer funds, issue checks, and perform other actions with respect to Boosters' accounts and certificates of deposit?
7. Does Ms. Dean have sole signature authority on the accounts identified in your answer to Interrogatory #2? If not, identify the other signatories and describe the combination of signatures which are authorized to sign checks.
8. What services are performed by Mr. Charles Daniel with respect to Boosters' accounts and certificates of deposit at Union First National Bank?
9. What services are performed by Mr. Charles Daniel as treasurer of Boosters?
10. Referring to Exhibit 1 attached hereto, identify the person who prepared the cover letter and accompanying FEC Schedule A forms attached thereto.
11. If your answer to Interrogatory #10 above identifies someone not employed by Boosters at the time the report was prepared, explain how that individual had access to the reported information.

MUR 415

Sulton

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER Complete items 1, 2, and 3. Add your address in the RETURN TO space on reverse.								
1. The following service is requested (check one) <input type="checkbox"/> Show to whom and date delivered _____ c <input checked="" type="checkbox"/> Show to whom, date, and address of delivery _____ c <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered _____ c <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ _____ (CONSULT POSTMASTER FOR FEES)								
2. ARTICLE ADDRESSED TO <i>William Sulton</i>								
3. ARTICLE DESCRIPTION <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td></td> <td>945444</td> <td></td> </tr> </table>			REGISTERED NO.	CERTIFIED NO.	INSURED NO.		945444	
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
	945444							
(Always obtain signature of addressee or agent)								
I have received the article described above. SIGNATURE Addressee <input checked="" type="checkbox"/> Authorized agent <i>C. Sulton</i>								
4. DATE OF DELIVERY <i>12-13-77</i>		POSTMARK 						
5. ADDRESS (Complete only if requested) <i>725 - 15th St</i>								
6. UNABLE TO DELIVER BECAUSE		CLERK'S INITIALS						



FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.
WASHINGTON, D.C. 20004

December 9, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William A. Glasgow, Esquire
Hamilton & Hamilton
Union First Building
Washington, DC 20005

Re: MUR 415(77)

Dear Mr. Glasgow:

This acknowledges receipt of your letter dated August 12, 1977, on behalf of the Union First National Bank, with the attached affidavit of Ms. June Dean.

In order to conclude its investigation into this matter expeditiously, the Commission requests that your clients, Mr. Charles Daniel and Ms. Dean, submit written answers, under oath, to the enclosed interrogatories. Your clients' answers are requested within ten days after receipt of this letter.

Your continued cooperation is appreciated. If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, at 523-4057.

Sincerely,

William C. Oldaker
General Counsel

Enclosures



1897

In the Matter of)
)
United First National Bank) MUR 415 (77)
Republican Congressional)
Boosters Club)

ORDER

The Federal Election Commission, pursuant to its powers under 2 U.S.C. §437d(a)(1), requires that Ms. June Dean submit responses in writing to the interrogatories attached hereto. The answers are to be sent to the Commission's offices at 1325 K Street N.W., Washington, D.C. 20463, marked to the attention of the Enforcement Division, Office of the General Counsel. The responses should be made under oath and should be submitted within ten (10) days of receipt of this Order.

12-8-77

Date _____

Thomas E. Harris

Thomas E. Harris

Chairman

Federal Election Commission

ATTEST:

Mary W. Emmons

Secretary to the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National) MUR 415(77)
Bank) INTERROGATORIES
)

To : Ms. June Dean
 Assistant Vice President
 Union First National Bank
 740 15th Street N.W.
 Washington, D.C.

1. How long have you been an assistant vice president at the Union First National Bank?
2. Describe your duties as an assistant vice president.
3. What other positions have you held at Union First National Bank? State appropriate dates for each such position.
4. What is your salary as assistant vice president at Union First National Bank?
5. What services did you perform in 1976 in connection with the accounts and certificates of deposit of the Republican Congressional Boosters Club (hereinafter "Boosters") at Union First National Bank?
6. In 1976, approximately how many hours per week did you spend performing the services described in your answer to Interrogatory #5 above?
7. For how many Boosters' accounts do you have signature authority? Please describe each such account by name, number and purpose.
8. Who instructs you to issue checks and make deposits or transfers with respect to the Boosters' accounts and certificates of deposits at Union First National Bank?

9. Do you perform services for other depositors at Union First National Bank the same as or similar to the services described in your answer to Interrogatory #5 above?
10. If the answer to Interrogatory #9 above is yes, state the number of accounts other than Boosters' for which you perform such services.
11. Has Boosters ever been required to maintain a "compensating balance" in order to receive the services you perform for it? If so, describe such requirements.
12. Were customers other than Boosters required to maintain "compensating balances" in 1976 in order to receive services the same as or similar to those set forth in your answer to Interrogatory #5? If so, describe such requirements.
13. Describe the types of customers for which Union First National Bank "customarily" offers services the same as or similar to those set forth in your answer to Interrogatory #5 above.
14. What are the criteria used by the Union First National Bank to determine which customers are offered services the same as or similar to those set forth in your answer to Interrogatory #5 above?
15. Who usually assigns customers and their accounts to you?
16. What is the name and position of your immediate supervisor?
17. How long have you provided services for Boosters'

accounts and certificates of deposit at Union First National Bank?

18. What constitutes "a good account" as stated on page 1, paragraph 2, of your affidavit dated August 11, 1977, and submitted to the Commission in this matter?
19. Referring to Exhibit 1 attached hereto, did you prepare the cover letter and accompanying FEC Schedule A forms attached hereto? If not, who prepared the letter and forms?
20. Have you had occasion to submit other reports or letters on behalf of Boosters similar to the attached Exhibit 1? If so, describe each such submission by date and type of report.
21. Do you prepare receipts for contributors to Boosters? If so, are such receipts mailed by the Union First National Bank?
22. Are the services set forth in your answer to Interrogatory #5 above performed during your normal working hours at Union First National Bank?
23. If you prepared the report in the attached Exhibit 1, from whom did you receive the information contained in the report?
24. Has the Union First National Bank ever given you written guidelines on the types of services you may provide to customers? If so, attach a copy of said guidelines to your answers to these interrogatories.
25. Did you receive written instructions on the type of services you were to perform on behalf of Boosters accounts and certificates of deposit? If so, attach a

INTERROGATORIES
MUR 415
Dean - Page 4

copy of said instructions to your answers to these
interrogatories. If not, from whom did you receive
guidance as to the specific services you could per-
form with respect to accounts and deposits maintained
by Boosters?

7304110406

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National Bank) MUR 415(77)
Republican Congressional)
Boosters Club)

ORDER

7804107
The Federal Election Commission, pursuant to its powers under 2 U.S.C. §437d(a)(1), requires that Mr. Charles Daniel submit responses in writing to the interrogatories attached hereto. The answers are to be sent to the Commission's offices at 1325 K Street N.W., Washington, D.C. 20463, marked to the attention of the Enforcement Division, Office of the General Counsel. The responses should be made under oath and should be submitted within ten (10) days of receipt of this Order.

12-8-77
Date

Thomas E. Harris
Thomas E. Harris
Chairman
Federal Election Commission

ATTEST:

Margaret W. Enmons
Secretary to the Commission

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 415(77)
Union First National Bank) INTERROGATORIES
)

To : Charles Daniel
President
Union First National Bank
740 15th Street N.W.
Washington, D.C.

1. State the length of time you have held your present position with the Union First National Bank.
2. What services do you perform on behalf of the Republican Congressional Boosters Club (hereinafter "Boosters") as its treasurer?
3. In your capacity as President of Union First National Bank, what services did you perform in 1976 in connection with Boosters' accounts and certificates of deposits?
4. In 1976, how many hours per week did you spend performing the services described in your answers to Interrogatories #2 and #3?

5. For how many Boosters' accounts do you have signature authority? Describe each such account by number and purpose.

6. Who instructs you to issue checks and make deposits or transfers with respect to the Boosters' accounts and certificates of deposit maintained at Union First National Bank? Are such instructions given in writing or orally? If in writing, attach copies to your answers to these interrogatories.

7. What services were performed in 1976 by Ms. June Dean, assistant vice president at Union First National Bank,

INTERROGATORIES
MUR 415
Daniel - Page 2

with respect to Boosters' accounts and certificates of deposit at Union First National Bank?

8. When did you assign Ms. Dean to service the Boosters' accounts?
9. Is Boosters required to maintain a "compensating balance" in order to receive the services performed by Ms. Dean or other officers or employees of the Union First National Bank? If so, describe such requirements.
10. Were depositors other than Boosters required to maintain "compensating balances" in 1976 in order to receive services the same as or similar to those services rendered by Ms. Dean with respect to Boosters' accounts and certificates of deposit? If so, describe such requirements.
11. Describe the types of customers for which Union First National Bank "customarily" offers the types of services set forth in your answer to Interrogatory #7 above?

12. How many customers in 1976 received services from an employee or officer of the Union First National Bank the same as or similar to those services described in your answer to Interrogatory #7 above?

13. In 1976, how many officers and employees of Union First National Bank performed services for customers which were the same as or similar to those services performed by Ms. Dean on behalf of Boosters?

14. What criteria are used by Union First National Bank to determine whether a depositor will be offered services the same as or similar to those set forth in

your answer to interrogatory #7 above?

15. Does the Union First National Bank have written guidelines or other published material which describes the services offered to depositors? If so, attach a copy of such guidelines or material to your answers to these interrogatories.
16. In your absence, what officers or employees of Union First National Bank have authority to perform your duties as Treasurer of Boosters?
17. Referring to Exhibit 1 attached hereto, did you authorize Ms. Dean to sign the cover letter? Did you authorize Ms. Dean to prepare the report?
18. If Ms. Dean did not prepare the report in attached Exhibit 1, identify the person who prepared said report.
19. Did you or other officers or employees of Union First National Bank prepare acknowledgement letters to Boosters' contributors in 1976?
20. Do you sign acknowledgement letters to Boosters' contributors that are prepared by someone other than you or employees of Union First National Bank? If so, identify the person(s) who prepare and submit the letters to you for signature.
21. Are the services described in answer to interrogatories #2 and #3 performed by you during normal working hours at Union First National Bank? If not, state when such services are performed.



FEDERAL ELECTION COMMISSION

125 K STREET, N.W.
WASHINGTON, D.C. 20541

December 8, 1977

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: ISSUANCE OF ORDERS IN RELATION TO MUR 415 (77)

The attached Orders, approved on a 24 hour no objection basis, have been signed and sealed this date.

