

SANDLER & REIFF, P.C.

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WASHINGTON, DC 20003

JOSEPH E. SANDLER
NEIL P. REIFF

TELEPHONE: (202) 543-7680
FACSIMILE: (202) 543-7686

Pre-Mur 377

April 7, 1999

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
APR 7 2 37 PM '99

By Hand

Lois Lerner, Esq.
Associate General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Self-Referral: MMG Management Group, Inc.

Dear Ms. Lerner:

On behalf of our client, MSBDFA Management Group, Inc. ("MMG"), we wish to bring to the Commission's attention certain facts that MMG wishes to disclose to the Commission, indicating violations of the Federal Election Campaign Act of 1971, as amended (the "Act") by MMG. Further on behalf of MMG, we request that the Office of General Counsel initiate an enforcement proceeding; that the Commission find reason to believe that MMG has violated 2 U.S.C. §§ 441a(a), 441b and 441f; and that the Office of General Counsel obtain the Commission's authorization to engage in pre-probable cause conciliation with MMG pursuant to 11 C.F.R. § 111.18(d).

I. Factual Background

MMG is a for-profit corporation organized under the laws of the state of Maryland. The corporation's business is to arrange for grants, surety bonding, equity investments, loans and loan guarantees from certain foundations, the Small Business Administration, Maryland state government agencies and other private corporations and not-for-profit organizations, to minority-owned businesses, and to service those grants and loans. MMG charges a fee for those services.

Stanley W. Tucker is president of the corporation. Timothy L. Smoot is the senior vice president for finance of the corporation. Catherine D. Lockhart is executive

vice president of the corporation. R. Randy Croxton is senior vice president, investments, of the corporation.

On several different occasions in 1997 and 1998, these officers obtained funds from the corporation for the express purpose of using the funds to make contributions to candidates for federal office. None of the officers was in any way aware that such a corporate advance or reimbursement of funds was unlawful. Indeed, the check requests submitted to the company by the officers clearly indicate that the purpose of each advance of funds was to make political contributions. Copies of the check request forms which MMG has been able to locate are attached hereto as Exhibit 1.

Based on MMG's research to date, a total of \$ 4,200 of corporate funds was used by these officers to make contributions to at least five candidates for federal office, in the names of these officers. In some cases, the officer who obtained the funds from the company endorsed the corporate check to another officer, who in turn used the funds to make a contribution or contributions to a federal candidate. The disposition of funds from several MMG checks, totaling \$500 of the \$4,200 is not known to MMG at this time, but the company is continuing to research that question.

Attached as Exhibit 2 is a chart showing, to the best of MMG's current information and belief, the use of the corporate funds at issue, and the ultimate use of the funds to make contributions to various federal candidates in the names of the officers involved. Exhibit 2 identifies those cases MMG has been able to identify, in which an officer endorsed a corporate check to another officer, who used the funds to make a contribution to a federal candidate.

It is possible that some additional reimbursements or advances were made to MMG officers for the purpose of making contributions to federal candidates. As soon as any additional information is developed to determine whether or not any such additional reimbursements were made, MMG will promptly disclose that information.

Attached as Exhibit 3 are copies of the checks issued by MMG to the four officers, as shown on the chart.

Attached as Exhibit 4 are copies of the personal checks written by the corporate officers to the campaigns of candidates for federal office, corresponding to the contributions to such campaigns listed on Exhibit 2.

II. Legal Analysis

It is apparent that, by providing funds to four officers for the purpose of having those officers make contributions to the authorized committees of candidates for federal office, MMG has violated the Act's ban on corporate contributions, 2 U.S.C. § 441b, and

Lois Lerner, Esq.

April 7, 1999

Page 3

the Act's ban on making contributions in the name of another, 2 U.S.C. § 441f. Further, because the total amount of contributions made to at least one campaign, Albert Wynn for Congress, exceeded the applicable limit, MMG has also apparently violated 2 U.S.C. § 441a(a).

