



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR #

546

Date Filmed 12/28/78 Camera No. --- 2

Cameraman GPC

PS Form 3811 Apr 1977

RETURN RECEIPT REGISTERED INSURED AND CERTIFIED MAIL

MAIL 546-1-100/100
 • 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 ☐

☒ 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

*Wyoming Hospital Pol. Act. Com.
 480 Lexington St.
 P.O. Box 1024
 Cheyenne, WY 82001*

3 ARTICLE DESCRIPTION

REGISTERED NO. CERTIFIED NO. INSURED NO.

443790

(Always obtain signature of addressee or agent)

I have received this article described above:

SIGNATURE

Addressee

Authorized agent

Demetrius R...

DATE OF DELIVERY

POSTMARK

5 ADDRESS Complete only if requested

6 UNABLE TO DELIVER BECAUSE

CLERK'S

INITIALS

[Signature]

FEDERAL ELECTION COMMISSION

Memorandum concerning Open MUR

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☐ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☐ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

date

Robert L. Ford
November 2, 1977



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE

28 OCT 30 P 1: 21

October: 30, 1978

MEMORANDUM

TO: The Commissioners

FROM: William C. Oldake,

SUBJECT: MUR 546-78)

The recommendation on page 3 of the General Counsel's Report previously circulated to the Commission was stated incorrectly. The attached page reflects a correct recommendation and the action taken by the Commission at the October 25, 1978 meeting.

corporate funds or membership dues and therefore is not a violation of 2 U.S.C. §441b.

In considering the permissibility of the \$1,000 contribution to the WY-D-PAC, §102.6(b) of the Commission's Regulations which limits the funds acceptable by a political action committee was reviewed in light of the fact that the Associations soliciting and segregating of the voluntary donations was started prior to the time the PAC was created, therefore presenting an issue of whether these donations were designated to a federal committee such as WY-D-PAC. Since the donations were always designated to go for political education, this in itself would appear to encompass expenditures connected with federal elections. An even stronger argument, however, is the fact that the membership voted to transfer the funds to the the PAC (see the June 1975 letter). Clearly, the members intended their voluntary donations to go to WY-D-PAC.

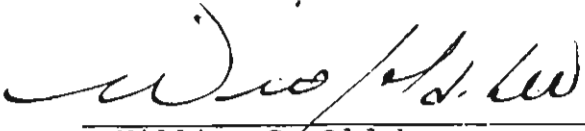
Furthermore, there is no §434(b) issue of failure to report individual contributions, since there is no indication that any dentist contributed in excess of \$100.

IV. RECOMMENDATION

Find no reasonable cause to believe that Wyoming Dental Association and the Wyoming Dental Political Action Committee violated 2 U.S.C. §441b, send the attached letters and close the file.

10/19/78

Date



William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

October 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. J. B. Whiting
Secretary-Treasurer
Wyoming Dental Association
345 Garfield
Lander, WY 82520

RE: MUR 546

Dear Dr. Whiting:

On October 25, 1978, the Federal Election Commission voted to find no reasonable cause to believe that a violation of 2 U.S.C. §441b has been committed by the Wyoming Dental Association.

Accordingly, and upon my recommendation, the Commission has decided to close the file in this matter.

If you have any further questions, please contact Judy Thedford, at 202/523-4057.

Sincerely,

A handwritten signature in dark ink, appearing to read 'William C. Oldaker', is written over a horizontal line.

William C. Oldaker
General Counsel

Enclosure

Commission Certification
General Counsel's Report

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. J. B. Whiting
Secretary-Treasurer
Wyoming Dental Association
345 Garfield
Lander, WY 82520

RE: MUR 546

Dear Dr. Whiting:

On October , 1978, the Federal Election Commission noted to find no reasonable cause to believe that a violation of 2 U.S.C. §441b has been committed by the Wyoming Dental Association.

Accordingly, and upon my recommendation, the Commission has decided to close the file in this matter.

If you have any further questions, please contact Judy Thedford, at 202/523-4057.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Commission Certification
General Counsel's Report

JA
10-26-78

78040080322
78040080322

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wyoming Dental Political Action
Committee
c/o Mr. Dennis M. Grant
P. O. Box 1025
Cheyenne, WY 82009

RE: MUR 546

Dear Mr. Grant:

On October 3, 1978, the Federal Election Commission voted to find no reasonable cause to believe that a violation of 2 U.S.C. §441b has been committed by your client, the Wyoming Dental Political Action Committee.

Accordingly, and upon my recommendation, the Commission has decided to close the file in this matter.

If you have any further questions, please contact Judy Thedford at 202/523-4057.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

Commission Certification
General Counsel's Report

JA
16-26-78



FEDERAL ELECTION COMMISSION

125 K STREET N.W.
WASHINGTON, D.C. 20463

October 27, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wyoming Dental Political Action
Committee
c/o Mr. Dennis M. Grant
P. O. Box 1025
Cheyenne, WY 82001

RE: MUR 546

Dear Mr. Grant:

On October 25, 1978, the Federal Election Commission voted to find no reasonable cause to believe that a violation of 2 U.S.C. §441b has been committed by your client, the Wyoming Dental Political Action Committee.

Accordingly, and upon my recommendation, the Commission has decided to close the file in this matter.

If you have any further questions, please contact Judy Thedford at 202/523-4057.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

Commission Certification
General Counsel's Report

7 3 0 1 0 7 3 0 3 2 1



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS
DATE: OCOTBER 23, 1978
SUBJECT: MUR 546 - General Counsel's Report
dated October 11, 1978;
Signed: 10-19-78; Received
in OCS: 10-20-78, 1:46

The above-named document was circulated on a 48
hour vote basis at 9:00, October 23, 1978.

Comm
~~Commissioner~~ Harris submitted an objection at
11:40, this date, thereby placing MUR 546 on the
Executive Session Agenda for October 25, 1978.

cc: Commissioner Harris

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Wyoming Dental Political Action) MUR 546 (78)
Committee)
Wyoming Dental Association)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on October 25, 1978, the Commission, meeting in an Executive Session at which a quorum was present, determined by a vote of 5-0 to adopt the recommendation of the General Counsel to take the following actions in MUR 546 (78):

1. Find no reasonable cause to believe that Wyoming Dental Association and the Wyoming Dental PAC violated 2 U.S.C. §441b.
2. Approve the letter attached to the General Counsel's Report on MUR 546 (78) dated October 19, 1978.
3. Close the file in MUR 546 (78).

Commissioners Aikens, Harris, Springer, Thomson, and Tiernan voted affirmatively for this action.

Accordingly, the file in this matter has been closed.

Attest:

10/27/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

78 OCT 12 P 1: 46 BEFORE THE FEDERAL ELECTION COMMISSION
October 11, 1978

In the Matter of)
Wyoming Dental Political Action) MUR 546 (78)
Committee)
Wyoming Dental Association)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was internally generated through the Reports Analysis Division. The matter was referred to the Office of the General Counsel after a review of reports indicated that a violation of 2 U.S.C. §441b might have been committed. The October 10, 1977 Quarterly Report of the Wyoming Dental Political Action Committee (WY-D-PAC) reported a \$1,000 transfer from its parent organization, the Wyoming Dental Association ("the Association"). The Corporate Division of the Wyoming Secretary of State's office was contacted and stated that the Association was incorporated.