Attachments

73340011073



FEDERAL ELECTION COMMISSION

1325 K STREET, N.W.
WASHINGTON, D.C. 20546

December 7, 1977

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
SUBJECT: MUR 415 (77) - Approval of Orders and
Interrogatories

The above-mentioned documents were circulated to the
Commissioners on December 5, 1977.

No objections were received to the Orders and Interrogatories
to be sent to Ms. June Dean, Mr. Charles Daniel and Mr. I Lee Potter.

77041034077

December 2, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 415

Please have the attached letters and interrogatories
in MUR 415 circulated to the Commission on a 24 hour no-
objection basis, as per the Commission's request.

Thankkyou.

78040034078

MEMORANDUM

TO : The Commission
FROM : William Oldaker
RE : MUR 415(77)

File

On October 19, 1977, the Commission voted to send interrogatories in the above matter, in lieu of taking depositions. In accordance with the Commission's determination, the attached Orders and Interrogatories to Ms. June Dean, Mr. Charles Daniel and Mr. I Lee Potter are submitted for review. If no objections are noted within 24 hours, the Orders will be sent.

100-47070-100



FEDERAL ELECTION COMMISSION

1155 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

John R. Bolton, Esquire
Covington & Burling
888 Sixteenth Street N.W.
Washington, DC 20006

Re: MUR 415(77)

Dear Mr. Bolton:

This acknowledges receipt of your letter dated August 12, 1977, on behalf of the Republican Congressional Boosters Club, with the attached affidavit of Mr. I. Lee Potter.

In order to conclude its investigation into this matter expeditiously, the Commission requests that Mr. Potter submit written answers, under oath, to the enclosed interrogatories. A response is requested within fifteen days after receipt of this letter.

Your continued cooperation is appreciated. If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, on 523-4057.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure



7 3 1 4 1 0 1 1 0 3
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Union First National Bank) MUR 415(77)
Republican Congressional) Interrogatories
Boosters Club)
)

To : Mr. I. Lee Potter
Executive Director
Republican Congressional Boosters
Club (hereinafter "Boosters")

1. What are your duties as Executive Director of Boosters?
2. Describe each savings account, checking account, and any other type of deposit maintained at the Union First National Bank by Boosters from January 1976 to the present date including the number for each such account.
3. For each account described in your answer to Interrogatory #2 above, state the purpose of the account (e.g., operating expenses account, contributions account, etc.).
4. What specific services have been performed by Ms. June Dean with respect to accounts and certificates of deposit at Union First National Bank?
5. Describe the procedure whereby contributors' checks and acknowledgements are handled from the time a check is received by Boosters, including but not limited to:
 - a. Where is the check received?
 - b. Who prepares a deposit slip for the check?
 - c. Who records the name, address, and other information regarding the contributor?
 - d. Who endorses the check?
 - e. How is the check delivered to the bank?

- f. Who prepares an acknowledgement letter to the contributor?
 - g. Under whose name is an acknowledgement letter sent?
 - h. Is a receipt given to the contributor in addition to or in lieu of a letter? If so, who prepares the receipt, signs it, and mails it to the contributor?
- 6. Who instructs Ms. June Dean to transfer funds, issue checks, and perform other actions with respect to Boosters' accounts and certificates of deposit?
- 7. Does Ms. Dean have sole signature authority on the accounts identified in your answer to Interrogatory #2? If not, identify the other signatories and describe the combination of signatures which are authorized to sign checks.
- 8. What services are performed by Mr. Charles Daniel with respect to Boosters' accounts and certificates of deposit at Union First National Bank?
- 9. What services are performed by Mr. Charles Daniel as treasurer of Boosters?
- 10. Referring to Exhibit 1 attached hereto, identify the person who prepared the cover letter and accompanying FEC Schedule A forms attached thereto.
- 11. If your answer to Interrogatory #10 above identifies someone not employed by Boosters at the time the report was prepared, explain how that individual had access to the reported information.

EXHIBIT 1

REPUBLICAN CONGRESSIONAL
400 First Street, S.E.

WASHINGTON, D.C. 20003

OCT 29 1976

Honorary Chairman
Vice President Nelson Rockefeller

October 29, 1976

Chairman
Bob Dole, M.C.

Co-Chairman
Mrs. P. J. Morris
Mrs. John F. Lewis
Mrs. C. J. Thomas
Mrs. C. J. Sennels

Chairman
Federal Election Commission
1925 K Street, N.W.
Washington, D.C. 20463

Executive Director
J. Lee Papp
Cable Center, Arizona

Dear Mr. Chairman:

Attached is a list of individuals who have contributed \$1,000.00 or more to the Republican Congressional Boosters Club since our pre-election report was submitted.

Sincerely,

James A. Dean
James A. Dean
Designated Agent to Treasurer

Treasurer
Charles E. Frost
Union First National Bank
of Washington
Washington, D.C.

JAD:ms

Model A

Form 1042

U.S. Department of the Treasury

Washington, D.C. 20548

Domestic Receipts,
Contributions, Net Proceeds, Loans,
Debits, and Transfers for Line
Numbers 18, 19, 20 and/or 21 of FPC Form 3
(See instructions on back)

RECEIVED OCT 9 1976

Page 1 of 1

AMOUNT

11/1/76

Name of Donor, or Committee, or Club

Republican Congressional Boosters Club

76 0 0 3 11:33

Address, including zip code

Mrs. Robert S. Egan
34 Baltimore Estates
Phoenix, Arizona 85016

Occupation, if any

none

Housewife

Check or cash, or other form

Amount received

\$1,000.00

10-20-76 \$1,000.00

Name, including town and zip code

Mr. Earl Sween
2440 Old Beach Road
Wayzata, Minnesota

Occupation, if any

Stewart Sandwiches
16101 West 78th St.

Eden Prairie, Minn. 55343

Chairman of the Board

Check or cash, or other form

Amount received

\$1,000.00

10-20-76 \$1,000.00

Name, including town and zip code

Mr. John B. Trevor, Jr.
15 East 90th St.
New York, New York 10028

Occupation, if any

address above

Estate Management

Check or cash, or other form

Amount received

\$1,000.00

10-20-76 \$1,000.00

Name, including town and zip code

Mr. A. James Clark
1970 Delray Avenue
Bethesda, Maryland 20814

Occupation, if any

George Hyman Construction Co.
address above

President

Check or cash, or other form

Amount received

\$1,000.00

10-21-76 \$1,000.00

Name, including town and zip code

Mr. Gordon Gray
1314 15th Street, N.W.
Washington, D. C. 20004

Occupation, if any

1010 15th Street N.W.
Washington, D. C. 20004

Consultant

Check or cash, or other form

Amount received

\$3,000.00

10-21-76 \$3,000.00

Name, including town and zip code

Mr. W. P. E. Branner
381 California Street
San Francisco, California 94108

Occupation, if any

none

Retired

Check or cash, or other form

Amount received

\$1,000.00

10-22-76 \$1,000.00

Name, including town and zip code

Name, including town and zip code

Name, including town and zip code

Name, including town and zip code

Name, including town and zip code

Name, including town and zip code

Name, including town and zip code

Name, including town and zip code

Name, including town and zip code

Name, including town and zip code

Schedule A

January 1976

Official Publication of the

Internal Revenue Service

Washington, D.C. 20548

**Normalized Receipts,
Contributions, Market Purchases, Loans,
Robots, and Transfers Via Mail
Numbers 16, 17, 18 and/or 19 of REG Form 3
(See Instructions on Form 3)**

Page 2 of 3

AMOUNT

How much of the amount is for the

Normalized Contribution or Contribution

Republican Congressional Boosters Club

10-26-76 51,000.00

Mrs. Harrison Chandler

301 Shasta Wood Drive
Arcadia, California 91006

Chandis Securities Co.
950 So. Flower - Suite 1037
Los Angeles, Calif. 90071

President & Chairman of the Board

10-26-76 51,000.00

Mrs. Raymond E. Cox

2-45 E Street, N.W.
Washington, D. C. 20005

10-26-76 51,000.00

none

housewife

10-26-76 51,000.00

Mrs. F. Trubee Davison

Pelcock Point
Lunar Valley, L. I., New York 11540

10-26-76 51,000.00

none

Housewife

10-26-76 51,000.00

Mr. William H. Doheny

125 El Camino Drive
Beverly Hills, California 90212

10-26-76 51,000.00

4801 Woodwood Avenue
Los Angeles, Calif. 90066

Investments

10-26-76 51,000.00

Mr. and Mrs. J. Korman

2006 Washington Street
San Francisco, California 94109

10-26-76 51,000.00

Arthur Corp.

5-20-76
San Francisco, Calif.

Executive - Mrs. - Housewife

10-26-76 51,000.00

10-26-76 51,000.00
10-26-76 51,000.00
10-26-76 51,000.00

10-26-76 51,000.00

10-26-76 51,000.00
10-26-76 51,000.00

10-26-76 51,000.00

10-26-76 51,000.00

Module A

Form 1076

U.S. Election Commission

200 W. 50th St., N.W.

Atlanta, GA 30301

Memorandum Receipts, Contributions, Ticket Purchases, Loans, Debates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEG Form 3 (See instructions on back)

Page 3 of 4

LINE NUMBER

(This receipt is attached to the contribution record)

Name of Candidate or Committee on file

Republican Congressional Boosters Club

Full Name - including address and ZIP code

Mr. G. T. Pileger

26 Harbor Island

Newport Beach, California 92660

Business or other address

none

Occupation

Retired

Check one box indicating the type of contribution

Amount received in cash

\$1,000.00

Date received

10-26-76 \$1,000.00

Full Name - including address and ZIP code

Mr. Herbert E. Sargent

55 Banock Road

Stillwater, Maine 04489

Business or other address

H. E. Sargent Inc.

address above

Construction

\$1,000.00

Date received

10-26-76 \$1,000.00

Full Name - including address and ZIP code

Mr. Robert D. Stuart, Jr.

345 Merchandise Mart

Chicago, Illinois 60654

Business or other address

The Quaker Oats Co.

address above

Chairman of the Board

\$1,000.00

Date received

10-27-76 \$1,000.00

Full Name - including address and ZIP code

Mrs. Rae A. Wheeler

1117 Strong Drive

Las Vegas, Nevada 89102

Business or other address

none

Housewife

\$1,000.00

Date received

10-27-76 \$1,000.00

Full Name - including address and ZIP code

Mrs. George W. Perkins

One East 68th Street

New York, New York 10021

Business or other address

none

Housewife

\$1,000.00

Date received

10-28-76 \$1,000.00



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William A. Glasgow, Esquire
Hamilton & Hamilton
Union First Building
Washington, DC 20005

Re: MUR 415(77)

Dear Mr. Glasgow:

This acknowledges receipt of your letter dated August 12, 1977, on behalf of the Union First National Bank, with the attached affidavit of Ms. June Dean.