At the same time, it is obvious that MMG's officers were entirely unaware that the use of corporate funds in this way violated the Act. There was no attempt to conceal the use of the company's funds for these contributions. To the contrary, each written request for funds by one of the officers clearly indicated that the purpose of the funds was to make political contributions. Further, upon learning that the contributions may have violated state or federal laws, MMG's board of directors passed a resolution and adopted a policy, expressly prohibiting the corporation from making any political contributions in the future. A copy of that resolution is attached as Exhibit 5.

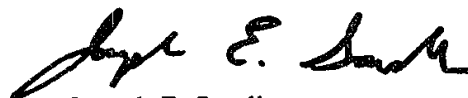
For these reasons, MMG respectfully requests that:

- (1) The Commission initiate an enforcement proceeding in this matter;
- (2) The Commission find reason to believe that MMG has violated 2 U.S.C. §§ 441(a), 441b and 441f, but that such violations were not knowing and willful;
- (3) The Office of General Counsel obtain the Commission's authorization to engage in pre-probable cause conciliation pursuant to 11 C.F.R. § 111.18(d);
- (4) Pursuant to such authorization OGC engage in pre-probable cause conciliation with respect to the matters described in this letter.

MMG is prepared to cooperate fully in any investigation, whether by OGC at the pre-MUR stage or initiated by the Commission pursuant to a reason to believe finding, by making all relevant documents available to the Commission and by making its officers available for interviews and/or depositions that may be requested by OGC.

We look forward to hearing from you. In the meantime, if you have any questions or need any additional information, please contact the undersigned.

Sincerely yours,



Joseph E. Sandler

cc: Paul Mark Sandler, Esq. (w/enclosures)

Exhibit 1

10/13/97

Janet H. Hall

Catherine D.Lockhart

\$ 250.00

10/15/97

Distribution for political contribution

72

REVIEWED FOR
CODING BY...