A surface violation letter was sent to the WY-D-PAC from the Reports Analysis Division; the response received was inadequate. On June 7, 1978, the Commission found reason to believe that a violation of 2 U.S.C. §441b may have been committed by the WY-D-PAC and the Association. Both respondents were sent reason to believe notices. The WY-D-PAC failed to submit a response; however, the Association responded on August 14, 1978.

To obtain more details pertaining to the specific transaction, the WY-D-PAC and the Association were issued orders to answer interrogatories on August 28, 1978. The responses were received by the Commission on September 19, 1978.

II. EVIDENCE

From the responses submitted to the Commission, it appears that in June 1969, the Association voted to seek donations of \$10 per dentist per year for political education. To accommodate the donations, a separate bank account #0004432 was opened by the Association in January 1970. Contributions were then solicited from the members on a voluntary basis and deposited into account #0004432.

On November 24, 1974, the WY-D-PAC registered with the Clerk of the House of Representatives and listed the Wyoming Dental Association as its parent organization. In June 1975, the Association membership voted to transfer the political education funds to the newly created PAC. (See Attachment A). Counsel was sought as to the legality of transferring the funds. The Association's attorney, William C. Beaman, instructed the Association to transfer \$1,000 per year to the PAC. (See Attachment B.).

The September 2, 1977 transfer of \$1,000 at issue is the yearly transfer from the political education fund to the WY-D-PAC.

III. ANALYSIS

The reported \$1,000 transfer is clearly within the definition of a contribution as set forth in 2 U.S.C. §431(e). However, the account from which the \$1,000 contribution was made consists of individual contributions from dentists who contributed voluntarily to the political education fund in 1969-1975. As stated in Mr. Beaman's letter and Dr. Whiting's sworn responses, the funds solicited to the political education fund were distinguishable from membership dues, deposited into a separate account #0004432, and not commingled with the Association's other accounts. Therefore, the \$1,000 transfer does not appear to be

corporate funds or membership dues and therefore is not a violation of 2 U.S.C. §441b.

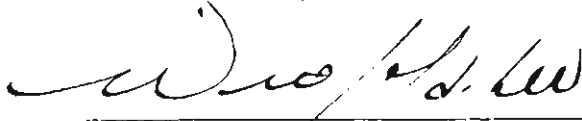
In considering the permissibility of the \$1,000 contribution to the WY-D-PAC, §102.6(b) of the Commission's Regulations which limits the funds acceptable by a political action committee was reviewed in light of the fact that the Associations soliciting and segregating of the voluntary donations was started prior to the time the PAC was created, therefore presenting an issue of whether these donations were designated to a federal committee such as WY-D-PAC. Since the donations were always designated to go for political education, this in itself would appear to encompass expenditures connected with federal elections. An even stronger argument, however, is the fact that the membership voted to transfer the funds to the the PAC (see the June 1975 letter). Clearly, the members intended their voluntary donations to go to WY-D-PAC.

Furthermore, there is no §434(b) issue of failure to report individual contributions, since there is no indication that any dentist contributed in excess of \$100.

IV. RECOMMENDATION

Find no reasonable cause to believe that Wyoming Dental Association and the Wyoming Dental Political Action Committee violated 2 U.S.C. §441b, send the attached letters and close the file.

10/19/78
Date


William C. Oldaker
General Counsel

ATTACHMENTS:

Attachment A

Attachment B

Letters

7 2 0 7 3 0 3 17 0 2 0 1 0 2 4 5 5 0
7 3 0 1 0 0 3 0 3 0 1

Dr. Frank T. Manning, President
Medical Arts Building
Thermopolis, Wyoming 82443

June 23, 1975

John Emsay, D.D.S.
3003 Central Avenue
Cheyenne,
Wyoming 82001

Dear John,

As you are aware the membership of the Wyoming Dental Association voted to transfer the money from our political education fund to KYO-EPAC. There seemed to be a good deal of confusion as to the legality of doing this as well as how these funds would be used. As I told you on the phone, I personally feel that all needs to be done is to write the check.

However, I think we should satisfy all the membership on these matters. Would you have Bill Beaman send me a letter regarding the transfer of this money? Have him explain in the letter how the money originally was collected, how it can be used after it is transferred and the sort of control the contributing members will have over its use.

I think resolutions that call for transfer of funds or matters that require a legal opinion should be checked quite closely by the officers of the association before they proceed to carry them out. I know you agree, and I appreciate your help.

Sincerely,

Frank T. Manning, D.D.S.

FTM:io

CC: Cordelia Hoffman, D.D.S.
George Ewan, D.D.S.
Orval Kildebeck, D.D.S.
Mrs. Wilma Hoffman

ATTACHMENT A

BEAMAN & GALEOTOS

Attorneys and Counselors at Law

220 WEST 24TH STREET

POST OFFICE BOX 1004

CHEYENNE, WYOMING 82001

TELEPHONE 307/632-6020

July 22, 1975

WILLIAM C. BEAMAN
PAUL S. GALEOTOS

Dr. Frank T. Manning, D.D.S.
President, Wyoming Dental Association
Medical Arts Building
Thermopolis, Wyoming 82443

Re: WYO-DPAC

Dear Doctor Manning:

I am in receipt of a copy of your letter addressed to John Esmay, dated June 23, 1975, requesting that I answer and explain certain questions.

The first question I want to deal with concerns the transfer of money from the political education fund to WYO-DPAC. Pursuant to 2 U.S.C. Section 431 (d) (e) and (f), as amended, of the Federal Election Campaign Act, any transfer of funds to WYO-DPAC from the political education fund in excess of \$1,000.00 would be treated as a contribution or expenditure from a "political committee" and in violation of the law, unless the transferor (the Wyoming Dental Association in this case) is a registered political committee, e.g. WYO-DPAC. Consequently, if the amount in the political education fund is in excess of \$1,000.00, you should transfer only \$1,000.00 to WYO-DPAC.

With regard to your question asking how the money was originally collected, I understand that a request for a voluntary contribution from every member of the Wyoming Dental Association in the amount of \$10.00 was included on the statement for dues and that such contributions were transferred to the political education fund. It should be pointed out that once this money finds its way into WYO-DPAC, it can be expended for the purpose of influencing the nomination for election, or the election, of any person seeking Federal office, or the office of President and Vice-President, or it can be used for the purpose of influencing the results of a primary election held for the selection of delegates to a national nominating convention of a political party or for the expressions of a preference for the nomination of persons for election to the office of President of the United States. (See 2 U.S.C. Section 431(e) and (f), as amended). Also under Federal law a political committee may transfer funds to another political committee. Federal law forbids, however, contributions "... to any candidate with respect to any election for Federal office

ATTACHMENT B

Dr. Manning
Page 2
July 22, 1975

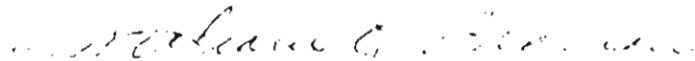
which, in the aggregate, exceed \$5,000.00 2 U.S.C. Section 431, as amended.

