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December 29, 1998

Mr. F. Andrew Turley, Esq.  
Central Enforcement Docket  
Federal Election Commission  
999 E. Street NW  
Washington, DC 20463

*Reference: MUR 4855: Response to the Complaint against Burkhold For Congress et. al.*

Dear Mr. Turley,

On November 20, 1998 the Mike Burkhold for Congress Committee ("BFC") received your letter regarding an administrative complaint filed by Mr. Burkhold's Democratic opponent John Spratt. Specifically, the complainant objected because (1) Mr. Spratt could not determine the source of several loans of personal funds in reviewing a personal financial disclosure report, and (2) Mr. Spratt was dissatisfied with BFC's "best efforts" reporting. This letter responds to that complaint.

Mr. Spratt's complaint has no merit and should be dismissed. As an initial matter, Mr. Spratt's complaints about the completeness of Mike Burkhold's personal financial disclosure ("PFD") statement are misplaced. PFDs are required by the Ethics in Government Act of 1978, not the Federal Election Campaign Act. Jurisdiction over enforcement of Ethics in Government Act of 1978 is vested in the House of Representatives Committee on Standards of Official Conduct and the U.S. Department of Justice, not the Federal Election Commission. Mr. Spratt's complaint about alleged violations of 5 U.S.C. app. 102 is therefore misdirected.

Furthermore, Mr. Spratt offers no evidence that Mr. Burkhold's loan of personal funds came from anything other than personal funds. Rather, Mr. Spratt has filed a complaint based upon suspicion and speculation - simply because his campaign cannot itself discern "any possible source for the loans in question." In fact Mr. Burkhold's personal funds came from the sale - a taxable event at fair market value - of a portion of his

Letter to Mr. F. Andrew Turley, Esq.

Page 2

December 29, 1998

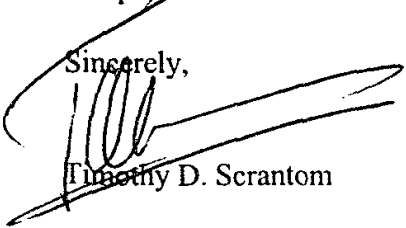
interest in Zeus Mediterranean Foods, LLC. See Affidavit of Michael Burkhold, attached hereto as Exhibit A and incorporated by reference, par. 4. Federal regulations permit candidates to convert personal illiquid assets into liquid funds for the purposes of contribution to their own campaign. 11 C.F.R § 110.10(b)(1).

It is also worth noting that the Burkhold for Congress Committee never spent any of the personal funds loaned. In each case, the personal loans made just prior to the close of reporting periods were repaid in full, never having left the campaign account. See Exhibit A, par. 5.

As regards the alleged failure to exercise "best efforts", BFC has endeavored to report all required information. BFC solicitations include the recommended language requesting donor's names, addresses, occupations, and employers. See Exhibit A, par. 6. BFC sends follow-up letters where itemized donors fail to provide this information. Moreover, BFC has endeavored to promptly amend its reports that lack this required information. See Amendments on file with the Commission. BFC takes this requirement seriously and is presently unaware of any missing occupation or employer information for which best efforts to obtain the data have not been exercised.

Mr. Spratt's malicious assertions and breathless partisan broadsides do not require Commission investigation or action. The Commission's efforts through its RFAs adequately assist campaigns such as BFC in ensuring that all required information is produced. Taxpayer resources are better spent on actual violations of the law, and this complaint should be dismissed.

Sincerely,



Timothy D. Scrantom

cc: Mike Burkhold

enclosures

## EXHIBIT A

## STATE OF SOUTH CAROLINA

## COUNTY OF YORK

Personally appeared before me this 29<sup>th</sup> day of December, 1998, Michael B. Burkhold, Jr., who first being duly sworn, deposes and says as follows:

1. I am a resident of York County, South Carolina.
2. During 1998 I made an unsuccessful run for the South Carolina 5<sup>th</sup> Congressional District seat in the United States House of Representatives.
3. My opponent in the recent election, John Spratt ("Spratt"), has filed a malicious and baseless administrative complaint with the Federal Election Commission ("FEC"), raising issues concerning the funding of my campaign for Congress.
4. Specifically, Spratt has attacked my use of proceeds from the sale of part of my interest in Zeus Mediterranean Foods, LLC ("Zeus"), a food company of which I am a part-owner, in order to finance my campaign. This sale was a taxable event at fair market value, and the proceeds were loaned to the Mike Burkhold for Congress Committee ("BFC").
5. None of the proceeds from the sale of my interest in Zeus were ever actually spent by my campaign. Rather, the personal loans to BFC made just prior to the close of reporting periods were repaid in full, having never left the BFC campaign account. See BFC Campaign Filings, attached hereto as Exhibit 1 and incorporated by reference.
6. Spratt has also alleged that BFC failed to use "best efforts" in reporting sources of campaign funding. I attest that BFC solicitations include FEC recommended language regarding donors' names, addresses, occupations, and employers. See sample BFC