1898

39017

APC-29

10/13/97

Janet H. Hall

Timothy L. Smoot

\$ 250.00

10/15/97

Distribution for political contribution

TS

1899

39037

MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST

DATE 10/13/97

REQUESTED BY Janet H. Hall

PAYEE NAME Stanley W. Tucker

AMOUNT \$ 250.00

DATE REQUIRED 10/15/97

DESCRIPTION Distribution for political contribution

APPROVED BY RS

REVIEWED FOR
CODING BY

CHECK NUMBER 1900

ACCOUNT NUMBER 39007

50-011-707-11975

MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST

DATE 10/14/97

REQUESTED BY Janet H. Hall

PAYEE NAME R.Randy Croxton

AMOUNT \$ 250.00

DATE REQUIRED 10/15/97

DESCRIPTION Distribution for political contribution

APPROVED BY TS

REVIEWED FOR
CODING BY

CHECK NUMBER 1901

ACCOUNT NUMBER 39027

MSBDFa MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST

DATE 2/3/98

REQUESTED BY Janet H. Hall

PAYEE NAME R.Randy Croxton

AMOUNT \$ 250.00

DATE REQUIRED 2/4/98

DESCRIPTION Distribution for political contribution

APPROVED BY _____

REVIEWED FOR
CODING BY _____

CHECK NUMBER 2164

ACCOUNT NUMBER 39027

MSBDFa MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST

DATE 2/3/98

REQUESTED BY Janet H. Hall

PAYEE NAME Catherine D. Lockhart

AMOUNT \$ 250.00

DATE REQUIRED 2/4/98

DESCRIPTION Distribution for political contribution

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2165

ACCOUNT NUMBER 39017

200001307.11970

MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST

DATE 2/3/98

REQUESTED BY Janet H. Hall

PAYEE NAME Timothy L. Smoot

AMOUNT \$ 250.00

DATE REQUIRED 2/4/98

DESCRIPTION Distribution for political contribution

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2166

ACCOUNT NUMBER 39037

39037-250.00

MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST

DATE 10/13/97

REQUESTED BY Janet H. Hall

PAYEE NAME Stanley W. Tucker

AMOUNT \$ 250.00

DATE REQUIRED 2/4/98

DESCRIPTION Distribution for political contribution

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2167

ACCOUNT NUMBER 39007

**MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST**

DATE 3/24/98

REQUESTED BY Janet H. Hall

PAYEE NAME Timothy L. Smoot

AMOUNT \$ 50.00

DATE REQUIRED 3/24/98

DESCRIPTION Distribution for political contribution-Cardin

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2254

ACCOUNT NUMBER 39037

**MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST**

DATE 3/24/98

REQUESTED BY Janet H. Hall

PAYEE NAME Catherine D. Lockhart

AMOUNT \$ 50.00

DATE REQUIRED 3/24/98

DESCRIPTION Distribution for political contribution-Cardin

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2255

ACCOUNT NUMBER 39017

**MSB DFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST**

DATE 10/13/97

REQUESTED BY Janet H. Hall

PAYEE NAME Stanley W. Tucker

AMOUNT \$ 50.00

DATE REQUIRED 3/24/98

DESCRIPTION Distribution for political contribution-Cardin

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2256

ACCOUNT NUMBER 39007

**MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST**

DATE 4/21/98

REQUESTED BY Janet H. Hall

PAYEE NAME Stanley W. Tucker

AMOUNT \$ 250.00

DATE REQUIRED 4/22/98

DESCRIPTION Distribution for contribution-Mikulski

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2331

ACCOUNT NUMBER 39007

**MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST**

DATE 4/21/98

REQUESTED BY Janet H. Hall

PAYEE NAME R. Randy Croxton

AMOUNT \$ 250.00

DATE REQUIRED 4/22/98

DESCRIPTION Distribution for contribution-Mikulski

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2332

ACCOUNT NUMBER 39027

**MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST**

DATE 4/21/98

REQUESTED BY Janet H. Hall

PAYEE NAME Catherine D.Lockhart

AMOUNT \$ 250.00

DATE REQUIRED 4/22/98

DESCRIPTION Distribution for contribution-Mikulski