As you are probably aware, the "Frisby Amendment" has been amended this past session of the Wyoming Legislature. This new amendment only permits "natural persons" to make contributions in order to aid, promote or prevent the nomination or election of any candidate or to aid or promote the intents, successes or defeat of any political party. [See Chapter 185, Session Laws of Wyoming, 1975, Section 22.1-389(d).] However, this provision does not forbid political parties from receiving contributions from sources other than "natural persons", such as political action committees. I double-checked this exception with John R. Smyth, D. Laramie County, Wyoming House of Representatives, who was actively involved with this Bill, and he stated that a political action committee could contribute funds to a political party and not violate State law.

Finally, with regard to the question of the control contributing members have or, the use of the money, it appears that neither the State or Federal Government has made provisions regarding such control. The Federal law does prescribe that no expenditure is to be made for or on behalf of a political committee without the authorization of the committee's chairman or treasurer or their designated agents. 2 U.S.C., Section 432(a).

I sincerely hope this letter has cleared up many of your questions; and if it has not, or if you have other questions, please feel free to call upon me and I will do my best to answer them.

Sincerely yours,



William C. Beaman

WCB:be

cc: Dr. H. Paul Fanning
Dr. J.C. Esmay
Dr. Joseph Devine



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. J. B. Whiting
Secretary-Treasurer
Wyoming Dental Association
345 Garfield
Lander, WY 82520

RE: MUR 546

Dear Dr. Whiting:

On October , 1978, the Federal Election Commission voted to find no reasonable cause to believe that a violation of 2 U.S.C. §441b has been committed by the Wyoming Dental Association.

Accordingly, and upon my recommendation, the Commission has decided to close the file in this matter.

If you have any further questions, please contact Judy Thedford, at 202/523-4057.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

Commission Certification
General Counsel's Report



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wyoming Dental Political Action
Committee
c/o Mr. Dennis M. Grant
P. O. Box 1025
Cheyenne, WY 82001

RE: MUR 546

Dear Mr. Grant:

On October , 1978, the Federal Election Commission voted to find no reasonable cause to believe that a violation of 2 U.S.C. §441b has been committed by your client, the Wyoming Dental Political Action Committee.

Accordingly, and upon my recommendation, the Commission has decided to close the file in this matter.

If you have any further questions, please contact Judy Thedford at 202/523-4057.

Sincerely,

William C. Oldaker
General Counsel

Enclosures

Commission Certification
General Counsel's Report



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: SEPTEMBER 26, 1978
SUBJECT: MUR 546 (78) - Interim Report dated
9-19-78. Signed: 9-22-78
Received in OCS 9-22-78,
2:33

The above-named document was circulated on a 24
hour no-objection basis at 10:00 a.m., September 25, 1978.

The Commission Secretary's Office has received
no objections to the Interim Report as of 11:30 this
date.

[illegible]

MUR 546 (78)

The respondents received their orders on September 2, 1978. On September 12, 1978, Dr. Whiting, Secretary-Treasurer of the Wyoming Dental Association and Mr. Grant, counsel for the Wyoming Dental Political Action Committee, phoned the Commission and stated that their responses would be in the mail that day. We received the responses on September 19, 1978. We are currently reviewing and analyzing the responses and hope to make a recommendation to the Commission shortly.


William E. Oldaker
General Counsel



Wyoming Dental Association

Sent. 6 SEP 19 1978 4918 A12:37

806294

President

Dr. O.C. Kildebeck
211 E. 20th Ave.
Torrington, WY 82240

FEDERAL ELECTION COMMISSION
1325 K Street N.W.
Washington, D.C. 20463

President Elect

Dr. Scott M. Welch
84 Park Ave.
Lovel, WY 82431

Re: MUR 546

Answers to Interrogatories of Aug. 29, 1978:

Vice President

Dr. Roy N. Peach
211 W. 9th St.
Casper WY 82601

Secretary-Treasurer

Dr. J.B. Whiting
345 Garfield
Lander, WY 82520

Executive Secretary

Audrey J. Dugger
640 Ave. G.
Powell, WY 82435

1. Wyoming Dental Association has five bank accounts. (Started in the home towns of the past secretary-treasurers).
2. 1st National Bank of Casper #0852251 (checking)
1st National Bank of Powell #050729-20 (savings)
Provident Federal Savings & Loan #01-060-3663 (relief fund)
Provident Federal Savings & Loan #01-0026045 (relief fund)
Capitol Savings and Loan #05-0004432 (political ed.)
3. Capitol Savings and Loan #05-0004432 (Riverton)
4. As of June 30, 1978 \$1851.66. (I held up the \$1,000 for 1978 until this matter is resolved).
5. Funds were solicited from dentists in Wyoming on a voluntary basis for political education.
6. In our annual meeting, June 1969, we decided to donate \$10.00 per dentist per year.
7. no. A separate account was set up for this purpose in Jan. 1970. Funds have not been deposited into it since Feb 18, 1975.
8. Nothing now. It collects interest inbetween yearly withdrawals of \$1,000.00 since 1975. (See letter from Deaman & Galeatos dated July 27, 1975 so advising us).
9. Nothing since Dec. 11, 1974. Prior to that time some was used for mailings, phone, and political education.
10. no.
11. no. Not to my knowledge.
12. no. \$10.00 is what was originally asked for.. In 1974 some gave \$20.00. (See copy of our dues statement).

9-7-78
Notary: Stanley Byrge
Exp. Date 6-28-82

Sincerely,
J. Bruce Whiting DDS
Sec-Treas WDA

SAVINGS ACCOUNT

NAME Wyoming State Dental Association - Political Action Fund ACCOUNT NO. 4432

WITHDRAWAL	EARNINGS	DIVIDEND	SAVINGS ADDED	DATE	MEMO	BALANCE
			710.00	JAN 13 '70		710.00
				MAR 31 '70		715.98
			620.00	APR 13 '70		1,335.98
			50.00	MAY 14 '70		1,385.98
				JUN 30 '70		1,381.75
			30.00	JUL 10 '70		1,411.75
			17.75	Sept 30 -70		1,429.50
200.00				Dec. 4 -70		1,229.50
			17.25	Dec. 31 -70		1,246.75
			310.00	FEB 25 '71		1,556.75
				MAR 31 '71		2,578.40
			32.14	JUN 30 '71		2,610.54
607.84				JUL 14 '71		2,002.70
			26.32	SEP 30 '71		2,029.02
114.93				DEC 7 '71		1,914.09
				JUL 31 '71		1,939.27
			934.04	MAR 3 '72		1,074.21
				MAR 22 '72		2,901.91
965.00				JUN 22 '72		1,936.91

THIS BOOK IS YOUR RECEIPT
PRESENT IT FOR EACH TRANSACTION.

