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February 24, 2000

4933

Xavier K. McDonnell  
Federal Election Commission  
Washington, DC 20463

RE: William Layden

Dear Mr. McDonnell:

Enclosed you will find information provided to me by William Layden pursuant to your most recent request. Please advise if additional information is required.

Thanking you, I am,

Yours truly,

Warren Gotcher

WG/sw  
Enclosure

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
FEB 29 3 26 PM '00

# LAYDEN, INC.

ATTORNEYS AT LAW  
320 E. CARL ALBERT PARKWAY  
P.O. BOX 1349  
McALESTER, OKLAHOMA 74502  
Phone (918) 423-6202  
Fax (918) 426-4160

JOHN E. LAYDEN  
1885-1956  
W.H. LAYDEN  
BILL LAYDEN  
JOE LAYDEN

February 22, 2000

FEB 29 3 25 PM '00

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Warren Gotcher  
Attorney at Law  
P.O. Box 160  
McAlester, OK 74502

Re: MUR 4933  
McAlester Industrial Credit Corporation, Inc.  
W.H. Layden

Dear Mr. Gotcher:

In response to the letter from the Federal Election Commission signed by Xavier K. McDonald, their attorney, to you asking for certain documents, the undersigned gives the following response:

Paragraph 1 of FEC letter states, "Your clients have not identified or produced a copy of the \$50,000.00 check from Francis Stipe to MIC."

Answer: Check copy, front and back attached hereto.

Paragraph 2 of FEC letter states, "Your clients indicate they have in their possession all check stubs for 1998."

Answer: Enclosed copy of all check stubs for year 1998 of McAlester Industrial Credit Company, aka McAlester Industrial Credit Corporation, Inc. and thereon is highlighted, the receipt of the \$50,000.00 from Mr. Stipe and a check stub showing \$50,000.00 check to Mr. Roberts. These check stubs do not indicate any of the following, to-wit: the repayment of the \$50,000.00 loan by Mr. Roberts; the payment of any interest to Mr. Roberts; the repayment of the \$50,000.00 to Mr. Stipe; and the payment of any interest to Mr. Stipe.

In paragraph 3 the FEC requests 'identity of Edward Jones Account Statement'. In particular, identify all persons and/or institutions which have an interest in the account and whether this is a personal account of Mr. Layden, and account of MIC, or both?

In response to the above questions, the account is now owned by W.H. Layden. The account was formerly owned by MIC, but was transferred as part of the dissolution process of MIC.

Paragraph 4 of the FEC letter states as follows, "It does not appear that your clients have identified and produced documents showing the repayment of the loan to Mr. Stipe, and any interest paid to Mr. Stipe. As stated in our last letter, such documents are responsive to the Commission's subpoena and order.

To comply with outstanding discovery, your clients must identify and produce:

- A. Bank statements showing deduction of funds from the account of Mr. Layden or MIC.
- B. Copy of any checks or wire transfers showing repayment;
- C. All documents related to communications with Mr. Stipe relating to or acknowledging the repayment, e.g. a copy of the note indicating that it was paid in full.

In response FEC's paragraph 4, the undersigned responds as follows: attached hereto are the following documents.

1. Statement of account at Edward Jones, March 27-April 30 which shows deposit and transfers in of \$50,000.00, highlighted. It also shows a deposit of cashier's check from the Bank NA of \$50,000.00. The account also shows on 4/21 check no. 15 in the amount of \$50,000.00 highlighted on the account.
2. Also attached is a check no. 15 signed by W.H. Layden from the Edward Jones Account to Francis Stipe with the statement, "Redeem - Investment Note of LIC CERT. On the reverse side of that copy shows the reverse side of that check.
3. Also attached is the front and back of a check from W.H. Layden to Francis Stipe for \$41.58, labeled Int.
4. As to the further request under subparagraph c, all documents relating to communication with Mr. Stipe related to or acknowledging the repayment e.g. a copy of the note indicating it was paid in full. The undersigned states that there was no communication with Mr. Stipe relating to or acknowledging the repayment.
5. The investment note, which you were furnished a copy, was not endorsed as being paid in full, nor was a copy furnished to Mr. Stipe by Mr. Layden.

Paragraph 5 of FEC letter states, "Edward Jones Account statement shows a deduction - on an undisclosed date. Your clients have not given any indication whether this payment was for Mr. Stipe or identified the account statement as requested. If the deduction was repayment to Mr. Stipe, have your client state so under oath, and provide a complete copy of that account statement (showing the date of the subtraction').