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2333

ACCOUNT NUMBER 39017

**MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST**

DATE

4/21/98

REQUESTED BY

Janet H. Hall

PAYEE NAME

Timothy L. Smoot

AMOUNT

\$ 250.00

DATE REQUIRED

4/22/98

DESCRIPTION

Distribution for contribution-Mikulski

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER

2334

ACCOUNT NUMBER

39037

**MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST**

DATE 5/4/98

REQUESTED BY Janet H. Hall

PAYEE NAME R.Randy Croxton

AMOUNT \$ 250.00

DATE REQUIRED 5/7/98

DESCRIPTION Distribution for contribution-
Moseley-Braun and Richardson

APPROVED BY

REVIEWED FOR
CODING BY

CHECK NUMBER 2355

ACCOUNT NUMBER 39027

MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST

DATE 4/21/98

REQUESTED BY Janet H. Hall

PAYEE NAME Stanley W. Tucker

AMOUNT \$ 250.00

DATE REQUIRED 4/22/98 5/7/98

DESCRIPTION Distribution for contribution-
Moseley-Braun and Richardson

APPROVED BY _____

REVIEWED FOR
CODING BY _____

CHECK NUMBER 2356

ACCOUNT NUMBER 39007

**MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST**

DATE 5/4/98

REQUESTED BY Janet H. Hall

PAYEE NAME Catherine D. Lockhart

AMOUNT \$ 250.00

DATE REQUIRED 4/22/98 5/1/98

DESCRIPTION Distribution for contribution-
Moseley-Braun and Richardson

APPROVED BY _____

REVIEWED FOR
CODING BY _____

CHECK NUMBER 7357

ACCOUNT NUMBER 39017

MSBDFA MANAGEMENT GROUP, INC.
EXPENSE VOUCHER/CHECK REQUEST

DATE 5/4/98

REQUESTED BY Janet H. Hall

PAYEE NAME Timothy L. Smoot

AMOUNT \$ 250.00

DATE REQUIRED 4/22/98 5/1/98

DESCRIPTION Distribution for contribution-
Moseley-Braun and Richardson

APPROVED BY _____

REVIEWED FOR
CODING BY _____

CHECK NUMBER 2358

ACCOUNT NUMBER 39037

REIMBURSEMENT CONTRIBUTION TRANSACTIONS

MMG, INC. CHECK NO.	DATE	PAYEE	PERSONAL CHECK NO.	DATE	PAYEE
1898	10/14/97	Catherine D. Lockhart (\$250)	1095	10/16/97	Wynn For Congress (\$250)
1899	10/14/97	Timothy L. Smoot (\$250)			Wynn For Congress (\$500)
1900	10/14/97	Stanley W. Tucker (\$250)	2040	10/16/97	Wynn For Congress (\$250)
1901	10/14/97	R. Randy Croxton (\$250)	NA	NA	Endorsed to Timothy L. Smoot (\$250)
2164	2/3/98	R. Randy Croxton (\$250)	NA	NA	Endorsed to Timothy Smoot (\$250)
2165	2/3/98	Catherine D. Lockhart (\$250)			
2166	2/3/98	Timothy L. Smoot (\$250)	3567	2/12/98	Cummings For Congress (\$500)
2167	2/3/98	Stanley W. Tucker (\$250)			
2253	3/24/98	R. Randy Croxton (\$50)	NA	NA	Endorsed to Stanley W. Tucker (\$50)
2254	3/24/98	Timothy L. Smoot (\$50)			
2255	3/24/98	Catherine D. Lockhart (\$50)	1203	3/27/98	Stanley W. Tucker (\$50)
2256	3/24/98	Stanley W. Tucker (\$50)	2299	3/30/98	Ben Cardin for Congress (\$200)

REIMBURSEMENT CONTRIBUTION TRANSACTIONS

MMG, INC. CHECK NO.	DATE	PAYEE	PERSONAL CHECK NO.	DATE	PAYEE
2331	4/21/98	Stanley W. Tucker (\$250)	2341	4/27/98	Milkulski for Senate (\$500)
2332	4/21/98	R. Randy Croxton (\$250)	NA	NA	Endorsed to Stanley W. Tucker (\$250)
2333	4/21/98	Catherine D. Lockhart (\$250)	1250	4/27/98	Milkulski for Senate (\$250)
2334	4/21/98	Timothy L. Smoot (\$250)	3672	4/27/98	Milkulski for Senate (\$250)
2355	5/4/98	R. Randy Croxton (\$250)	NA	NA	Endorsed to Stanley W. Tucker (\$250)
2356	5/4/98	Stanley W. Tucker (\$250)	2372	5/18/98	Carol Mosely-Braun for Senate (\$500)
2357	5/4/98	Catherine D. Lockhart (\$250)	NA	NA	Endorsed to Stanley W. Tucker (\$250)
2358	5/4/98	Timothy L. Smoot (\$250)	NA	NA	Endorsed to Stanley W. Tucker (\$250)

MSBDA MANAGEMENT GROUP, INC.
525 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21202
1177 525

Exhibit 3

1898
CHECK NO

OCT 14, 1997 \$250.00
DATE AMOUNT

Memo:

PAY TO THE ORDER OF
Two Hundred Fifty and 0/100 Dollars
CATHERINE D. LOCKHART

Catherine D. Lockhart
AUTHORIZED SIGNATURE

⑈001898⑈ ⑆052001772⑆ ⑆1100033008⑈ ⑆0000025000⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK, ⑆