In order to conclude its investigation into this matter expeditiously, the Commission requests that your clients, Mr. Charles Daniel and Ms. Dean, submit written answers, under oath, to the enclosed interrogatories. Your clients' answers are requested within ten days after receipt of this letter.

Your continued cooperation is appreciated. If you have any questions, please contact Gloria R. Sulton, the attorney assigned to this matter, at 523-4057.

Sincerely,

William C. Oldaker
General Counsel

Enclosures



INTERROGATORIES

MUR 415

Dean - Page 2

9. Do you perform services for other depositors at Union First National Bank the same as or similar to the services described in your answer to Interrogatory #5 above?
10. If the answer to Interrogatory #9 above is yes, state the number of accounts other than Boosters' for which you perform such services.
11. Has Boosters ever been required to maintain a "compensating balance" in order to receive the services you perform for it? If so, describe such requirements.
12. Were customers other than Boosters required to maintain "compensating balances" in 1976 in order to receive services the same as or similar to those set forth in your answer to Interrogatory #5? If so, describe such requirements.
13. Describe the types of customers for which Union First National Bank "customarily" offers services the same as or similar to those set forth in your answer to Interrogatory #5 above.
14. What are the criteria used by the Union First National Bank to determine which customers are offered services the same as or similar to those set forth in your answer to Interrogatory #5 above?
15. Who usually assigns customers and their accounts to you?
16. What is the name and position of your immediate supervisor?
17. How long have you provided services for Boosters'

INTERROGATORIES

MUR 415

Dean - Page 3

accounts and certificates of deposit at Union First National Bank?

18. What constitutes "a good account" as stated on page 1, paragraph 2, of your affidavit dated August 11, 1977, and submitted to the Commission in this matter?
19. Referring to Exhibit 1 attached hereto, did you prepare the cover letter and accompanying FEC Schedule A forms attached hereto? If not, who prepared the letter and forms?
20. Have you had occasion to submit other reports or letters on behalf of Boosters similar to the attached Exhibit 1? If so, describe each such submission by date and type of report.
21. Do you prepare receipts for contributors to Boosters? If so, are such receipts mailed by the Union First National Bank?
22. Are the services set forth in your answer to Interrogatory #5 above performed during your normal working hours at Union First National Bank?
23. If you prepared the report in the attached Exhibit 1, from whom did you receive the information contained in the report?
24. Has the Union First National Bank ever given you written guidelines on the types of services you may provide to customers? If so, attach a copy of said guidelines to your answers to these interrogatories.
25. Did you receive written instructions on the type of services you were to perform on behalf of Boosters accounts and certificates of deposit? If so, attach a

INTERROGATORIES

MUR 415

Dean - Page 4

copy of said instructions to your answers to these interrogatories. If not, from whom did you receive guidance as to the specific services you could perform with respect to accounts and deposits maintained by Boosters?

EXHIBIT 1

REPUBLICAN CONGRESSIONAL BOOSTERS CLUB
300 First Street, S.E.

October 29, 1976

Vice-Chairman
Vice President Nelson Rockefeller

Chairman
244 Wilson, N.E.

Co-Chairman
Mrs. Jo Althoff
Mrs. John I. Lunt
Mrs. Gloria Rogers
Mrs. Clara Randall

Chairman
Federal Election Commission
1125 K Street, N.W.
Washington, D. C. 20463

Dear Mr. Chairman:

Attached is a list of individuals who have contributed \$1,000.00 or more to the Republican Congressional Boosters Club since our pre-election report was submitted.

Sincerely,

James A. Dean
James A. Dean
Designated agent to Treasurer

Treasurer
Charles D. Good
United First National Bank
Washington, D.C.

JAD:ms

RECEIVED OCT 3 1976

Module A

July 1976

U.S. HOUSE OF REPRESENTATIVES

U.S. HOUSE OF REPRESENTATIVES

U.S. HOUSE OF REPRESENTATIVES

Standard Committee,
Contributions, Ticket Purchases, Loans,
Debates, and Transfers for Miss.
Numbers 13, 17, 17 and/or 13 of P23 Term 3.
If a letter is typed in the

10-20-76 11:00 AM

11:00 AM

Name of Contributor (as printed on the

Republican Congressional Boosters Club

10-20-76 11:00 AM

Address (as printed on the 2nd card)

Mr. Robert S. Fihn
34 Billmore Estates
Phoenix, Arizona 85016

10-20-76 11:00 AM

Occupation (as printed on the 2nd card)

none

Housewife

U.S. HOUSE OF REPRESENTATIVES

U.S. HOUSE OF REPRESENTATIVES

\$1,000.00

Address (as printed on the 2nd card)

Mr. Earl Sween
2440 Old Beach Road
Wayzata, Minnesota

10-20-76 11:00 AM

Stewart Sandwiches
15101 West 78th St.

Chairman of the Board

Eden Prairie, Minn. 55343

\$1,000.00

Mr. John B. Trevor, Jr.

15 East 90th St.

New York, New York 10028

10-20-76 11:00 AM

Address above

Estate Management

U.S. HOUSE OF REPRESENTATIVES

U.S. HOUSE OF REPRESENTATIVES

\$1,000.00

Mr. A. James Clark

4930 Delray Avenue

Baltimore, Maryland 21014

10-21-76 11:00 AM

George Hyman Construction Co.

Address above

President

U.S. HOUSE OF REPRESENTATIVES

U.S. HOUSE OF REPRESENTATIVES

\$1,000.00

Mr. Gordon Gray

1526- 30th Street, N.W.

Washington, D. C. 20005

10-21-76 11:00 AM

Mr. H. S. S. S. S.

Washington, D. C. 20005

Consultant

U.S. HOUSE OF REPRESENTATIVES

U.S. HOUSE OF REPRESENTATIVES

\$1,000.00

Mr. F. E. S. S. S.

California Street

San Francisco, California 94105

10-22-76 11:00 AM

none

Retired

U.S. HOUSE OF REPRESENTATIVES

U.S. HOUSE OF REPRESENTATIVES

\$1,000.00

Schedule A

January 1976

Schedule A (Form 1041) 1976

U.S. Department of the Treasury

Washington, D.C. 20548

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Refunds, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of Form 990
(See instructions on Form 990)

Page 2 of 3

AGREEMENT

This agreement is subject to the rules and regulations of the Internal Revenue Service.

Name of Contributor (or Donor, if applicable)

Republican Congressional Boosters Club

Address (or mailing address, if different)

Mr. Harrison Chandler
3411 Mission Wood Drive
Arcadia, California 91006

10-26-76 \$1,000.00

Chandia Securities Co.
555 So. Flower - Suite 1037
Los Angeles, Calif. 90071

President & Chairman of the Board

\$1,000.00

Mrs. Raymond E. Cox
2324 S Street, N.W.
Washington, D. C. 20008

10-26-76 \$1,000.00

Name

housewife

\$1,000.00

Mrs. F. Trubee Davison
Pond's Point
Larch Valley, L.I., New York 11560

10-26-76 \$1,000.00

Name

Housewife

\$1,000.00

Mr. William M. Doherty
13 El Camino Drive
Beverly Hills, California 90212
4631 Redwood Avenue
Los Angeles, Calif. 90068

Investments

10-26-76 \$1,000.00

\$1,000.00

Mr. and Mrs. J. Homes
200 Washington Street
San Francisco, California 94107

10-26-76 \$1,000.00

Executive - Mrs. - Housewife
1000 1st St.
San Francisco, Calif.

\$1,000.00

Mr. Gary M. McGuire
1222 First National Bank Bldg.
2700 N. Texas 75203

10-26-76 \$1,000.00

Mr. and Mrs. J. C. Co.
At home above

President

\$1,000.00

Name

\$

Total (See instructions on Form 990)

\$

Module A

Form 1041
 Instructions for Beneficiaries of
 Trusts, Estates, and
 Estates of Deceased

Memorandum
 Contributions, Waiver Payments, Loans,
 Rebates, and Transfers for
 Numbers 16, 17 and/or 18 of Form 990
 (See instructions on page 1)

Page 3 of 3

LINE NUMBER

Use separate sheet for each
 contribution.

Name of the organization or individual

Republican Congressional Boosters Club

Mr. G. T. Pflager

26 Harbor Island

Marina Del Rey, California 92660

none

Retired

10-26-76 \$1,000.00

\$1,000.00

Name, address, and ZIP code

Mr. Herbert E. Sargent

55 Seneca Road

Stillwater, Maine 04489

H. E. Sargent Inc.

address above

Construction

10-26-76 \$1,000.00

\$1,000.00

Mr. Robert D. Stuart, Jr.

145 Merchandise Mart

Chicago, Illinois 60654

The Lumber Data Co.

address above

Chairman of the Board

10-27-76 \$1,000.00

\$1,000.00

Mrs. Rae A. Wheeler

1017 Strong Drive

Las Vegas, Nevada 89102

none

Housewife

10-27-76 \$1,000.00

\$1,000.00

Mrs. George W. Perkins

One East 60th Street

Manhasset Neck, New York 11030

none

Housewife

10-28-76 \$1,000.00

\$1,000.00

7 3 3 4 0 0 3 4 0 0 1
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 415(77)
Union First National Bank) INTERROGATORIES
)

To : Charles Daniel
President
Union First National Bank
740 15th Street N.W.
Washington, D.C.

1. State the length of time you have held your present position with the Union First National Bank.
2. What services do you perform on behalf of the Republican Congressional Boosters Club (hereinafter "Boosters") as its treasurer?
3. In your capacity as President of Union First National Bank, what services did you perform in 1976 in connection with Boosters' accounts and certificates of deposits?
4. In 1976, how many hours per week did you spend performing the services described in your answers to Interrogatories #2 and #3?
5. For how many Boosters' accounts do you have signature authority? Describe each such account by number and purpose.
6. Who instructs you to issue checks and make deposits or transfers with respect to the Boosters' accounts and certificates of deposit maintained at Union First National Bank? Are such instructions given in writing or orally? If in writing, attach copies to your answers to these interrogatories.
7. What services were performed in 1976 by Ms. June Dean, assistant vice president at Union First National Bank,

with respect to Boosters' accounts and certificates of deposit at Union First National Bank?