CAPITOL SAVINGS & LOAN ASSOCIATION

WITHDRAWAL

ADDED

2,17.00

27115
265277
275295
175277

105.17
131.17
102752



708

SEP 19 11:2:37

Wyoming Dental Association
J.B. Whiting, DDS
345 East 1st St.
Lander, Wyoming 82501

REGISTERED NO. 4938

RETURN RECEIPT
REQUESTED

1970-1971, L.C. 1970-1971
1970-1971, L.C. 1970-1971
1970-1971, L.C. 1970-1971

[illegible]

UNITED STATE OF AMERICA

FEDERAL ELECTION COMMISSION

SEP 19 12:38

In the Matter of)
)
 Wyoming Dental Political) RE: MUR 546
 Action Committee)

ANSWERS TO INTERROGATORIES

COMES NOW the Wyoming Dental Political Action Committee, by and through their Secretary, Robert C. Brown, and respectfully presents their Answers to the Interrogatories previously served on them:

1. No, the funds received by the Wyoming Dental Political Action Committee (hereinafter referred to as WY-D-PAC) were funds received from the Wyoming Dental Association (hereinafter referred to as WY-D-A), and to the best of WY-D-PAC's information and belief such funds were not a "contribution" pursuant to the terms of 2 U. S. C. Section 431(d), 431(e) (3) and 431(f) (3).

WY-D-A is a non-profit organization, organized under the laws of the State of Wyoming, and whose membership is composed of individual dentists that practice in Wyoming. Prior to the formation of WY-D-PAC, the WY-D-A had established a separate fund for political education purposes. The funds in the WY-D-A political education fund were from voluntary contributions from individual dentists made in individual contributions of \$10.00 each. WY-D-PAC was created by and within the WY-D-A in an attempt to comply with all requirements of the Federal Election Campaign Act.

2. The officers of WY-D-PAC are also members and sometimes officers of WY-D-A, and as such had prior knowledge that the source of the funds transferred to WY-D-PAC were from the "political education fund" of WY-D-A. Also see answer number 1 above. (attached hereto is a copy of a letter from Dr. Frank T. Manning, President at the time, dated June 23, 1975, to John Esmay D.D.S., officer of WY-D-PAC, on the source of the funds marked as EXHIBIT "A", and also attached is a letter from William C. Beaman, Attorney for WY-D-PAC to Dr. Manning, dated July 22, 1975, in response to Dr. Mannings' letter, marked as EXHIBIT "B").

3. The funds received by WY-D-PAC from WY-D-A were in the form of a check drawn on the checking account in the name of WY-D-A.

4. The name on the check was WY-D-A, the check was in the amount of \$1000.00, and was dated September 2, 1977, and was signed by J. Bruce Whiting, D. D. S., Secretary-Treasurer of WY-D-A.

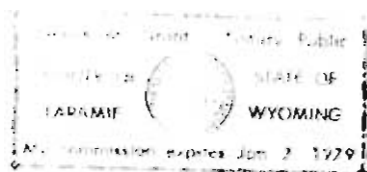
7 9 0 1 0 8 3 4

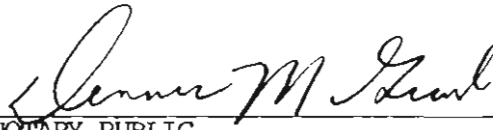
DATED this 12th day of September, 1978.


ROBERT C. BROWN, D. D. S.
Secretary-Wyoming Dental
Political Action Committee

STATE OF WYOMING)
) SS:
COUNTY OF LARAMIE)

The foregoing Answers to Interrogatories was subscribed and sworn to before me by ROBERT C. BROWN this 12th day of September, 1978.




NOTARY PUBLIC

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Answers to Interrogatories were served by mailing a copy thereof, by certified mail, postage prepaid, to Federal Election Commission, 1325 K Street, N. W., Washington, D. C. 20463, to the attention of Office of the General Counsel, this 12th day of September, 1978.


DENNIS M. GRANT

OSBORN, GRANT & GRANT
ATTORNEYS AT LAW

405 AMERICAN NATIONAL BANK BLDG
P O BOX 1025
CHEYENNE, WYOMING 82001

Certified Mail:
Return Receipt requested:

CERTIFIED

No. 527350

MAIL

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Attention: Office of the General Counsel



THOMAS JEFFERSON





FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

August 29, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. J.B. Whiting, Secretary-Treasurer
Wyoming Dental Association
345 Garfield
Lander, WY 82520

Re: MUR 546 (78)

Dear Dr. Whiting:

This is to acknowledge receipt of your August 9, 1978 letter responding to the Commission's reason to believe determination letter.

After reviewing your response, we feel further clarification of the specific \$1,000 transfer on September 2, 1977 from your association to the Wyoming Dental Political Action Committee is necessary. Enclosed is an order issued by the Federal Election Commission requiring you to answer questions in connection with this matter. Your responses are required to be submitted within ten days after receipt of this letter.

Sincerely,

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

William C. Oldaker
General Counsel

Enclosure

MUR 546 Thread

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)
☐ 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
 Dr. J. B. White
 Wyoming Bldg. 1132
 345 East 1st
 Laramie, WY 82001

3. ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 438442

(Always obtain signature of addressee or agent)

I have received the article described above
 SIGNATURE ☐ Addressee ☐ Authorized agent
 4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE CLERK'S INITIALS

FEDERAL ELECTION COMMISSION

In the Matter of)
) RE: MUR 546
Wyoming Dental Association)

ORDER

TO: Dr. J. B. Whiting, Secretary-Treasurer
345 Garfield
Lander, WY 82520

PURSUANT to the authority set forth in Section 437d(a)(1) of Title 2, United States Code, and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the attached interrogatories. The answers must be submitted under oath, within ten (10) days of your receipt of this Order, to the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Office of General Counsel.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set her hand at Washington, D.C., on this, the 28th day of August, 1978.

Joan D. Aikens
Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons
Marjorie W. Emmons
Marjorie W. Emmons

1. How many bank accounts does the Wyoming Dental Association maintain?
2. What are the names and account numbers of the bank accounts identified in #1?
3. From which account (identify by account number and name) was the \$1,000 transfer to Wyoming Dental Political Action Committee (WY-D-PAC) drawn?
4. What funds are contained in the account from which the \$1,000 transfer to WY-D-PAC was drawn?
5. If funds were solicited to the account from which the \$1,000 transfer to WY-D-PAC was drawn, from whom were the funds solicited?
6. If funds were solicited to the account from which the \$1,000 transfer to the WY-D-PAC was drawn, how were these funds solicited?
7. If funds were solicited to the account from which the \$1,000 transfer was made to the WY-D-PAC, were those funds ever deposited into any other account?
8. What is the money in the account from which the \$1,000 transfer was made to WY-D-PAC currently being used for?
9. What was the money in the account from which the \$1,000 transfer was made to WY-D-PAC used for before September 2, 1977?
10. Was the account from which the \$1,000 was transferred to the WY-D-PAC ever registered with the Commission?
11. Does the account from which the \$1,000 was transferred to WY-D-PAC contain any funds prohibited by the FECA?
12. If funds were solicited to the account from which the \$1,000 transfer was made to the WY-D-PAC, has any one person contributed in excess of \$50 to this account? If so, are these individuals identified?