MSBDA MANAGEMENT GROUP, INC.
525 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21202
1177 525

1899

1899
CHECK NO

OCT 14, 1997 \$250.00
DATE AMOUNT

Memo:

PAY TO THE ORDER OF
Two Hundred Fifty and 0/100 Dollars
TIMOTHY L. SMOOT

Timothy L. Smoot
AUTHORIZED SIGNATURE

⑈001899⑈ ⑆052001772⑆ ⑆1100033008⑈ ⑆0000025000⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK, ⑆

MSBDA MANAGEMENT GROUP, INC.
525 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21202
1177 525

1900

1900
CHECK NO

OCT 14, 1997 \$250.00
DATE AMOUNT

Memo:

PAY TO THE ORDER OF
Two Hundred Fifty and 0/100 Dollars
STANLEY W. TUCKER

Stanley W. Tucker
AUTHORIZED SIGNATURE

⑈001900⑈ ⑆052001772⑆ ⑆1100033008⑈ ⑆0000025000⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK, ⑆

MSBDA MANAGEMENT GROUP, INC.
525 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21202
1177 525

2253

2253
CHECK NO

MAY 24, 1998 \$500.00
DATE AMOUNT

Memo:

PAY TO THE ORDER OF
Fifty and 0/100 Dollars
R. RANDY CROXTON

Randy Croxton
AUTHORIZED SIGNATURE

⑈002253⑈ ⑆052001772⑆ ⑆1100033008⑈ ⑆0000005000⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK, ⑆

MSBDA MANAGEMENT GROUP, INC.
525 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21202
1177 525

1901

1901
CHECK NO
OCT 14, 1997 \$250.00
DATE AMOUNT

Memo:

PAY TO THE ORDER OF
Two Hundred Fifty and 0/100 Dollars
R. RANDY CROXTON

Randy Croxton
AUTHORIZED SIGNATURE

⑈001901⑈ ⑆052001772⑆ ⑆1100033008⑈ ⑆0000025000⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK, ⑆

Barry Carter
Pay to the order of Treasury
SMOOTH *Stanley W. Tucker*
ALL DEBIT OF CASH *211.00*
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Carter

Stanley W. Tucker


Stanley W. Tucker

Stanley W. Tucker


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CASH

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E.S.
CASH

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0520-C027-8
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2167

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21202

MSBDOFA MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

Feb 3, 1998\$250.00
DATE AMOUNT

2167
CHECK NO

Memo:

PAY TO THE ORDER OF Two Hundred Fifty and 0/100 Dollars

STANLEY W. TUCKER

Callahan

⑈002167⑈ ⑆052001772⑆ ⑆1100033008⑈ ⑆0000025000⑈

Wells Bank

MSBDOFA MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21202
7-1771520

2164
CHECK NO

Feb 3, 1998
DATE

*****\$250.00
AMOUNT

Memo:

PAY TO THE ORDER OF

Two Hundred Fifty and 0/100 Dollars

R. RANDY ROCKTON

Callahan

⑈002164⑈ ⑆052001772⑆ ⑆1100033008⑈ ⑆0000025000⑈

A SECURITY FEATURES INCLUDED. DETAILS ON BACK.

Wells Bank

MSBDOFA MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21202
7-1771520

2165
CHECK NO

Feb 3, 1998
DATE

*****\$250.00
AMOUNT

Memo:

PAY TO THE ORDER OF

Two Hundred Fifty and 0/100 Dollars

TIMOTHY L. SMOOT

Callahan

⑈002165⑈ ⑆052001772⑆ ⑆1100033008⑈ ⑆0000025000⑈

A SECURITY FEATURES INCLUDED. DETAILS ON BACK.