8. When did you assign Ms. Dean to service the Boosters' accounts?
9. Is Boosters required to maintain a "compensating balance" in order to receive the services performed by Ms. Dean or other officers or employees of the Union First National Bank? If so, describe such requirements.
10. Were depositors other than Boosters required to maintain "compensating balances" in 1976 in order to receive services the same as or similar to those services rendered by Ms. Dean with respect to Boosters' accounts and certificates of deposit? If so, describe such requirements.
11. Describe the types of customers for which Union First National Bank "customarily" offers the types of services set forth in your answer to Interrogatory #7 above?
12. How many customers in 1976 received services from an employee or officer of the Union First National Bank the same as or similar to those services described in your answer to Interrogatory #7 above?
13. In 1976, how many officers and employees of Union First National Bank performed services for customers which were the same as or similar to those services performed by Ms. Dean on behalf of Boosters?
14. What criteria are used by Union First National Bank to determine whether a depositor will be offered services the same as or similar to those set forth in

your answer to interrogatory #7 above?

15. Does the Union First National Bank have written guidelines or other published material which describes the services offered to depositors? If so, attach a copy of such guidelines or material to your answers to these interrogatories.
16. In your absence, what officers or employees of Union First National Bank have authority to perform your duties as Treasurer of Boosters?
17. Referring to Exhibit 1 attached hereto, did you authorize Ms. Dean to sign the cover letter? Did you authorize Ms. Dean to prepare the report?
18. If Ms. Dean did not prepare the report in attached Exhibit 1, identify the person who prepared said report.
19. Did you or other officers or employees of Union First National Bank prepare acknowledgement letters to Boosters' contributors in 1976?
20. Do you sign acknowledgement letters to Boosters' contributors that are prepared by someone other than you or employees of Union First National Bank? If so, identify the person(s) who prepare and submit the letters to you for signature.
21. Are the services described in answer to interrogatories #2 and #3 performed by you during normal working hours at Union First National Bank? If not, state when such services are performed.

EXHIBIT 1

REPUBLICAN CONGRESSIONAL BOOSTERS CLUB
600 First Street, N.E.
Washington, D.C. 20002

76 OCT 29 11:31 AM

Membership Chairman
Vice President Nelson Baskin

October 29, 1976

Chairman
Jody Wilson, M.C.

Co-Chairman
Mrs. The Attorney
Mrs. J. A. J. Jones
Mrs. C. Lee Brown
Mrs. Elise Reynolds

Chairman
Federal Election Commission
1425 K Street, N.W.
Washington, D.C. 20543

Executive Director
L. Lee Felt
Carle Brown, Associate

Dear Mr. Chairman:

Attached is a list of individuals who have contributed \$1,000.00 or more to the Republican Congressional Boosters Club since our pre-election report was submitted.

Sincerely,

James A. Dean
James A. Dean
Designated agent to Treasurer

Executive Committee
Senator Hugh Scott
Senate Minority Leader
Congressman John J. Rhodes
House Minority Leader
Senator Robert A. Griffin
Senate Minority Whip
Congressman Carl Albert
House Minority Whip

Treasurer
Charles D. Dowel
Union First National Bank
of Washington
Washington, D.C.

JAD:ms

Schedule A

January 1976

United States Department of the Treasury

Internal Revenue Service

Washington, D.C. 20548

Monitized Receipts,
Contributions, Voucher Purchases, Loans,
Debits, and Transfers for Moni-
toring Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See instructions on back)

Page 2 of 3

LAW NUMBER

This separate sheet is to be used for
monitized data.

Name of Contributor or Committee or Club

Republican Congressional Boosters Club

Name of Contributor or Committee or Club

Mr. Harrison Chandler

801 Sterling Wood Drive
Arcadia, California 91006

10-26-76 \$1,000.00

Name of Contributor or Committee or Club

Chandler Securities Co.

522 So. Flower - Suite 1037

Los Angeles, Calif. 90071

President & Chairman of the Board

\$1,000.00

Name of Contributor or Committee or Club

Mr. & Raymond E. Cox

1116 3 Street, N.W.

Washington, D. C. 20005

10-26-76 \$1,000.00

Name of Contributor or Committee or Club

housewife

\$1,000.00

Name of Contributor or Committee or Club

Mrs. F. Trubee Davison

Petruck Point

Locust Valley, L.I., New York 11550

10-26-76 \$1,000.00

Name of Contributor or Committee or Club

Housewife

\$1,000.00

Name of Contributor or Committee or Club

Mr. William H. Doherty

134 El Camino Drive

Beverly Hills, California 90212

10-26-76 \$1,000.00

Name of Contributor or Committee or Club

4241 Redwood Avenue

Los Angeles, Calif. 90006

Investments

\$1,000.00

Name of Contributor or Committee or Club

Mr. and Mrs. J. Komos

2000 Washington Street

San Francisco, California 94109

10-26-76 \$1,000.00

Name of Contributor or Committee or Club

K-2001 Corp.

31 Beale St.

San Francisco, Calif.

Executive - Mrs. - Housewife

\$1,000.00

Name of Contributor or Committee or Club

Mrs. Cary M. Maguire

1000 First National Bank Bldg.

Dallas, Texas 75203

10-26-76 \$1,000.00

Name of Contributor or Committee or Club

Majestic Oil Co.

2000 Above

President

\$1,000.00

Module A

Form 1000
 dated 1/1/76
 2000 Series, 2000
 2000 Series, 2000

Monetary Receipts, Contributions, Ticket Purchases, Loans, Debates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEC Form 3 (See Instructions on back)

Page 3 of 3

LINE NUMBER

(The separate statement for each contribution must be filed)

Name of Candidate or Committee in full

Republican Congressional Boosters Club

Full name, including street and ZIP code

Mr. G. T. Pflieger
 26 Harbor Island
 Newport Beach, California 92660

Previous address (if any)

none

Occupation

Retired

Check one box indicating the source of the contribution

A. Personal funds of donor

\$ 1,000.00

Date received

10-26-76

Amount received

\$1,000.00

Full name, including street and ZIP code

Mr. Herbert E. Sargent
 55 Benock Road
 Stillwater, Maine 04489

Previous address (if any)

H. E. Sargent Inc.
 address above

Construction

Check one box indicating the source of the contribution

A. Personal funds of donor

\$ 1,000.00

Date received

10-26-76

Amount received

\$1,000.00

Full name, including street and ZIP code

Mr. Robert D. Stuart, Jr.
 345 Merchandise Mart
 Chicago, Illinois 60654

Previous address (if any)

The Quaker Oats Co.
 address above

Chairman of the Board

Check one box indicating the source of the contribution

A. Personal funds of donor

\$ 1,000.00

Date received

10-27-76

Amount received

\$1,000.00

Full name, including street and ZIP code

Mrs. Rae A. Wheeler
 1117 Street Drive
 Las Vegas, Nevada 89102

Previous address (if any)

none

Housewife

Check one box indicating the source of the contribution

A. Personal funds of donor

\$ 1,000.00

Date received

10-27-76

Amount received

\$1,000.00

Full name, including street and ZIP code

Mrs. George W. Perkins
 One East 68th Street
 New York, New York 10021

Previous address (if any)

none

Housewife

Check one box indicating the source of the contribution

A. Personal funds of donor

\$ 1,000.00

Date received

10-28-76

Amount received

\$1,000.00

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Union First National Bank,)
Charles Daniel, President of)
Union First National Bank)

MUR 415 (77)

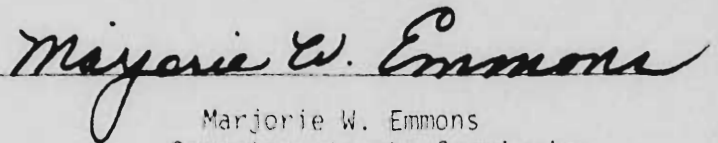
and)

Republican Congressional)
Boosters Club)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 19, 1977, the Commission determined by a vote of 5-0 to proceed through interrogatories in which specific information is requested on the above-captioned matter, such interrogatories to be limited to Ms. June Dean or Mr. Charles Daniel, and such interrogatories to be reviewed first by the Commission.

Commissioner Springer abstained from voting on this matter.



Marjorie W. Emmons
Secretary to the Commission

no date on report

October 6, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 415 (77)

Please have the attached Interim Investigation Report on MUR 415 (77) distributed to the Commission and placed on the Compliance Agenda for the Commission meeting of October 13, 1977.

Thank you.

78040064104

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	MUR 415 (77)
)	
Union First National Bank,)	
Charles Daniel, President)	
of Union First National)	
Bank)	
)	
and)	
)	
Republican Congressional)	
Boosters Club)	

INTERIM INVESTIGATION REPORT

I. Allegations

This matter was initiated based upon findings by the Audit Division in the course of its examination of the books and records of the Republican Congressional Boosters Club (hereinafter Boosters). The audit report indicated that Ms. June Dean, an employee of the Union First National Bank (hereinafter Bank) performed certain services for Boosters' accounts at the Bank which might be contributions prohibited under 2 U.S.C. §441b. Respondent Daniel is the treasurer of Boosters and President of the Bank. He appointed Ms. Dean to perform certain services on behalf of Boosters.

II. Evidence

On July 28, 1977, the Commission found reason to believe that the three respondents had committed violations of 2 U.S.C. §441b.

On August 12, 1977, the Bank responded by submitting an affidavit signed by Ms. Dean. (See Attachment 1.) Ms. Dean

states that she is an assistant vice president of the Bank and performs certain "ordinary" banking services for Boosters' accounts. Among those services are: making deposits and transfers between Boosters' accounts, signing checks on two accounts, and reconciling those accounts. She states that she does not "maintain" accounts for Boosters nor does she prepare letters to accompany contributions. Ms. Dean also states that Bank employees have undertaken such services before for similar "civic and charitable groups."

Boosters responded on August 12, 1977, with an affidavit signed by I. Lee Potter, Executive Director. (See Attachment 2.) Mr. Potter states that Ms. Dean "performs the regular and customary services that banks undertake for their depositors" including making deposits and arranging transfers between Boosters' accounts, signing checks, and balancing the checkbooks for two of Boosters' accounts.

III. Analysis and Recommendation

The responses by the parties to the allegations herein are factually insufficient for a full consideration of this matter by the Commission.