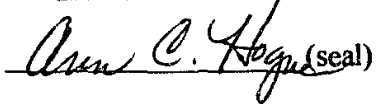
solicitation attached hereto as Exhibit 2 and incorporated by reference. Moreover, BFC sent follow up letters where itemized donors failed to provide requested information, and BFC has promptly amended reports lacking required information.

FURTHER AFFIANT SAYETH NAUGHT.



Michael B. Burkhold Jr.

Sworn to before me  
this 29 day of December, 1998.

 (seal)

Notary Public for South Carolina

My commission expires: s 1-16-2007

2007-12-29 14:43:00

## EXHIBIT 1

SCHEDULE C  
(Revised 3/80)

## LOANS

Page 1 of 1  
LINE NUMBER 10  
(Use separate schedule  
for each numbered line)

Name of Committee (in Full)		Original Amount of Loan		Contributions Payment To Date	Balance Outstanding at Close of This Period
Committee to Elect Mike Burkhold to Congress		C00329310			
A. Full Name, Mailing Address and ZIP Code of Loan Source Mike Burkhold 1956 Middleton Place Rock Hill, SC 29732		Original Amount of Loan \$30,000		Contributions Payment To Date 0	Balance Outstanding at Close of This Period \$30,000
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Term: Date Incurred 3/2/98 Date Due 1/2/99 Interest Rate 0 % (ap)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) in Item A					
1. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
2. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
3. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
B. Full Name, Mailing Address and ZIP Code of Loan Source NBYC Box 346 Rock Hill, SC 29732		Original Amount of Loan \$676.00		Contributions Payment To Date \$164.98	Balance Outstanding at Close of This Period \$1,531.02
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Term: Date Incurred 1/2/98 Date Due 12/1/98 Interest Rate 11.00% (ap)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) in Item B					
1. Full Name, Mailing Address and ZIP Code Mike Burkhold 1956 Middleton Place Rock Hill, SC 29732		Name of Employer Town of Clover			
		Occupation Town Administrator			
		Amount Guaranteed Outstanding \$1531.02			
2. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
3. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
SUBTOTALS This Period This Page (optional)					
TOTALS This Period (last page in this line only)					\$1,531.02

Carry outstanding balance only to LINE J, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

**SCHEDULE C**  
 (Revised 3/80)

**LOANS**

 Page 1 of 2 of  
 LINE NUMBER 20  
 (Use separate schedules  
 for each individual line)

Name of Contributor (in Full)			
Committee to Elect Mike Burkhold to Congress			
C00329310			
A. Full Name, Mailing Address and ZIP Code of Loan Recipient		Original Amount of Loan	Balance Outstanding at Close of This Period
Mike Burkhold 1956 Middleton Place Rock Hill, SC 29732		\$30,000.00	\$0
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Term: Date Received <u>3/3/98</u> Date Due <u>4/2/99</u> Interest Rate <u>2 % (nom)</u> <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Recipient		Original Amount of Loan	Balance Outstanding at Close of This Period
National Bank of York County Box 3786 Rock Hill, SC 29732		\$1,696.00	\$1,205.63
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Term: Date Received <u>1/23/98</u> Date Due <u>12/1/98</u> Interest Rate <u>11.00 % (nom)</u> <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
Mike Burkhold 1956 Middleton Place Rock Hill, SC 29732		Town of Clover	
		Town Administrator	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this form only)			
Carry outstanding balances only to LINE 3, Schedule D, for this page. If on Schedule D, carry forward to appropriate line of Summary.			