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 29, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wyoming Dental Political Action
Committee
c/o Mr. Dennis Grant
P.O. Box 1025
Cheyenne, WY 82001

Re: MUR 546 (78)

Dear Mr. Grant:

Enclosed is an order issued by the Federal Election Commission requiring your client, Wyoming Dental Political Action Committee, to answer questions in connection with MUR 546. Your responses are required to be submitted within ten days of your receipt of this letter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

PS Form 3811 April 1977

MUR 546 - THEODORE

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)
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☐ 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
WYOMING DENTAL POLITICAL ACTION
COMMITTEE
c/o Mr. Dennis Grant
P.O. Box 1025, Cheyenne, WY 82001

3. ARTICLE DESCRIPTION
REGISTERED NO. 438434 INSURED NO.

(Always obtain signature of addressee or agent)
I have received the article described above
SIGNATURE / 11 Addressee AUTHORIZED agent
DATE OF DELIVERY POSTMARK

5 ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

★OPD 1977-0-249 585

FEDERAL ELECTION COMMISSION

RE: MUR 546

ORDER

Cheyenne, WY 82001

of the General Counsel.

August , 1978.

Joan D. Aikens
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

- 1) Did the Wyoming Dental Political Action Committee (WY-D-PAC) accept a \$1,000 contribution from the Wyoming Dental Association on September 2, 1977?
- 2) If the WY-D-PAC accepted a \$1,000 contribution from the Wyoming Dental Association, what actions were taken by the PAC to assure that the contribution was not from corporate funds?
- 3) If the WY-D-PAC accepted a \$1,000 contribution from the Wyoming Dental Association, in what form was the \$1,000 contributed?
- 4) If the WY-D-PAC accepted a \$1,000 contribution from Wyoming Dental Association in the form of a check or money order, state the name and number which appeared on the check or the money order?
- 5) If the WY-D-PAC did not accept a \$1,000 contribution from the Wyoming Dental Association, who contributed the \$1,000 on September 2, 1977 (if the \$1000 was made up of more than one contribution, identify the contributors and the amounts of each contribution)?

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Wyoming Dental Association) MUR 546 (78)
Wyoming Dental Political Action Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 28, 1978, the Commission approved by a vote of 6-0 the orders attached to the General Counsel's memorandum, dated August 24, 1978, in furtherance of the investigation in the above-captioned matter.

Attest.

8/28/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 8-24-78, 1:22
Circulated on 48 hour vote basis: 8-25-78, 9:00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
SUBJECT: COMMISSION ORDERS IN RELATION TO
MUR 546 (Dr. J. B. Whiting and
Mr. Dennis Grant)
DATE: AUGUST 28, 1978

The attached orders approved August 28, 1978.
have been signed and sealed this date.

ATTACHMENTS:
2 Orders - named above



August 24, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 546

Please have the attached REquest for orders in
MUR 546 distributed to the Commission on a 48 hour tally
basis.

Thank you.

7804008259
7804008259



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

August 24, 1978

MEMORANDUM

TO: The Commissioners

FROM: William C. Oldaker

SUBJECT: MUR 546 (78)

Attached for the Commission's approval are proposed orders to the respondents, Wyoming Dental Association and the Wyoming Dental Political Action Committee, in furtherance of our investigation in this matter.



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE AN ORDER TO FACILITATE THE
INVESTIGATION OF THE WYOMING DENTAL ASSOCIATION
AND THE WYOMING DENTAL POLITICAL ACTION COMMITTEE:

The Commission hereby authorizes an order to
be issued to Dr. J.B. Whiting, Secretary-Treasurer
of the Wyoming Dental Association.

Address: 345 Garfield
Lander, WY 82520

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7 0 0 0 0 3 5 7
Joan D. Aikens, Chairman

William L. Springer, Commissioner

Robert O. Tiernan, Vice-Chairman

Neil O. Staebler, Commissioner

Thomas E. Harris, Commissioner

Vernon W. Thomson, Commissioner



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

AUTHORIZATION TO ISSUE AN ORDER TO FACILITATE THE
INVESTIGATION OF THE WYOMING DENTAL ASSOCIATION
AND THE WYOMING DENTAL POLITICAL ACTION COMMITTEE:

The Commission hereby authorizes an order to be issued to Mr. Dennis Grant, Counsel for Wyoming Dental Political Action Committee.

Address: P.O. Box 1025
Cheyenne, WY 82001

Joan D. Aikens, Chairman

William L. Springer, Commissioner

Robert O. Tiernan, Vice-Chairman

Neil O. Staebler, Commissioner

Thomas E. Harris, Commissioner

Vernon W. Thomson, Commissioner



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. J.B. Whiting, Secretary-Treasurer
Wyoming Dental Association
345 Garfield
Lander, WY 82520

Re: MUR 546 (78)

Dear Dr. Whiting:

This is to acknowledge receipt of your August 9, 1978 letter responding to the Commission's reason to believe determination letter.

After reviewing your response, we feel further clarification of the specific \$1,000 transfer on September 2, 1977 from your association to the Wyoming Dental Political Action Committee is necessary. Enclosed is an order issued by the Federal Election Commission requiring you to answer questions in connection with this matter. Your responses are required to be submitted within ten days after receipt of this letter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Wyoming Dental Political Action
Committee
c/o Mr. Dennis Grant
P.O. Box 1025
Cheyenne, WY 82001

Re: MUR 546 (78)

Dear Mr. Grant:

Enclosed is an order issued by the Federal Election Commission requiring your client, Wyoming Dental Political Action Committee, to answer questions in connection with MUR 546. Your responses are required to be submitted within ten days of your receipt of this letter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure



Wyoming Dental Association

69007
4477

President

Dr. O.C. Kildebeck
211 E. 20th Ave.
Torrington, WY 82240

7:25 PM AM 9:40

President Elect

Dr. Scott M. Welch
84 Park Ave.
Lovell, WY 82431

August 9, 1978

531

Vice-President

Dr. Roy N. Peach
211 W. 9th St.
Casper WY 82601

Judy Thedford
Federal Election Commission
1325 K St. N.W.
Washington D.C. 20462

Secretary-Treasurer

Dr. J.B. Whiting
345 Garfield
Lander, WY 82520

Re: MUR 546 (78)

Executive Secretary

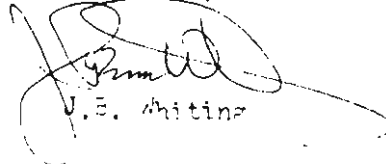
Audrey J. Dugger
40 Ave. G.
Powell, WY 82435

Dear Madam:

Enclosed find information in my possession concerning our WYO-DFAC. Originally, (I think) prior to 1971, our political education fund was kept in a separate account, 4432, to be used for the PAC. When the new law mandated that we transfer all control of those funds over to WYO-DFAC we were advised by Beaman and Paleotes to transfer only \$1000.00 a year (see enclosed letter). At present Account 4432 has \$222.52 left in it and we had planned to transfer that amount and close that account in 1979. Dr. Esmy in Cheyenne now has WYO-DFAC funds plus others I suppose -- I'm not sure what he does with them.