MSBDOFA MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21202
7-1771520

2165
CHECK NO.

Feb 3, 1998
DATE

*****\$250.00
AMOUNT

Memo:

PAY TO THE ORDER OF

Two Hundred Fifty and 0/100 Dollars

CATHERINE D. LOCKHART

Callahan

⑈002165⑈ ⑆052001772⑆ ⑆1100033008⑈ ⑆0000025000⑈

A SECURITY FEATURES INCLUDED. DETAILS ON BACK.

⑈0000025000⑈

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PC-200003

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MSBDA MANAGEMENT GROUP, INC.
204 EAST BALTIMORE STREET
BALTIMORE, MD 21202

2256
CHECK NO

MAR 24, 1998
DATE

Memo:

PAY
TO THE FIFTY AND 0/100 DOLLARS
ORDER
OF
CATHERINE D. LOCKHART

⑈002256⑈ ⑆052001772⑆ ⑆1100033008⑈

⑈0000005000⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK B

MSBDA MANAGEMENT GROUP, INC.
204 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21201
7-177/520

2256
CHECK NO

MAR 24, 1998
DATE

Memo:

PAY
TO THE FIFTY AND 0/100 DOLLARS
ORDER
OF
STANLEY W. TUCKER

⑈002256⑈ ⑆052001772⑆ ⑆1100033008⑈

⑈0000005000⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK B

MSBDA MANAGEMENT GROUP, INC.
204 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21201
7-177/520

2256
CHECK NO

MAR 24, 1998
DATE

Memo:

PAY
TO THE FIFTY AND 0/100 DOLLARS
ORDER
OF
STANLEY W. TUCKER

⑈002256⑈ ⑆052001772⑆ ⑆1100033008⑈

⑈0000005000⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK B

MSBDA MANAGEMENT GROUP, INC.
204 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21201
7-177/520

2331
CHECK NO

APR 01, 1998
DATE

PAY
TO THE TWO HUNDRED FIFTY AND 0/100 DOLLARS
ORDER
OF
STANLEY W. TUCKER

⑈002331⑈ ⑆052001772⑆ ⑆1100033008⑈

⑈0000025000⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK B

MSBDA MANAGEMENT GROUP, INC.
204 EAST BALTIMORE STREET
BALTIMORE, MD 21202

APR 01, 1998
DATE

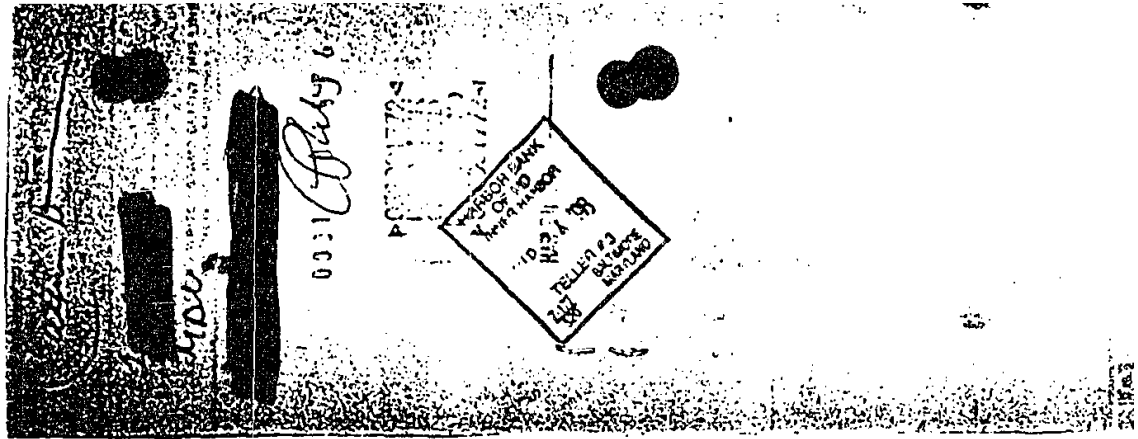
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Memo:

PAY
TO THE TWO HUNDRED FIFTY AND 0/100 DOLLARS
ORDER
OF
STANLEY W. TUCKER

⑈002331⑈ ⑆052001772⑆ ⑆1100033008⑈

SECURITY FEATURES INCLUDED: DETAILS ON BACK B



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MSBDA MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21201
7-177520

2355

2355
CHECK NO.

May 4, 1998
DATE

*****\$250.00
AMOUNT

Memo:

PAY TO THE ORDER OF: Two Hundred Fifty and 0/100 Dollars

R. RANDY CROXTON


AUTHORIZED SIGNATURE

⑈002355⑈ ⑆052001772⑆ ⑆1100033008⑆

⑈0000025000⑈

SECURITY FEATURES INCLUDED. DETAILS ON BACK. II

MSBDA MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21201
7-177520

2334

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CHECK NO.

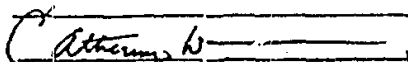
APR 21, 1998
DATE

*****\$250.00
AMOUNT

Memo:

PAY TO THE ORDER OF: Two Hundred Fifty and 0/100 Dollars

TIMOTHY L. SMART


AUTHORIZED SIGNATURE

⑈002334⑈ ⑆052001772⑆ ⑆1100033008⑆

⑈0000025000⑈

SECURITY FEATURES INCLUDED. DETAILS ON BACK. II

MSBDA MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21201
7-177520

2333

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CHECK NO.

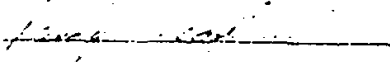
APR 21, 1998
DATE

*****\$250.00
AMOUNT

Memo:

PAY TO THE ORDER OF: Two Hundred Fifty and 0/100 Dollars

TIMOTHY L. SMART


AUTHORIZED SIGNATURE

⑈002333⑈ ⑆052001772⑆ ⑆1100033008⑆

⑈0000025000⑈

SECURITY FEATURES INCLUDED. DETAILS ON BACK. II

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Handwritten note:
Pay to the order of
Stanley Tucker
Stanley W. Tucker

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MSBDF MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21201
7-177/520

2358

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CHECK NO.

May 4, 1998
DATE

*****\$250.00
AMOUNT

Memo:

PAY
TO THE ORDER OF: Two Hundred Fifty and 0/100 Dollars
TIMOTHY L. SMOOT


AUTHORIZED SIGNATURE

⑈002358⑈ ⑆052001772⑆ ⑈1100033008⑈

⑈0000025000⑈

SECURITY FEATURES INCLUDED. DETAILS ON BACK. ⑈

MSBDF MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21201
7-177/520

2357

2357
CHECK NO.

May 4, 1998
DATE

*****\$250.00
AMOUNT

Memo:

PAY
TO THE ORDER OF: Two Hundred Fifty and 0/100 Dollars
CATHERINE D. LOCKHART


AUTHORIZED SIGNATURE

⑈002357⑈ ⑆052001772⑆ ⑈1100033008⑈

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SECURITY FEATURES INCLUDED. DETAILS ON BACK. ⑈

MSBDF MANAGEMENT GROUP, INC.
826 EAST BALTIMORE STREET
BALTIMORE, MD 21202

THE HARBOR BANK
OF MARYLAND
BALTIMORE, MD 21201
7-177/520

2356

2356
CHECK NO.

May 4, 1998
DATE

*****\$250.00
AMOUNT

Memo:

PAY
TO THE ORDER OF: Two Hundred Fifty and 0/100 Dollars
STANLEY W. TUCKER


AUTHORIZED SIGNATURE

⑈002356⑈ ⑆052001772⑆ ⑈1100033008⑈

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SECURITY FEATURES INCLUDED. DETAILS ON BACK. ⑈

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Stanley W. Tucker

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Attorney to
Pay to the order of:
Stanley W. Tucker
Stanley W. Tucker