**SCHEDULE C**  
 (Revised 3/90)

**LOANS**

 Page 2 of 2 for  
 LINE NUMBER 70  
 (Use separate schedule  
 for each registered line)

Name of Committee (in Full)			
Committee to Elect Mike Burkholz to Congress			
C00324310			
A. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Mike Burkholz 1956 Middleton Place Rock Hill, SC 29732		\$30,000	\$30,000
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Completions Payment To Date	
Term: Date Incurred <u>5/20/98</u> Date Due <u>4/3/99</u> Interest Rate <u>5</u> % (Year)		<input type="checkbox"/> Secured	
List All Endorsees or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Completions Payment To Date	
Term: Date Incurred _____ Date Due _____ Interest Rate _____ % (Year)		<input type="checkbox"/> Secured	
List All Endorsees or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this list only)			31,205.63
Carry outstanding balances only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

FED-1000

**SCHEDULE C**

(Financial 280)

**LOANS**Page 2 of 2 for  
LIFE INSURANCE  
(Use amounts calculated  
for each numbered line)

Name of Committee (in full)

Committee to Elect Mike Burkhead to CongressC00326310

<b>A. Full Name, Mailing Address and ZIP Code of Loan Recipient</b> <u>Mike Burkhead</u> <u>1958 Middleton Pl</u> <u>Rock Hill, SC 29732</u> Election: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Original Amount of Loan</b> <u>30,000</u>	<b>Calculation Payment To Date</b> <u>30,000</u>	<b>Balance Outstanding at Close of This Period</b> <u>0</u>
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Term: <u>5-28-98</u>	Date Due: <u>1-2-99</u>	Interest Rate: <u>7.50%</u>	<input type="checkbox"/> Secured
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List All Employers or Guarantors (if any) in Part C

<b>1. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>		
	<b>Occupation</b>		
	<b>Amount Guaranteed Outstanding:</b> \$		
<b>2. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>		
	<b>Occupation</b>		
	<b>Amount Guaranteed Outstanding:</b> \$		
<b>3. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>		
	<b>Occupation</b>		
	<b>Amount Guaranteed Outstanding:</b> \$		

<b>B. Full Name, Mailing Address and ZIP Code of Loan Recipient</b>	<b>Original Amount of Loan</b>	<b>Calculation Payment To Date</b>	<b>Balance Outstanding at Close of This Period</b>
<u></u>	<u></u>	<u></u>	<u></u>
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
Term: <u></u>	Date Due: <u></u>	Interest Rate: <u></u>	<input type="checkbox"/> Secured

List All Employers or Guarantors (if any) in Part C

<b>1. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>		
	<b>Occupation</b>		
	<b>Amount Guaranteed Outstanding:</b> \$		
<b>2. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>		
	<b>Occupation</b>		
	<b>Amount Guaranteed Outstanding:</b> \$		
<b>3. Full Name, Mailing Address and ZIP Code</b>	<b>Name of Employer</b>		
	<b>Occupation</b>		
	<b>Amount Guaranteed Outstanding:</b> \$		

GRAND TOTALS This Period This Page (optional)

TOTALS This Period (Use page in this line only)

Carry outstanding balance only to LIRE 2, Schedule D, for this line. If on Schedule C, carry forward to appropriate line of Summary.



## SCHEDULE C

(Revised 3/80)

## LOANS

 Page 1 of 2  
 LINE NUMBER 20  
 (Use separate schedules  
 for each numbered line)

Name of Committee (If Full)			
<b>Committee to Elect Mike Burkhead to Congress</b> <span style="float: right;"><b>000324310</b></span>			
<b>A. Full Name, Mailing Address and ZIP Code of Loan Source</b> Mike Burkhead 1988 Midway Pl. Rock Hill, SC 29732		<b>Original Amount of Loan</b> 33,000	<b>Committed Payment To Date</b> 0
<b>Balance Outstanding at Close of This Period</b> 33,000			
<b>Section:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>Terms:</b> Date Incurred <u>6-30-78</u> Date Due <u>1-2-99</u> Interest Rate <u>0</u> % (per) <input type="checkbox"/> Secured			
<b>List All Endorsers or Guarantors (If any) to Item A</b>			
<b>1. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding:</b> \$	
<b>2. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding:</b> \$	
<b>3. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding:</b> \$	
<b>B. Full Name, Mailing Address and ZIP Code of Loan Source</b>		<b>Original Amount of Loan</b>	<b>Committed Payment To Date</b>
			<b>Balance Outstanding at Close of This Period</b>
<b>Section:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
<b>Terms:</b> Date Incurred _____ Date Due _____ Interest Rate _____ % (per) <input type="checkbox"/> Secured			
<b>List All Endorsers or Guarantors (If any) to Item B</b>			
<b>1. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding:</b> \$	
<b>2. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding:</b> \$	
<b>3. Full Name, Mailing Address and ZIP Code</b>		<b>Name of Employer</b>	
		<b>Occupation</b>	
		<b>Amount Guaranteed Outstanding:</b> \$	
<b>SUBTOTALS This Period This Page (optional)</b>			
<b>TOTALS This Period (first page in this line only)</b>			33,000
Carry outstanding balance only to LINE 2, Schedule D, for this line. If on Schedule D, carry forward to appropriate line of Summary.			