Both Mr. Potter and Ms. Dean in their affidavits make conclusory statements about what are normal banking practices in the industry. Neither has demonstrated his/her qualifications, knowledge, training or experience to justify making such conclusions. Further, their responses are

vague and avoid describing exactly what services Ms. Dean performs or the amount of time she devotes to Boosters' accounts. Ms. Dean provides no information comparing her services for Boosters to those offered other depositors of the bank. Mr. Daniel did not submit any statement or other information relating to the bank's policies regarding services to depositors.

We note that there is at least one disclosure report filed with the Commission by Boosters and signed by Ms. Dean as "Designated Agent to Treasurer." (See Attachment 3.) This raises additional questions about the kinds of services she performs for Boosters.

We, therefore, request authorization to issue subpoenas to the following persons for the purposes of taking their depositions and requiring production of documents.

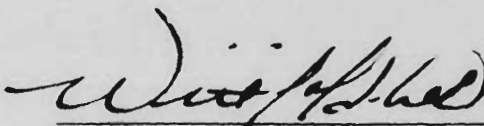
1. Charles Daniel, President of Union First National Bank and Treasurer of Boosters.
2. June Dean, Assistant Vice-President, Union First National Bank.
3. I Lee Potter, Executive Director, Boosters Club.
4. Freddie Lopp, Assistant to the Executive Director, Boosters Club.
5. Shirley D. Gelfo, Bookkeeper, Boosters Club.

We anticipate that the above-named individuals will describe their respective duties and responsibilities with

respect to the handling of the financial affairs of Boosters. This information will provide a factual basis upon which to examine the question of whether the services performed by Ms. Dean on behalf of Boosters are consistent with the Bank's policies toward similarly situated customers.

7304003410
Date:

10/6/77



William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20004

Mr. John R. Bolton
Covington & Burling
888 Sixteenth Street N.W.
Washington, DC 20006

Re: MUR 415 (77)

Dear Mr. Bolton:

Enclosed are copies of subpoenas to appear for deposition upon oral examination which have been served on Mr. I. Lee Potter, Ms. Freddie Lopp and Ms. Shirley D. Gelfo, employees of your client, the Republican Congressional Boosters Club. We believe that the Commission's inquiry into the above matter can be concluded most expeditiously by taking these depositions.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

cc: I. Lee Potter
Freddie Lopp
Shirley D. Gelfo





FEDERAL ELECTION COMMISSION

1200 STREET NW
WASHINGTON, DC 20004

Mr. William A. Glasgow
Hamilton & Hamilton
Union Trust Building
Washington, DC 20005

Re: MUR 415 (77)

Dear Mr. Glasgow:

As counsel to the Union First National Bank, I am enclosing copies of subpoenas to appear for deposition upon oral examination, which have been served on Mr. Charles Daniel and Ms. June Dean of the bank, in the above matter.

Your letter dated August 12 states that Mr. Daniel and Ms. Dean are "ready and willing to respond to any specific questions that you may think unresolved." We appreciate their willingness to cooperate with the Commission, and we believe that by taking oral depositions we can conclude this matter expeditiously.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

cc: Mr. Charles Daniel
Ms. June Dean



HAMILTON AND HAMILTON
UNION TRUST BUILDING
WASHINGTON, D. C. 20005

ATTACHMENT 1

August 12, 1977

HAND DELIVERED

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1335 K Street, N.W.
Washington, D.C. 20463

Re: MUR 415(77)

Dear Mr. Oldaker:

Your letter of August 2, 1977 to Mr. Charles Daniel, President of the Union First National Bank, has been referred to our attention as General Counsel for the Bank.

We have carefully investigated the subject matter of your letter, the servicing of the accounts of the Boosters Club by Mrs. June Dean, an Assistant Vice President of the Bank. From our investigation it appears to us that your letter to Mr. Daniel was based upon a misapprehension as to the activities of Mrs. Dean relative to the Boosters Club. Accordingly, we enclose herewith a statement of Mrs. Dean, under oath, which we trust will correct any factual misunderstanding of this matter. The services that Mrs. Dean performs for the Boosters Club are similar to services that the Bank has undertaken with respect to the accounts of other comparable depositors and such services are part of, or incident to the normal functions of banks.

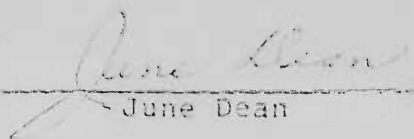
Both Mr. Daniel and Mrs. Dean are, of course, ready and willing to respond to any specific questions that you may think unresolved. Should such questions persist, this letter and its enclosure are not to be construed as a waiver, express or implied, of any procedural or substantive rights or arguments that Union First National Bank or Mr. Daniel may ultimately desire to assert, and we assume that they will be accorded the statutorily required "reasonable opportunity" to demonstrate that no action should be taken against the Bank or Mr. Daniel.

Sincerely yours,

HAMILTON AND HAMILTON

By William A. Glasgow

I also sign checks for two of the three Booster's Club accounts (and keep those two checkbooks balanced). Bank employees have undertaken such services before for similar types of civic and charitable groups. These activities take up a very small amount of time; I have, for instance, this year written only three checks for the Boosters Club. Accounting and bookkeeping functions for the Boosters Club are performed by an outside paid accountant.


June Dean

SUBSCRIBED TO AND SWORN
before me this 28th day
of August, 1977.

Notary Public
My Commission Expires February 28, 1979

August 11, 1977

STATEMENT OF JUNE 1, 1977

I am an Assistant Vice President of the Union First National Bank of Washington (hereafter, "Union First"). Part of the responsibilities of my position include performing ordinary banking services for the accounts of the Republican Congressional Boosters Club (hereafter, the "Boosters Club").

Mr. William C. Oldaker's letter to Mr. Charles Daniel, President of Union First, dated August 2, 1977, contains several statements regarding my duties in connection with the Boosters Club's accounts at Union First. At least two of them are flatly incorrect. I do not prepare letters to accompany contributions from the Boosters Club to candidates for Federal office, and I do not "maintain" accounts for the Boosters Club. I have never undertaken these tasks since the account was assigned to me.

The account was assigned to me by Mr. Daniel as a normal branch banking officer assignment, and I do perform the normal range of banking services for the Boosters Club, such as making deposits and transfers between the accounts maintained by the Boosters Club. I do the same for all of the bank's customers whose accounts are assigned to me. The Boosters Club is a good customer, and has been with Union First for many years. I have never been asked to perform political activities for the Boosters Club.

COVINGTON & BURLING

808 SIXTEENTH STREET N.W.

WASHINGTON D.C. 20008

TELEPHONE
(202) 452-6418FAX 202-452-0008
TELEX 033941
CABLE COVING

WRITER'S LETTER FILE NUMBER

(202) 452-6418

August 12, 1977

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 I Street, N.W.
Washington, D.C.

Dear Mr. Oldaker:

Re: MUR 415 (77)

Enclosed herewith is a statement, under oath, by Mr. I. Lee Potter, Executive Director of the Republican Congressional Boosters Club (hereafter, the "Boosters Club") in response to your letter to him of August 2, 1977. I would like to add briefly to the factual matter contained in his statement.

First, we do not view the invitation in your letter of August 2 to submit any relevant factual or legal materials as the statutorily required "reasonable opportunity to demonstrate that no action should be taken" against the Boosters Club, 2 U.S.C. § 437g(a)(4). You appear to share this view, since your August 2 letter does not state that it is based on that section of the statute.

Second, the enclosed statement by Mr. Potter does not in any way constitute a waiver, express or implied, of any procedural or substantive rights or arguments that the Boosters Club may ultimately desire to assert. Since the evidence demonstrates no violations of any statutory requirements or prohibitions, there is no present need to consider issues of statutory construction or constitutional law. We trust that if you disagree, you will so notify us forthwith.

Mr. William C. Oldaker
August 12, 1977
Page 2

As a factual matter, I believe that Mr. Potter's enclosed statement is sufficient to dispose of this matter immediately, and without any further inquiry. It is plain from his statement that Mrs. Jane Dean, the employee of the Union First National Bank of Washington who handles the Posters Club's accounts, does nothing that could be construed as a "contribution" from the bank.

I strongly believe that this matter should be disposed of by the Commission at the very earliest opportunity. I trust that this letter and the enclosed statement answers your concerns completely and satisfactorily.

Sincerely yours,



John R. Bolton

Enclosure

cc: Gloria Salton

7804004113

August 11, 1977

STATEMENT OF J. L. ...

I am the Executive Director of the ...
Congressional Boosters Club (hereinafter, "the Club").
This statement is in response to the ... C. ...
letter to me of August 2, 1977, concerning the bank accounts
maintained by the Boosters Club at the Union First National
Bank of Washington (hereafter, "Union First").

Mr. ...'s letter contains several errors of fact,
and otherwise appears to be based on a misunderstanding of the
banking relations between the Boosters Club and Union First.
Our accounts at Union First are handled by Mrs. June Dean,
who is an account executive with the bank. She performs the
regular and customary services that banks undertake for their
depositors, such as making deposits and arranging transfers
between the various Boosters Club accounts, and she also signs
checks and balances the checkbooks for two of our three accounts
at Union First. I have never asked her to engage in any political
activity on behalf of the Boosters.

It is a ... incorrect ... as Mr. ...
...
...
...
...

characterize her activities as "maintaining" our accounts. The Boosters Club "maintains" the accounts; Mrs. Dean provides banking services to assist us in that regard. Mrs. Dean does perform these typical services, none of which are different, as I understand it, from the services that would be performed for similar banking customers.

Mr. Olinker's letter also states that Mrs. Dean engages in these activities "at the behest of" Mr. Charles Daniel, Treasurer of the Boosters. Mr. Daniel is President of Union First, and he assigned Mrs. Dean to handle our account. He did so, however, in the normal course of assigning business within the bank. It was not done as a favor to the Boosters or by way of attempting to make a contribution. It was done because the Boosters has accounts at Union First, and these accounts require servicing from time to time, just like a typical business or personal account. These are the functions Mrs. Dean performs.

I. Lee Potter
I. LEE POTTER

SUBSCRIBED AND SWORN TO
before me this _____ day
of August, 19____

Notary Public

ATTACHMENT 3

0111000000

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and other Relevant Documents

To: Charles Daniel
President
Union First National Bank
740-15th Street, N.W.
Washington, D.C. 20005

At the instance of the Federal Election Commission
pursuant to §437d of Title 2 of the United States Code,
you are hereby subpoenaed to appear for deposition with
regard to possible illegal bank contributions in connection
with the Republican Congressional Boosters Club. Notice
is hereby given that the deposition is to be taken

on p.m. and at any and all adjournments
thereof.