I have served in my position a year now. Dr. Cordelia Hoffmann preceded me in office and I've followed her precedence. If you wish additional information please contact me.

Sincerely,


J.B. Whiting

JOHN C. ESMAY
DOCTOR OF DENTAL SURGERY

3003 Central Avenue

Cheyenne, Wyoming 82001

January 28, 1975

MEMO

TO: WYOMING STATE DENTAL ASSOCIATION

FROM: LEGISLATIVE COMMITTEE

Persuant to the directive of the Wyoming State Dental Association, the Legislative Committee has formed Wyoming Dental Political Action Committee (WYO-DPAC).

The Law Firm of Beaman and Galeotos has completed the necessary registrations with the U.S. Senate and House of Representatives, and will complete all necessary reports as they become due to both National and State jurisdictions.

It will be necessary for the District Secretaries to furnish us with the names of contributors and amount of contributions to both WYO-DPAC and to ADPAC. We need this information by February 20, 1975, in order to complete our reports in the required time. All monies collected for political education for 1975 should be forwarded to Dr. Paul Fanning, 1200 East 19th Street, Cheyenne, Wyoming 82001. These funds will be kept on deposit in American National Bank of Cheyenne.

In the future, statements sent out by the Districts to their members, soliciting political funds, must contain the following statement: "A copy of our report filed with the appropriate supervising office is available for purchase from the Superintendent of Documents, United States Government Printing Office, Washington, D.C. 20540."

Enclosed are copies of our registrations.

Respectfully submitted,

J.C. Esmay, DDS
Chairman
Legislative Committee

JCE/fe
Enclosures

Dr. Frank T. Manning, President
Medical Arts Building
Thermopolis, Wyoming 82443

June 23, 1975

John Emsay, D.D.S.
3003 Central Avenue
Cheyenne,
Wyoming 82001

Dear John,

As you are aware the membership of the Wyoming Dental Association voted to transfer the money from our political education fund to WIO-EPAC. There seemed to be a good deal of confusion as to the legality of doing this as well as how these funds would be used. As I told you on the phone, I personally feel that all needs to be done is to write the check.

However, I think we should satisfy all the membership on these matters. Would you have Bill Eaman send me a letter regarding the transfer of this money? Have him explain in the letter how the money originally was collected, how it can be used after it is transferred and the sort of control the contributing members will have over its use.

I think resolutions that call for transfer of funds or matters that require a legal opinion should be checked quite closely by the officers of the association before they proceed to carry them out. I know you agree, and I appreciate your help.

Sincerely,

Frank T. Manning, D.D.S.

FTM:io

CC: Cordelia Hoffman, D.D.S.
George Ewan, D.D.S.
Orval Kildebeck, D.D.S.
Mrs. Wilma Hoffman

BEAMAN & GALEOTOS

Attorneys and Counsellors at Law

220 WEST 24TH STREET

POST OFFICE BOX 100

CHEYENNE, WYOMING 82001

TELEPHONE 307/637-6020

July 22, 1975

WILLIAM C. BEAMAN
PAUL S. GALEOTOS

Dr. Frank T. Manning, D.D.S.
President, Wyoming Dental Association
Medical Arts Building
Thermopolis, Wyoming 82443

Re: WYO-DPAC

Dear Doctor Manning:

I am in receipt of a copy of your letter addressed to John Esmay, dated June 23, 1975, requesting that I answer and explain certain questions.

The first question I want to deal with concerns the transfer of money from the political education fund to WYO-DPAC. Pursuant to 2 U.S.C. Section 431 (d) (e) and (f), as amended, of the Federal Election Campaign Act, any transfer of funds to WYO-DPAC from the political education fund in excess of \$1,000.00 would be treated as a contribution or expenditure from a "political committee" and in violation of the law, unless the transferor (the Wyoming Dental Association in this case) is a registered political committee, e.g. WYO-DPAC. Consequently, if the amount in the political education fund is in excess of \$1,000.00, you should transfer only \$1,000.00 to WYO-DPAC.

With regard to your question asking how the money was originally collected, I understand that a request for a voluntary contribution from every member of the Wyoming Dental Association in the amount of \$10.00 was included on the statement for dues and that such contributions were transferred to the political education fund. It should be pointed out that once this money finds its way into WYO-DPAC, it can be expended for the purpose of influencing the nomination for election, or the election, of any person seeking Federal office, or the office of President and Vice-President, or it can be used for the purpose of influencing the results of a primary election held for the selection of delegates to a national nominating convention of a political party or for the expressions of a preference for the nomination of persons for election to the office of President of the United States. (See 2 U.S.C. Section 431(e) and (f), as amended). Also under Federal law a political committee may transfer funds to another political committee. Federal law forbids, however, contributing to any candidate with respect to any election for Federal office.

Dr. Manning
Page 2
July 22, 1975

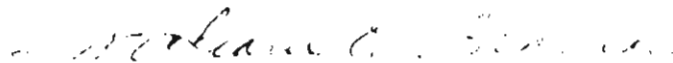
which, in the aggregate, exceed \$5,000.00 2 U.S.C. Section 431, as amended.

As you are probably aware, the "Frisby Amendment" has been amended this past session of the Wyoming Legislature. This new amendment only permits "natural persons" to make contributions in order to aid, promote or prevent the nomination or election of any candidate or to aid or promote the intents, successes or defeat of any political party. [See Chapter 185, Session Laws of Wyoming, 1975, Section 22.1-389(d).] However, this provision does not forbid political parties from receiving contributions from sources other than "natural persons", such as political action committees. I double-checked this exception with John R. Smyth, D. Laramie County, Wyoming House of Representatives, who was actively involved with this Bill, and he stated that a political action committee could contribute funds to a political party and not violate State law.

Finally, with regard to the question of the control contributing members have or, the use of the money, it appears that neither the State or Federal Government has made provisions regarding such control. The Federal law does prescribe that no expenditure is to be made for or on behalf of a political committee without the authorization of the committee's chairman or treasurer or their designated agents. 2 U.S.C., Section 432(a).

I sincerely hope this letter has cleared up many of your questions; and if it has not, or if you have other questions, please feel free to call upon me and I will do my best to answer them.

Sincerely yours,



William C. Beaman

WCB:be

cc: Dr. H. Paul Fanning
Dr. J.C. Esmay
Dr. Joseph Devine



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS

DATE :

JULY 31, 1978

SUBJECT:

MUR 546 - Interim Report, dated
July 26, 1978

Received by the Office of
the Commission Secretary.
7-28-78, 11:40

The above-named document was circulated on a 24 hour no-objection basis at 3:00 p.m. on July 28, 1978.

The Commission Secretary's Office has received no objections to the Interim Report as of 4:00 p.m. this date.

Commissioners Harris, Springer, Staebler, Thomson, and Tiernan returned their papers by the deadline.

July 28, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 546

Please have the attached Interim Report on MUR 546 distributed to the Commission.

Thank you.