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Stanley W. Tucker
Pay to the order of Stanley
Tucker
Stanley W. Tucker


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2/17/98 3567 500.00

 TIMOTHY L. SMOOT
[REDACTED]

2-17/98 3567
DATE FEB. 12, 1998

Five Hundred and no/100 DOLLARS \$ 500.00

THE HARBOR BANK
OF MARYLAND
CHESAPEAKE, VA 23029

[REDACTED]

2/17/98 3567 500.00

Catherine D. Lockhart
 3-17/533
 2nd Street N
 1203
 DATE 3/27/98
 PAY TO THE ORDER OF Philly W. Thorne \$ 50.00
 Fifty DOLLARS
 VFC HARBOR BANK
 OF MARIETTA
 BANKING AND TRUST
 3/27/98 1203 50.00

Catherine D. Lockhart
[Redacted]
1095
DATE *12/14/97*
PAY TO THE ORDER OF *Edgar James Conner* \$ *250.00*
Tim Andrew Smith DOLLARS
THE HARBOR BANK
OF MAINE
600 MAINE ST. PORTLAND, ME 04101
Catherine D. Lockhart

11/14/97

1095

250.00

X

100-443887-100

Catherine D. Larkins		1250
[REDACTED]		DATE 8/25/98
Medicare for [REDACTED]		\$ 2.50
The Bank of [REDACTED]		1250.00
HARBOR BANK (A MEMBER OF THE BANK OF AMERICA)		
[REDACTED]		

X

5/08/98 1250 250.00

STANLEY W. OR CYNTHIA A. TUCKER
2040
DATE 11/14/97
PAY TO THE ORDER OF *Wynn Lee Corporation* \$ 250.00
Two Hundred-Fifty DOLLARS
BY **HARBOR BANK**
OF MATTHEW
041007, 041001
Stanley W. Tucker

11/14/97

2040

250.00

STANLEY W. OR CYNTHIA A. TUCKER 2372
[REDACTED] May 15, 1998
PAY TO THE ORDER OF Carol M. [REDACTED] \$ 500.00
Five Hundred DOLLARS
BY HARBOR BANK
(BANK OF ALABAMA)
BIRMINGHAM, AL 35202
[REDACTED] Stanley W. Tucker

5/22/98 2372 500.00

X

STANLEY W. OR CYNTHIA A. TUCKER
MAIL April 27, 1978
PAY TO THE ORDER OF Mukulski For Services \$ 500.00
Five Hundred 005 0000 0041 14 75
HARBOR BANK
OF HARVARD
BANK STATE OF MASS.
Stanley W. Tucker


5/08/98

2341

500.00

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TIMOTHY L. SMOOT
 [Redacted Address]
 DATE *April 27, 1998* **JA 3672**
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**Informal Action of the Board of Directors and Stockholders of
MSBDFAManagement Group, Inc.**

June 5, 1998

The undersigned constituting all of the Directors and Stockholders of MSBDFAManagement Group, Inc., a Maryland corporation, (hereinafter referred to as the "Corporation"), in accordance with Sections 2-408(c) and 2-505 of the Corporations and Associations Article of the Annotated Code of Maryland, do hereby take the actions below set forth, and to evidence their waiver of any right to dissent from such actions, do hereby consent as follows:

RESOLVED: That the Corporation shall make no contribution of money, property or other thing of value to aid or promote the success or defeat of any political party or of any candidate for nomination for, or election to public or party office.

RESOLVED: That the foregoing Resolution may be modified or rescinded only upon the unanimous consent of the Stockholders and Directors of the Corporation.

This Informal Action of directors and Stockholders may be executed in counterparts.

WITNESS the execution hereof the day and year first above written.

BOARD OF DIRECTORS:

Stanley V. Tinsley
Arthur L. ...

[Signature]

STOCKHOLDERS:

Stanley V. Tinsley
Arthur L. ...

[Signature]