You are hereby subpoenaed to appear for this deposition
and, pursuant to §437d of Title 2, United States Code, to
produce at the time of the deposition:

1. Any letters, memoranda, or other written documents
authorizing, appointing or instructing any employee of the
Union First National Bank to perform services on accounts
in the name of the Republican Congressional Boosters Club.

2. Any letters, memoranda or other written documents
received by you from the Republican Congressional Boosters Club

pertaining to your duties as treasurer or instructions with respect to accounts maintained at your bank in its name.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C. this day of , 1977.

THOMAS E. HARRIS
CHAIRMAN

ATTEST:

Secretary to the Commission

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and other Relevant Documents

To: June Dean
Assistant Vice President
Union First National Bank
1701 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

At the instance of the Federal Election Commission
pursuant to §437d of Title 2 of the United States Code,
you are hereby subpoenaed to appear for deposition with
regard to possible illegal bank contributions in connection
with the Republican Congressional Boosters Club. Notice
is hereby given that the deposition is to be taken

on _____ p.m. and at any and all adjournments
hereof.

You are hereby subpoenaed to appear for this deposition
and, pursuant to §437d of Title 2, United States Code, to
produce at the time of the deposition:

1. Any letters, memoranda or other written documents
received by you from the Republican Congressional Boosters
Club pertaining to the performance of services on accounts in
its name at your bank, including instructions to you from the
Club regarding transfers from one account to another, checks
to be drawn, etc.

WHEREAS, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C. this
day of , 1977.

ATTEST:

Secretary to the Commission

FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and other Relevant Documents

To: I. Lee Potter
Executive Director
Republican Congressional Boosters Club
300 First Street, S.E.
Washington, D.C. 20003

At the instance of the Federal Election Commission pursuant to §437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to possible illegal bank contributions in connection with the Republican Congressional Boosters Club. Notice is hereby given that the deposition is to be taken

on p.m. and at any and all adjournments thereof.

You are hereby subpoenaed to appear for this deposition and, pursuant to §437d of Title 2, United States Code, to produce at the time of the deposition:

1. Any letters, memoranda, or other written documents authorizing, appointing or instructing any employee of the Union First National Bank (including Charles Daniel) to perform services on accounts maintained by the Republican Congressional Boosters Club.

WHEREAS, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C. this
day of , 1977.

THOMAS E. HARRIS
CHAIRMAN

ATTEST:

Secretary to the Commission

73040064121

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and other Relevant Documents

To: Freddie Lopp
Republican Congressional Boosters Club
300 First Street, S.E.
Washington, D.C. 20003

At the instance of the Federal Election Commission
pursuant to §437d of Title 2 of the United States Code,
you are hereby subpoenaed to appear for deposition with
regard to possible illegal bank contributions in connection
with the Republican Congressional Boosters Club. Notice
is hereby given that the deposition is to be taken

on _____ p.m. and at any and all adjournments
thereof.

WHEREAS, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C. this
day of _____, 1977.

THOMAS E. HARRIS
CHAIRMAN

ATTEST:

Secretary to the Commission

UNITED STATES OF AMERICA

FEDERAL ELECTION COMMISSION

Subpoena to Appear for Deposition Upon Oral Examination and
to Produce Books, Records and other Relevant Documents

To: Shirley D. Gelfo
2407 Parkway Street
Cheverly, Maryland 20785

At the instance of the Federal Election Commission
pursuant to §437d of Title 2 of the United States Code,
you are hereby subpoenaed to appear for deposition with
regard to possible illegal bank contributions in connection
with the Republican Congressional Boosters Club. Notice
is hereby given that the deposition is to be taken

on _____ p.m. and at any and all adjournments
thereof.

You are hereby subpoenaed to appear for this deposition
and, pursuant to §437d of Title 2, United States Code, to
produce at the time of the deposition:

Any contract, memoranda, letters or other written
documents pertaining to your duties and responsibilities
with the Republican Congressional Boosters Club.

79040064123

WHEREAS, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C. this
day of , 1977.

THOMAS E. HARRIS
CHAIRMAN

ATTEST:

Secretary to the Commission

73040064127

See 1150

COVINGTON & BURLING

888 SIXTEENTH STREET, N.W.

WASHINGTON, D.C. 20006

TELEPHONE
(202) 452-6000

WRITERS DIRECT DIAL NUMBER

(202) 452-6418

TWX 710-822-8005
TELEX 89-593
CABLE COVLING

August 12, 1977

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C.

Dear Mr. Oldaker:

Re: MUR 415 (77)

Enclosed herewith is a statement, under oath, by Mr. I. Lee Potter, Executive Director of the Republican Congressional Boosters Club (hereafter, the "Boosters Club") in response to your letter to him of August 2, 1977. I would like to add briefly to the factual matter contained in his statement.

First, we do not view the invitation in your letter of August 2 to submit any relevant factual or legal materials as the statutorily required "reasonable opportunity to demonstrate that no action should be taken" against the Boosters Club, 2 U.S.C. § 437g(a)(4). You appear to share this view, since your August 2 letter does not state that it is based on that section of the statute.

Second, the enclosed statement by Mr. Potter does not in any way constitute a waiver, express or implied, of any procedural or substantive rights or arguments that the Boosters Club may ultimately desire to assert. Since the evidence demonstrates no violations of any statutory requirements or prohibitions, there is no present need to consider issues of statutory construction or constitutional law. We trust that if you disagree, you will so notify us forthwith.

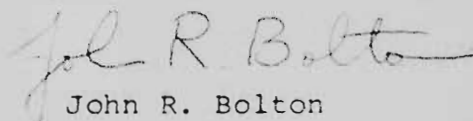
7304004128

Mr. William C. Oldaker
August 12, 1977
Page 2

As a factual matter, I believe that Mr. Potter's enclosed statement is sufficient to dispose of this matter immediately, and without any further inquiries. It is plain from his statement that Mrs. June Dean, the employee of the Union First National Bank of Washington who handles the Boosters Club's accounts, does nothing that could be construed as a "contribution" from the bank.

I strongly believe that this matter should be disposed of by the Commission at the very earliest opportunity. I trust that this letter and the enclosed statement answers your concerns completely and satisfactorily.

Sincerely yours,


John R. Bolton

Enclosure

cc: Gloria Sulton

7 8 0 4 0 0 3 4 1 2 2

August 11, 1977

STATEMENT OF I. LEE POTTER

374003113
I am the Executive Director of the Republican Congressional Boosters Club (hereafter, the "Boosters Club"). This statement is made in response to Mr. William C. Oldaker's letter to me of August 2, 1977, concerning the bank accounts maintained by the Boosters Club at the Union First National Bank of Washington (hereafter, "Union First").

Mr. Oldaker's letter contains several errors of fact, and otherwise appears to be based on a misunderstanding of the banking relations between the Boosters Club and Union First. Our accounts at Union First are handled by Mrs. June Dean, who is an account executive with the bank. She performs the regular and customary services that banks undertake for their depositors, such as making deposits and arranging transfers between the various Boosters Club accounts, and she also signs checks and balances the checkbooks for two of our three accounts at Union First. I have never asked her to engage in any political activity on behalf of the Boosters.

It is therefore incorrect to say, as Mr. Oldaker's letter does, that Mrs. Dean "prepares letters to accompanying [sic] contributions to candidates." It is also misleading to

August 11, 1977

STATEMENT OF I. LEE POTTER

I am the Executive Director of the Republican Congressional Boosters Club (hereafter, the "Boosters Club"). This statement is made in response to Mr. William C. Oldaker's letter to me of August 2, 1977, concerning the bank accounts maintained by the Boosters Club at the Union First National Bank of Washington (hereafter, "Union First").

Mr. Oldaker's letter contains several errors of fact, and otherwise appears to be based on a misunderstanding of the banking relations between the Boosters Club and Union First. Our accounts at Union First are handled by Mrs. June Dean, who is an account executive with the bank. She performs the regular and customary services that banks undertake for their depositors, such as making deposits and arranging transfers between the various Boosters Club accounts, and she also signs checks and balances the checkbooks for two of our three accounts at Union First. I have never asked her to engage in any political activity on behalf of the Boosters.

It is therefore incorrect to say, as Mr. Oldaker's letter does, that Mrs. Dean "prepares letters to accompanying [sic] contributions to candidates." It is also misleading to

2.

characterize her activities as "maintaining" our accounts. The Boosters Club "maintains" the accounts; Mrs. Dean provides banking services to assist us in that regard. Mrs. Dean does perform these typical services, none of which are different, as I understand it, from the services that would be performed for similar banking customers.

Mr. Oldaker's letter also states that Mrs. Dean engages in these activities "at the behest of" Mr. Charles Daniel, Treasurer of the Boosters. Mr. Daniel is President of Union First, and he assigned Mrs. Dean to handle our account. He did so, however, in the normal course of assigning business within the bank. It was not done as a favor to the Boosters or by way of attempting to make a contribution. It was done because the Boosters has accounts at Union First, and those accounts require servicing from time to time, just like a typical business or personal account. Those are the functions Mrs. Dean performs.

I. Lee Potter
I. LEE POTTER

SUBSCRIBED AND SWORN TO
before me this 12th day
of August, 1977.

Elizabeth C. Brodsky
Notary Public
my Comm Expires 3/4/81

CORRESPONDENCE CONTROL SLIP

FEDERAL ELECTION COMMISSION

Do Not Separate From Document

For Division Use

Suspense No.

Name and Address of Sender

John Bolton
888 16th St
Wash, DC

Subject of Correspondence

MUR 415

Date Received

Suspense Date

7227

7000

Referred to

Action (Optional)

1. Carr

2.

3.

4.

5.

Answer Date

File Designation

NRX

4300

Special Instructions:

7 8 0 4 0 0 3 4 1 3 1

77 AUG 12 P 4: 22

TO BE HAND DELIVERED TO:

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.

157

COVINGTON & BURLING

• 808 SIXTEENTH ST., N. W.
WASHINGTON, D. C. 20006

200 1142

HAMILTON AND HAMILTON
UNION TRUST BUILDING
WASHINGTON, D. C. 20005

GEORGE E. HAMILTON JR. (1853-1946)

TELEPHONE 202 341 2002

MARYLAND OFFICE
27 W. JEFFERSON STREET
BETHESDA, MARYLAND 20814
(301) 443-2461

GEORGE E. HAMILTON
WILLIAM A. HAMILTON
JOHN E. HAMILTON
GEORGE E. HAMILTON JR.
STEPHEN A. HAMILTON
RICHARD A. HAMILTON
NICHOLAS A. HAMILTON

WILLIAM A. BECKER
JOHN E. BECKER

August 12, 1977

HAND DELIVERED

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 415(77)

Dear Mr. Oldaker:

Your letter of August 2, 1977 to Mr. Charles Daniel, President of the Union First National Bank, has been referred to our attention as General Counsel for the Bank.