78040082607
78040082607

In the Matter of)
)
Wyoming Dental Association)
Wyoming Dental Political) MUR 546 (78)
Action Committee)

Dr. Brown, treasurer of the Wyoming Dental PAC, and Mr. Donald of the American Dental Political Action Committee contacted the Commission in response to the reason to believe notification letters sent to the respondents. On July 12, 1978, Dr. Brown stated that he was going to retain counsel, and Mr. Donald stated that he was going to get in touch with the Wyoming branch.

The respondents failed to submit any further information; therefore, on July 25, 1978, the Office of the General Counsel attempted to contact Dr. Brown and Mr. Donald. Attempts to contact Dr. Brown were unsuccessful, Mr. Donald responded that he was no longer involved in the matter, and that Wyoming attorneys were handling it.

Mr. Donald contacted the Commission later in the day. He stated that the response from the dental PAC had been delayed due to the celebration of "Frontier Days" in Wyoming. He restated that Dr. Brown's attorney was handling the matter and that he had advised him to get in touch with the Commission. We expect to be in touch with the Wyoming Dental PAC early next week.

A letter has been drafted to the Wyoming Dental Association to inform them of their delinquency in responding to our reason to believe notification sent to them June 22, 1978. (A similar letter was sent to the Wyoming Dental PAC July 6, 1978.)

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 28, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Dennis Grant
P.O. Box 1025
Cheyenne, Wyoming 82001

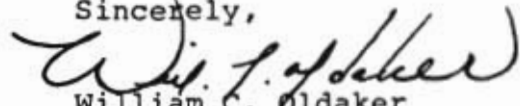
RE: MUR 546 (78)

Dear Mr. Grant:

Pursuant to your telephone conversation with this office on July 26, 1978, we are enclosing copies of notification letters previously sent to Dr. Brown, treasurer of the Wyoming Dental Political Action Committee, in connection with this matter.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

Sincerely,


William C. Oldaker
General Counsel

Enclosures

Shirpad MUX 546

PS Form 3811, Apr. 1977

● **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

☒ 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
Mr. Dennis Grant
PO Box 1095
Cheyenne, WY 82001

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>193920</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Addressee ☐ Authorized agent

[Signature]

4. DATE OF DELIVERY
 AUG 2 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
[Initials]

POSTMARK
 AUG 2 1978



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

April 20, 1978

Dr. Robert C. Brown, D.D.S., Treasurer
Wyoming Dental Political Action Committee
1200 E 19th Street
Cheyenne, Wyoming 82001

Dear Dr. Brown:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the October 10 Quarterly Report of Receipts and Expenditures, we noticed an entry indicating that you may have accepted a contribution from a corporation or a union, which is prohibited by the Act, unless a segregated account has been established by the corporation or union. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted a prohibited contribution that you return the full amount to the donor. This return should be reported immediately by letter and should be reflected as an expenditure on your next report of receipts and expenditures. If you find your identification of the source of this contribution is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Lynne Asquith (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

A handwritten signature in cursive script, reading "Orlando B. Potter".

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

Part 1 of 3
Contributions, In-Kind Contributions, Loans,
Refunds, and Transfers for 1977
(Numbers 18, 19, 22 and/or 23 of FEC Form 3
(Instructions on back))

Page 3 of 4 (a)
Line Number 20 (a)
(Use separate schedule for each numbered line)

Name of Contributor or Committee in full

WYOMING RURAL POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code

WYOMING RURAL ASSOCIATION INC 7-1-15
(Parent organization of Wyoming D-FAC)

Date (month,
day, year)

9/2/77

Amount of each
receipt this period

\$1,000.00

Principal place of business

1303 South Jackson
Casper, Wyoming 82501

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$1,000.00

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date > \$

Sum of all receipts on this page (see instructions)

> \$

Sum of all receipts on this page (see instructions)

> \$1,000.00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 8, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Robert C. Brown, D.D.S.
Sec. Wyoming Dental Political
Action Committee
3003 Central Ave.
Cheyenne, Wyoming 82001

Re: MUR 546 (78)

Dear Dr. Brown:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that the committee's acceptance of \$1,000 from the Wyoming Dental Association on September 2, 1977 may be in violation of 2 U.S.C. §441b which prohibits corporate contributions. A copy of the report is attached for your analysis. We have numbered this matter MUR 546 (78).

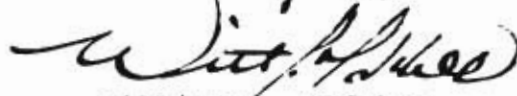
Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) 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 such counsel so notify us in writing.

Sincerely yours,



William C. Oldaker
General Counsel

Enclosure

730400872613
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Revenues, and Transfers for Line
Number 5, 16, 17 and/or 18 of FEC Form 3
(See Instructions on back)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

WYOMING DENTAL POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code

WYOMING DENTAL ASSOCIATION
(Parent organization of Wyoming D-PAC)

Date (month,
day, year)

9/2/77

Amount of ea
receipt this pe

\$1,000.

Principal place of business

1303 South Jackson
Casper, Wyoming 82601

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$1,000.00

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of ea
receipt this per

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of ea
receipt this peri

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this peri

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this peri

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this peri

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional)

\$

Total this period (last page this line number only)

\$1,000.00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Robert C. Brown, D.D.S.
Sec. Wyoming Dental Political
Action Committee
3303 Central Ave.
Cheyenne, WY 82001

Re: MUR 546 (78)

Dear Dr. Brown:

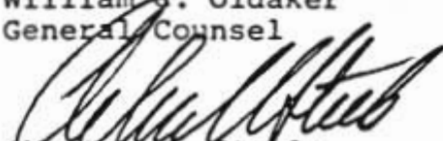
On June 8, 1978, a letter was sent to you from the Commission notifying you that it was conducting an investigation of an alleged violation of the Federal Election Campaign Act of 1971, as amended, by the Wyoming Dental Political Action Committee. You were also notified that you had a reasonable opportunity to demonstrate why no action should be taken against your committee.

As of this date, we have received no response expressing your view of the alleged violation. The Commission intends to conclude its investigation shortly. In the absence of any materials from you, the Commission will have to decide whether to take further action solely on the basis of information available from other sources.

If you have any questions regarding this matter, please call Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

William S. Oldaker
General Counsel


Charles N. Steele
Associate General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 28, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Wyoming Dental Association
c/o Audrey J. Dugger
640 Avenue G
Powell, Wyoming 82435

RE: MUR 546 (78)

Dear Madam or Sir:

On June 22, 1978, a notification was sent to you stating that the Commission was conducting an investigation of an alleged violation of the Federal Election Campaign Act of 1971, as amended, by your association. You were also notified that you had a reasonable opportunity to demonstrate why no action should be taken against you.

As of this date, we have received no response expressing your view of the alleged violation. The Commission intends to conclude its investigation shortly. In absence of any materials from you, the Commission will have to decide whether to take further action solely on the basis of information available from other sources.