**SCHEDULE C**  
 (Revised 3/80)

**LOANS**

 Page 1 of 1 for  
 LINE NUMBER  
 (Use separate schedules  
 for each scheduled line)

Name of Guarantor (if any)

Committee to Elect Mike Burkhold to Congress

A. Full Name, Mailing Address and ZIP Code of Loan Source Mike Burkhold 1506 Middleton Place Rock Hill, SC 29730	Original Amount of Loan \$33,000	Cumulative Payments To Date \$33,000	Balance Outstanding at Close of This Period 0
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 Election: ☐ Primary ☒ General ☐ Other (specify):

 Terms: ☐ Secured ☐ Unsecured Date Due 12/31/98 Interest Rate 0 % APR

List All Endorsees or Guarantors (if any) in lines A

1. Full Name, Mailing Address and ZIP Code  	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code  	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code  	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		

B. Full Name, Mailing Address and ZIP Code of Loan Source  	Original Amount of Loan  	Cumulative Payments To Date  	Balance Outstanding at Close of This Period  
---	---------------------------------	-------------------------------------	---

 Election: ☐ Primary ☐ General ☐ Other (specify):

 Terms: ☐ Secured ☐ Unsecured Date Due \_\_\_\_\_ Interest Rate \_\_\_\_\_ % APR

List All Endorsees or Guarantors (if any) in lines B

1. Full Name, Mailing Address and ZIP Code  	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
2. Full Name, Mailing Address and ZIP Code  	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		
3. Full Name, Mailing Address and ZIP Code  	Name of Employer  Occupation  Amount Guaranteed Outstanding: \$		

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

SPRINT

## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule to report disbursements for the purpose of the election campaign.

PAGE 1 OF 1  
FOR LINE NUMBER 196

Made/Guaranteed by the Candidate (Loan Principal Repayment)

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

NAME OF COMMITTEE (in Full)

Committee to Elect Mike Barkhold to Congress

C00328310

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Bank of York County Box 3196 Rock Hill, SC 29732	repayment of loan principal Disbursed for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4-1-98 5-1-98	\$169.48 \$166.48
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mike Barkhold 155 Middleton Place Rock Hill, SC 29732	repayment of candidate loan Disbursed for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	4-1-98	\$3,000
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursed for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$331.46

FED-1114



## SCHEDULE B

## ITEMIZED DISBURSEMENTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE 1 OF 1  
FOR LINE NUMBER  
19A

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

NAME OF COMMITTEE (in full)

Committee to elect Mike Burkhold to Congress

A. Full Name, Mailing Address and ZIP Code

Mike Burkhold  
1506 Middleton Place  
Rock Hill, SC 29730

Purpose of Disbursement

principal payment of loan  
to candidateDisbursement for: ☒ Primary ☒ General  
☐ Other (specify)Date (month,  
day, year)

7/1/98

Amount of Each  
Disbursement This Period

\$33,000

B. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)Date (month,  
day, year)Amount of Each  
Disbursement This Period

C. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)Date (month,  
day, year)Amount of Each  
Disbursement This Period

D. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)Date (month,  
day, year)Amount of Each  
Disbursement This Period

E. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)Date (month,  
day, year)Amount of Each  
Disbursement This Period

F. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)Date (month,  
day, year)Amount of Each  
Disbursement This Period

G. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)Date (month,  
day, year)Amount of Each  
Disbursement This Period

H. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)Date (month,  
day, year)Amount of Each  
Disbursement This Period

I. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Disbursement for: ☐ Primary ☐ General  
☐ Other (specify)Date (month,  
day, year)Amount of Each  
Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$33,000

EXHIBIT 2

**Burkhold for Congress  
P.O. Box 10488  
Rock Hill, SC 29731**

December 5, 1998

Mr. Matt Kennedy  
P.O. Box 922  
Aiken, SC 29802

Dear Mr. Kennedy:

Thank you for your contribution to our campaign. Federal law requires political committees to report the name, mailing address, occupation and the name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year.

Would you please provide this information on the bottom portion of this letter in the spaces provided, and return it to me at your earliest convenience.

Sincerely,

Hulic Ratterre  
Treasurer

Employer Name: \_\_\_\_\_  
Occupation: \_\_\_\_\_

\_\_\_\_\_  
(Signature)