We have carefully investigated the subject matter of your letter, the servicing of the accounts of the Boosters Club by Mrs. June Dean, an Assistant Vice President of the Bank. From our investigation it appears to us that your letter to Mr. Daniel was based upon a misapprehension as to the activities of Mrs. Dean relative to the Boosters Club. Accordingly, we enclose herewith a statement of Mrs. Dean, under oath, which we trust will correct any factual misunderstanding of this matter. The services that Mrs. Dean performs for the Boosters Club are similar to services that the Bank has undertaken with respect to the accounts of other comparable depositors and such services are part of, or incident to the normal functions of banks.

Both Mr. Daniel and Mrs. Dean are, of course, ready and willing to respond to any specific questions that you may think unresolved. Should such questions persist, this letter and its enclosure are not to be construed as a waiver, express or implied, of any procedural or substantive rights or arguments that Union First National Bank or Mr. Daniel may ultimately desire to assert, and we assume that they will be accorded the statutorily required "reasonable opportunity" to demonstrate that no action should be taken against the Bank or Mr. Daniel.

Sincerely yours,

HAMILTON AND HAMILTON

By

William A. Glasgow
William A. Glasgow

August 11, 1977

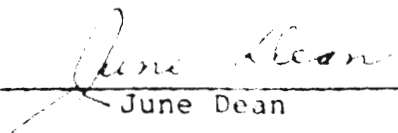
STATEMENT OF JUNE DEAN

I am an Assistant Vice President of the Union First National Bank of Washington (hereafter, "Union First"). Part of the responsibilities of my position include performing ordinary banking services for the accounts of the Republican Congressional Boosters Club (hereafter, the "Boosters Club").

Mr. William C. Oldaker's letter to Mr. Charles Daniel, President of Union First, dated August 2, 1977, contains several statements regarding my duties in connection with the Boosters Club's accounts at Union First. At least two of them are flatly incorrect. I do not prepare letters to accompany contributions from the Boosters Club to candidates for Federal office, and I do not "maintain" accounts for the Boosters Club. I have never undertaken these tasks since the account was assigned to me.


The account was assigned to me by Mr. Daniel as a normal branch banking officer assignment, and I do perform the normal range of banking services for the Boosters Club, such as making deposits and transfers between the accounts maintained by the Boosters Club. I do the same for all of the bank's customers whose accounts are assigned to me. The Boosters Club is a good account, and has been with Union First for many years. I have never been asked to perform political activities for the Boosters Club.

I also sign checks for two of the three Booster's Club accounts (and keep those two checkbooks balanced). Bank employees have undertaken such services before for similar types of civic and charitable groups. These activities take up a very small amount of time; I have, for instance, this year written only three checks for the Boosters Club. Accounting and bookkeeping functions for the Boosters Club are performed by an outside paid accountant.



June Dean

SUBSCRIBED TO AND SWORN
before me this 11 day
of August, 1977.



Notary Public
My Commission Expires February 28, 1979

FEDERAL ELECTION COMMISSION

For Division Use

Suspense No.

Name and Address of Sender

Subject of Correspondence

Date Received

Suspense Date

Referred to

Action (Optional)

Answer Date

File Designation

Special Instructions:

FEC Form 17 (Revised March 1977)

HAMILTON AND HAMILTON

Union Trust Building

WASHINGTON, D. C. 20005

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

HAND DELIVERED

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 415 50150

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)

☐ Show to whom and date delivered..... 35¢

☒ Show to whom, date, & address of delivery... 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
Mr. J. Lee Rank, Dir.
Republican Congressional
Dealers Club

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
945730

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
J. Lee Rank

4. DATE OF DELIVERY 3-3-77 POSTMARK 1977

5. ADDRESS (Complete only if requested)
300 1st St. S.E.

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20541

August 2, 1977

Mr. I. Lee Potter
Executive Director
Republican Congressional Boosters Club
300 First Street, S.E.
Washington, D.C. 20003

Re: MUR 415 (77)

Dear Mr. Potter:

On July 28, 1977, the Commission determined that there was reason to believe the Republican Congressional Boosters Club (hereinafter Boosters) committed a violation of 2 U.S.C. §441b of the Federal Election Campaign Act of 1971, as amended (the Act).

During the course of the audit of Boosters, the Commission learned of certain services performed by Ms. June Dean, Assistant Vice President of Union First National Bank, on behalf of Boosters. We are advised that Ms. Dean maintains two checking accounts and savings accounts for Boosters; that she makes deposits, prepares and signs checks, prepares letters to accompanying contributions to candidates, reconciles bank statements, and arranges for the purchase of certificates of deposit and other transfers between the accounts maintained by Boosters. We are further advised that Ms. Dean was instructed to perform the above services at the behest of your treasurer, Mr. Charles Daniel, who is President of the Union First National Bank. If Ms. Dean performs these services, without compensation from you and during normal business hours, the value of her services paid for by the bank would constitute an illegal contribution under 2 U.S.C. §441b.

2 U.S.C. §441b provides that "it is unlawful for any national bank... to make a contribution or expenditure in connection with any election to any political office, ... or for any corporation whatever... to make a contribution or expenditure in connection with any election at which ... a Senator or Representative in ... Congress are to be voted for"



This statute further provides that it is unlawful for "any... political committee... knowingly to accept or receive any contribution prohibited by this section...." A contribution or expenditure includes "any direct or indirect...services, or anything of value...to any candidate, campaign committee, or political party or organization...."

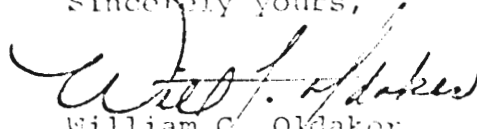
Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be admitted or rebutted.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria R. Sutton (telephone no. 202/523-4057), the attorney assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have counsel notify us in writing.

Sincerely yours,


William C. Oldaker
General Counsel

AUG 2 1977

Mr. I. Lee Potter
Executive Director
Republican Congressional Boosters Club
300 First Street, S.E.
Washington, D.C. 20003

Re: MUR 415 (77)

Dear Mr. Potter:

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2 U.S.C. §441b provides that "it is unlawful for any national bank... to make a contribution or expenditure in connection with any election to any political office, ... or for any corporation whatever... to make a contribution or expenditure in connection with any election at which ... a Senator or Representative in ... Congress are to be voted for"

This statute further provides that it is unlawful for "any... political committee... knowingly to accept or receive any contribution prohibited by this section...." A contribution or expenditure includes "any direct or indirect...services, or anything of value...to any candidate, campaign committee, or political party or organization...."

Under the Act, you have an opportunity to demonstrate that no action should be taken against your committee. 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.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria R. Sulton (telephone no. 202/523-4057), the attorney assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have counsel notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

W.C. Oldaker
7-1-77

Sulton:caw:6/30/77

PS Form 3811, Mar. 1976

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

MUR 415

● **SENDER:** Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).

☐ Show to whom and date delivered..... 15¢

☒ Show to whom, date, & address of delivery.. 35¢

☐ RESTRICTED DELIVERY.
Show to whom and date delivered 65¢

☐ RESTRICTED DELIVERY.
Show to whom, date, and address of delivery 85¢

2. ARTICLE ADDRESSED TO:
*Mr. James D. Jones, Jr.
Union First National Bank
Wash DC 20005*

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943751

(Always, obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
James D. Jones, Jr.

4. DATE OF DELIVERY *7/1/76* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20543

August 2, 1977

Mr. Charles Daniel
President
Union First National Bank
740-15th St., N.W.
Washington, D.C. 20005

Re: MUR 415 (77)

Dear Mr. Daniel:

On July 28, 1977, the Commission determined that there was reason to believe you, individually, and the bank committed violations of 2 U.S.C. §441b of the Federal Election Campaign Act of 1971, as amended (the Act).

In the course of the audit of the Republican Congressional Boosters Club (Boosters), for which you serve as treasurer, the Commission learned of the services performed by Ms. June Dean on behalf of Boosters. We are advised that Ms. Dean with your consent and at your direction, maintains two checking accounts and saving accounts for Boosters; that she makes deposits, prepares and signs checks, prepares letters to accompany contributions to candidates, reconciles bank statements, and arranges for the purchase of certificates of deposit and other transfers between the accounts maintained by Boosters. We are further advised that she performs these services during normal banking hours and without compensation from boosters.

2 U.S.C. §441b provides that "it is unlawful for any national bank . . . to make a contribution or expenditure in connection with any election to any political office, . . . or for any corporation whatever . . . to make a contribution or expenditure in connection with any election at which . . . a Senator or Representative in . . . Congress are to be voted for. . . ." This statute further provides that it is unlawful "for any officer. . . of any corporation or any national bank . . . to consent to any contribution or expenditure. . . prohibited by this section." A contribution or expenditure includes "any direct or indirect . . . services, or anything of value (except a loan of money by a national or State bank made in accordance with the applicable banking laws and regulations and in the ordinary course of business) to any candidate



campaign committee, or political party or organization...."

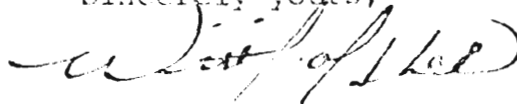
Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the bank. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria R. Sulton (telephone no. 202-423-4057), the attorney assigned to this case.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3) unless you notify the Commission in writing that you wish the investigation to be made public.

If you intend to be represented by counsel in this matter, please have counsel notify us in writing.

Sincerely yours,



William C. Oldaker
General Counsel

Enclosures - 2

~~Letter to [illegible]~~
~~[illegible]~~

AUG 2 1977

Mr. Charles Daniel
President
Union First National Bank
740-15th St., N.W.
Washington, D.C. 20005

Re: MUR 415 (77)

Dear Mr. Daniel:

On 1977, the Commission determined that there was reason to believe you, individually, and the bank committed violations of 2 U.S.C. §441b of the Federal Election Campaign Act of 1971, as amended (the Act).