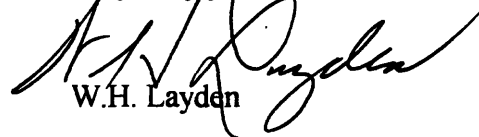
In response to the FEC request no. 5, the undersigned states as follows:

There was not an Edward Jones account statement showing a deduction at any particular date. That account showed deduction for all of the checks deducted in the amount of These checks consisted of Stipe check for \$50,000.00, dated 4/19/99; a check on 4/14/99 to United States Treasury for which was to pay W.H. Layden's income tax for the year 1998, and check dated 4/14/99 of to the Oklahoma Tax Commission to pay income tax of W.H Layden for 1998. Copies of those checks and the backs thereof are enclosed.

Paragraph 6 of the FEC letter states, "Response refers to a 'spreadsheet' containing irrelevant information, and it does not appear that such a document has been produced. Have your client produce that spreadsheet."

In response to the FEC request no. 6, the undersigned attaches hereto the spreadsheet of LCIC beginning on June 17, 1998 through and including December 31, 1998. W.H. Layden further responds that the spreadsheet for January to June of 1998 had nothing whatsoever to do with the Stipe-Roberts transactions nor does a spreadsheet for the year 1999 show any transaction between Layden, Stipe or Roberts, from 1/1/98 to 6/17/98.

Very truly yours,

  
W.H. Layden

Attachments as follows:

1. Francis Stipe check of September 2, 1998, \$50,000.00 to Latimer Industrial Credit for Promissory Certificate.
2. Copies of all check stubs of Latimer County Industrial Credit from 4-1-98 to 12-31-98.
3. "Spreadsheet copy of LCIC spreadsheet from 6-7-98 to and including 12-31-98.
4. Copies of: Edward Jones Account from March 27 to April 30 showing a summary of investment activity which shows a deposit and transfers in of also showing a deposit and transfer in on April 5, 1999 for these amounts are highlighted.
5. Page from the Edward Jones Account showing a check no. 15, dated 4/21/99 in the amount of \$50,000.00. This is highlighted on the account.
6. A copy of check from W.H. Layden to Francis Stipe for the amount of \$50,000.00, dated 4/19/99, with the notation "redeem and investment note of LIC Cert., signed by W.H. Layden and the back of that check endorsed by Francis D. Stipe.

7. A copy of personal check of W.H. Layden account, dated 4/21/99 in the amount of \$41.58 to Francis Stipe showing INT as a notation and the back of said check.
8. Two checks, no. 12 and no. 14 from W.H. Layden daily passport cash trust with Edward Jones broker....one in the amount of                      to the U.S. Treasury for income tax of W.H. Layden for 1998 and a check to the Oklahoma Tax Commission, no. 14, to Oklahoma Tax Commission for                      for 1998 W.H. Layden income tax and the back of both of those checks.

2025-04-03 10:42

1093	9/9 19 98	Wallace 1000 Smith 2275 Culpeper 2000	85
TO	Karl Roberts	2420	2420
FOR	Loan 2200		
		TOTAL	51400
		THIS CHECK	-
		OTHER	

# 6

24.04.408.0423

W H LAYDEN  
P O BOX 1348  
MCALESTER, OK 74502-1348

DAILY PASSPORT CASH TRUST

15

5-2  
110

4/19/99

Pay to the  
Order of Francis Stipe

\$ 50,000.-

Fifty Thousand & 00/100

Dollars

**Edward Jones**

State Street Bank  
225 Franklin St.

NOT VALID FOR LESS THAN \$500.00

Serving Individual Investors Since 1873

Boston, MA 02101

Redem - Investment

For note of L.I.C. Cert

*[Signature]*

24.04.408.0424

*James D. Stephens*



Arms D.

#7  
400 043

W. H. LAYDEN 2-89

P. O. BOX 1348  
MC ALESTER, OK 74502

86-21/1031  
2127202

2951

DATE

4/21/99

PAY TO THE  
ORDER OF

Francis's Store

\$ 41.58

Forty One & 58/100

DOLLARS  Security features included. Check on back.

FIRST NATIONAL BANK & TRUST CO.  
MC ALESTER, OKLAHOMA 74501

Checking for 50+

MEMO

net

W. H. Layden

MP