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2 U.S.C. §441b provides that "it is unlawful for any national bank . . . to make a contribution or expenditure in connection with any election to any political office, . . . or for any corporation whatever . . . to make a contribution or expenditure in connection with any election at which . . . a Senator or Representative in . . . Congress are to be voted for... ." This statute further provides that it is unlawful "for any officer. . . of any corporation or any national bank . . . to consent to any contribution or expenditure. . . prohibited by this section." A contribution or expenditure includes "any direct or indirect . . . services, or anything of value (except a loan of money by a national or State bank made in accordance with the applicable banking laws and regulations and in the ordinary course of business) to any candidate

BEFORE THE FEDERAL ELECTION COMMISSION

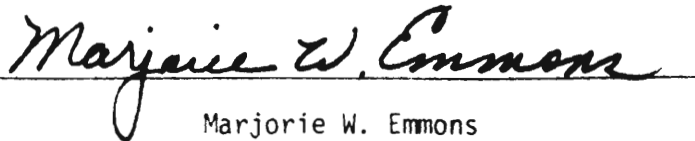
In the Matter of

Union First National Bank,)
Charles Daniel, and)
Republican Congressional)
Boosters Club)

MUR 415 (77)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 28, 1977, the Commission determined by a vote of 5-1 to find Reason to Believe that a violation of 2 U.S.C. Section 441b had been committed in the above-captioned matter. Voting for this finding were Commissioners Aikens, Harris, Staebler, Thomson, and Tiernan; Commissioner Springer voted against the finding.



Marjorie W. Emmons
Secretary to the Commission

AUG 2 1977

Mr. Charles Daniel
President
Union First National Bank
740-15th St., N.W.
Washington, D.C. 20005

Re: MUR 415 (77)

Dear Mr. Daniel:

On 1977, the Commission determined that there was reason to believe you, individually, and the bank committed violations of 2 U.S.C. §441b of the Federal Election Campaign Act of 1971, as amended (the Act).

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2 U.S.C. §441b provides that "it is unlawful for any national bank . . . to make a contribution or expenditure in connection with any election to any political office, . . . or for any corporation whatever . . . to make a contribution or expenditure in connection with any election at which . . . a Senator or Representative in . . . Congress are to be voted for... ." This statute further provides that it is unlawful "for any officer. . . of any corporation or any national bank . . . to consent to any contribution or expenditure. . . prohibited by this section." A contribution or expenditure includes "any direct or indirect . . . services, or anything of value (except a loan of money by a national or State bank made in accordance with the applicable banking laws and regulations and in the ordinary course of business) to any candidate

The Commission is under a duty to investigate this matter expeditiously; therefore, your response should be submitted within ten days after receipt of this notification. If you have any questions, please contact Gloria R. Sulton (telephone no. 202/523-4057), the attorney assigned to this case.

If you intend to be represented by counsel in this matter, please have counsel notify us in writing.

William C. Oldaker
General Counsel

Enclosures

7
B.S.
17-1-77



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, DC 20463

July 15, 1977

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *M. W. E.*

SUBJECT: MUR 415 (77)

The above-mentioned document was transmitted to the Commissioners on July 15, 1977 at 9:00 a.m.

Commissioner Springer submitted an objection at 10:00 a.m., July 15, 1977.

MUR 415 (77) will be placed on the Compliance Agenda for July 28, 1977 at the request of Commissioner Springer who will be on leave next week.



July 14, 1977

MEMORANDUM TO: Marge Emmons
FROM: Elissa Garr
SUBJECT: MUR 415(77)

Please distribute the attached 48 Hour Report on
MUR 415 (77) on a 24 hour no-objection basis.

Thank you.

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FEDERAL ELECTION COMMISSION
Washington, D. C.

48 HOUR GENERAL COUNCIL REPORT

MUR NO. 415 (77)

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

DATE COMPLAINT RECEIVED
BY OGC June 1, 1977

ATTORNEY Sulton

Complainant's Name: Internally generated

Respondent's Name: Union First National Bank and Charles Daniel, President of Union
First National Bank
Republican Congressional Boosters Club (Boosters)

Relevant Statute: 2 U.S.C. §441b

Internal Reports Checked: None Federal Agencies Checked: None

SUMMARY OF ALLEGATION

1. Mr. Daniel, Pres. of Union First National Bank (Union First), appointed an employee of the bank to maintain two checking accounts at the bank, during regular working hours; the services provided through this employee were not the normal services rendered by the bank to its customers; thus, they constituted contributions-in-kind to Boosters in violation of 2 U.S.C. §441b.

2. That Boosters accepted the bank's services without reimbursing it for the value of the employee's time; thus, the receipt of a thing of value from a national bank is in violation of the provisions of 2 U.S.C. §441b.

PRELIMINARY LEGAL ANALYSIS

During the course of the audit of the books and records of the Boosters Club, the auditors learned that Mr. Charles Daniel appointed Ms. June Dean, an Asst. V. P. of Union First, to maintain two checking accounts for Boosters and savings accounts as a part of her regular duties. Ms. Dean makes deposits, prepares and signs checks from the accounts, prepares letters to accompany contributions to candidates, and reconciles the bank statements. She arranges for the purchase of certificates of deposit and other transfers between the accounts maintained by Boosters. The committee pays no fee for these services which are performed during the regular working hours of Ms. Dean.

2 U.S.C. §441b makes it unlawful for any national bank to make a contribution in connection with any election. The services of Ms. Dean are a thing of value which is a contribution. It is also unlawful for any officer of a national bank to consent to the making of a contribution or expenditure.

The statute also prohibits the acceptance or receipt (knowing) of a contribution by a political committee. See attached letter from Boosters to Daniel instructing him on duties and specifically authorizing him to designate an employee of Union First to sign checks.

RECOMMENDATION

Find reason to believe against the bank, Charles Daniel and Boosters; send attached letters.

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REPUBLICAN CONGRESSIONAL BOOSTERS CLUB

300 First Street, S.E., Washington, D.C. 20003 (202) 554-5056

January 26, 1976

Mr. Charles Daniel, Treasurer
Republican Congressional Boosters Club
Union First National Bank of Washington
Washington, D. C. 20003

Dear Mr. Daniel:

This letter is your authorization and direction to take the following steps on behalf of the Republican Congressional Boosters Club:

- (1) You are appointed Treasurer of the Republican Congressional Boosters Club and authorized to perform all duties pertaining thereto.
- (2) You are authorized to collect and receive checks for this organization.
- (3) You are authorized to deposit in any bank of the Union First National Bank of Washington to which checks in your absence or when otherwise directed by you.
- (4) You are authorized to pay such bills as are presented to you which are appropriate to the business of the organization.
- (5) You are authorized to receive a record of letter from the Secretary of the Club of the Treasurer, Charles Daniel, and to receive the same.
- (6) You are authorized to receive a record of letter from the Secretary of the Club of the Treasurer, Charles Daniel, and to receive the same.

(7) You are authorized to open permanent registration
for the Republican Party at the Roosters Club
for special purposes. The fee to be charged
by 1. Lee Potter and 2. [unclear] as cashiers.

This letter is to supersede a previous letter of
March 29, 1974.

Sincerely,



Bob Wilson
National Chairman

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FEDERAL ELECTION COMMISSION

100 K STREET, N.W.
WASHINGTON, D.C. 20543

Gloria Sultan

MUR 415

MEMORANDUM

TO: DAN SMILLINGER

THROUGH:

RP

BOD COSTA/JOE STOLTZ

JTS

FROM:

RAY LISI

RL

DATE:

June 1, 1977

During an audit of the Republican Congressional Boosters Club (the Committee) two matters were raised concerning the activity of the Committee.

The first matter concerns the source of funds used to pay the Committee's operating expenses. The Committee operates under the principle that no portion of any contribution received be used to pay operating expenses. During 1975, the Committee was affiliated with the National Republican Congressional Committee and the National Republican Senatorial Committee. The Congressional Committee paid all operating costs of the Boosters Club during 1975 and was subsequently reimbursed by the Senatorial Committee for one third of these expenses. Just prior to the enactment of the May 1976 Amendments to the Statute, setting one contribution limit for affiliated committees, the Boosters Club filed an amended statement of organization listing no affiliated committees. The Congressional and Senatorial Committees last paid the costs of the Boosters Club in January 1976. For February through April, 1976, the expenses of the Boosters Club were covered by a \$40,000 loan from the Congressional Committee made on January 29, 1976, and repaid on May 6, 1976.

The operating budget for the Boosters Club for the remainder of 1976 and the first part of 1977 was generated from the proceeds of the Senate House Dinner 1976. The Senate House Dinner 1976 was the annual convention sponsored by the Republican National Committee, the National Republican Congressional Committee, the National Republican Senatorial



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Committee, and the Republican Congressional Boosters Club. All expenses for the dinner were paid by the Senatorial Committee. The Boosters Club paid none of the expenses but received its operating budget from the proceeds from which it repaid the \$40,000 loan from the Congressional Committee. This procedure is being followed again in 1977 through the "Tribute to Jerry Ford Dinner". In this case, the costs of the dinner are being paid by the Congressional Committee. The costs of these fundraisers are paid on a rotating basis by the Committees participating with the exception of the Boosters Club.

It is the opinion of the audit team that the source of funds used to pay the operating expenses of the Boosters Club for 1976 and 1977 does not significantly differ from 1975 when the Committees were affiliated.

The Commission currently has before it a matter under review (MUR 306) alleging affiliation between the Boosters Club and the Congressional Committees. Based on the information presented above, the scope of the MUR could be expanded to include the Senatorial Committee and the Republican National Committee.

The second matter concerns services being provided the Committee by an employee of the Union First National Bank of Washington.

The Committee Treasurer, Mr. Charles Daniel, (who is also the President of Union First National Bank) has appointed Ms. June Dean, an Assistant Vice President of the bank, to maintain two Committee checking accounts and savings accounts as a part of her regular duties at the bank. Ms. Dean makes deposits to the accounts, prepares and signs checks from the accounts, prepares letters to accompany contributions to candidates, and reconciles the bank statements at the end of each month. Ms. Dean also arranges for the purchase of certificates of deposit for the Committee and other transfers between the accounts. The Committee pays no fee for these services; nor is it required to maintain a compensating balance in any of its accounts. All of the services are provided during regular working hours and Ms. Dean is not compensated by the Committee.

It is the opinion of the audit team that these services clearly constitute a contribution in kind from Union First National Bank to the Committee. We recommend that the Committee discontinue the arrangement or reimburse the bank for the reasonable cost of the services provided by Ms. Dean. In any case the bank should be reimbursed by the Committee for the services provided by Ms. Dean in the past.

We would appreciate your comments on both matters raised above, and are willing to discuss each at your convenience.

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1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 415