If you have any questions regarding this matter, please call Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

William C. Oldaker
William C. Oldaker
General Counsel

619686610007

PS Form 3811, Apr. 1977 RETURN RECEIPT REGISTERED INSURED AND CERTIFIED MAIL

Thailand MUR Sub

● 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 C
☒ Show to whom, date, and address of delivery C
☐ RESTRICTED DELIVERY C
Show to whom and date delivered C
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$
CONSULT POSTMASTER FOR FEES!

2 ARTICLE ADDRESSED TO
101 Edinboro
Edinboro, Pa. 16710
68401106-82435

3 ARTICLE DESCRIPTION
REGISTERED NO CERTIFIED NO INSURED NO
943915

(Always obtain signature of addressee or agent)

I have received the article described above
SIGNATURE ☐ Addressee ☐ Authorized agent
4 Audrey Duggan
DATE OF DELIVERY 8-3-77 POSTMARK

5 ADDRESS: Complete only if requested
68401106-82435

6 UNABLE TO DELIVER BECAUSE
CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 7, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *mwe*

SUBJECT: MUR 546 (78) - Interim Report dated 6-28-78
Signed 7-5-78
Received in Office of Commission
Secretary 7-5-78, 2:28

The above-mentioned document was circulated on a 24
hour no-objection basis at 9:00 a.m., July 6, 1978.

As of 9:00 a.m., this date, no objections have been
received in the Office of Commission Secretary to the Interim
Report.

July 5, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 546

Please have the attached Interim Report distributed
to the Commission.

Thank you.

78040082621
78040082621

BEFORE THE FEDERAL ELECTION COMMISSION
June 28, 1978

In the Matter of)
Wyoming Dental Association) MUR 546 (78)
Wyoming Dental Political Action)
Committee)

INTERIM REPORT

On June 8, 1978, letters were sent to the respondents notifying them that the Commission had found reason to believe that they may have committed a violation of 2 U.S.C. §441b. The notification letter to the Wyoming Dental Association was returned and resent, June 23, 1978, with a new address. To date, no response has been received from the Wyoming Dental Political Action Committee in reply to their notification letter. A letter has been sent to the respondent notifying him of his failure to respond.

5 July 1978
DATE


WILLIAM C. OLDAKER
GENERAL COUNSEL



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

July 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Robert C. Brown, D.D.S.
Sec. Wyoming Dental Political
Action Committee
3303 Central Ave.
Cheyenne, WY 82001

Re: MUR 546 (78)

Dear Dr. Brown:

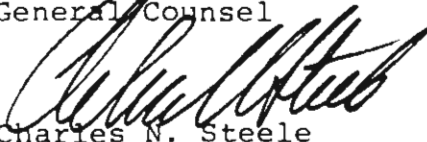
On June 8, 1978, a letter was sent to you from the Commission notifying you that it was conducting an investigation of an alleged violation of the Federal Election Campaign Act of 1971, as amended, by the Wyoming Dental Political Action Committee. You were also notified that you had a reasonable opportunity to demonstrate why no action should be taken against your committee.

As of this date, we have received no response expressing your view of the alleged violation. The Commission intends to conclude its investigation shortly. In the absence of any materials from you, the Commission will have to decide whether to take further action solely on the basis of information available from other sources.

If you have any questions regarding this matter, please call Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

William G. Oldaker
General Counsel


Charles N. Steele
Associate General Counsel

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. 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:
Dr. Robert Brown, DDS
Catching Centre PACE
3303 Central Ave
Channah, NY 83001

3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943535	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY *Nile Essay*

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

☆ GPO : 1977-O-234-337



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

June 8, 1978

MEMORANDUM

TO: THE OFFICE OF GENERAL COUNSEL
Attention: Judy Thedford

THROUGH: ORLANDO B. POTTER *OBP*

FROM: TOM HASELHORST *TH*

SUBJECT: WYOMING DENTAL POLITICAL ACTION COMMITTEE
MUR 546

On April 20, 1978, RAD initiated a surface violation letter for acceptance of apparent corporate contributions by a political action committee. The committee submitted a response which was received by the Commission on June 5, 1978 which appears to be inadequate.

Pursuant to our procedures for placing documents on the Public Record, we have included this letter in the committee's public file.

A copy of this letter has been made available to Judy Thedford, and an additional copy is attached for your convenience.

If we can be of further assistance to your office, please do not hesitate to contact Peggy Sims at extension 34048.



'78 JUN 5 PM 12:55

Orlando B. Potter
Staff Director
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

Subject: 2sV1/78-25

I do not feel that the Wyoming Dental Political Action Committee is in violation of the Federal Election Campaign Act. We are a committee of the Wyoming Dental Association. Each contribution to the Political Action Fund is given on a voluntary basis by each of the members. The Wyoming Dental Association is not a union. The item in question refers to a transfer of funds into the committee, which is composed only of members of the Association.

Since I am not an attorney, nor a specialist in these matters I am not sure what other information you may require.

Please try to be as specific as possible and your questions will be answered to the best of our ability.

The delay in answering correspondence from the commission is due mostly to an incorrect address on our mail. The proper address is as follows:

Robert C. Brown D.D.S.
Sec. Wyoming Dental Political Action
Committee
3003 Central Ave.
Cheyenne, Wyoming 82001

Sincerely,

Robert C. Brown D.D.S.

Robert C. Brown D.D.S.

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

Shepard MUR546

● 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
☒ 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:
 Wyoming Dental Assoc
 1000 Broadway
 640 Bozeman
 Powell, Wyoming 82435

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 963389

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE ☐ Addressee ☐ Authorized agent
 Shirley J. [Signature]

4. DATE OF DELIVERY
 JUN 28 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
 JUN 28 1978
 C

REGISTERED
 INSURED
 CERTIFIED



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

June 8, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Robert C. Brown, D.D.S.
Sec. Wyoming Dental Political
Action Committee
3003 Central Ave.
Cheyenne, Wyoming 82001

Re: MUR 546 (78)

Dear Dr. Brown:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended, ("the Act"). Specifically, it appears that the committee's acceptance of \$1,000 from the Wyoming Dental Association on September 2, 1977 may be in violation of 2 U.S.C. §441b which prohibits corporate contributions. A copy of the report is attached for your analysis. We have numbered this matter MUR 546 (78).

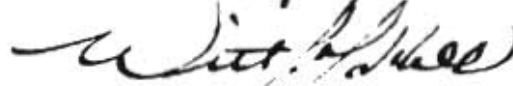
Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) 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 such counsel so notify us in writing.

Sincerely yours,



William C. Oldaker
General Counsel

Enclosure

Shepard MUR546

PS Form 3811, Apr. 1977

● 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.
☒ 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:
*Dr. Robert C. Brown MD
The Wyoming Dental Soc
3003 Central Ave
Cheyenne WY 82001*

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943021

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Donald J. Sacks

4. DATE OF DELIVERY *6-13-78* POSTMARK

5. ADDRESS (Complete only if requested)
*3003 Central Ave
Cheyenne WY 82001*

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

Contributions, Ticket Purchases, Loans, Advances, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See instructions on back)

Page _____ of _____ for
LINE NUMBER 18(a)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

WYOMING DENTAL POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code WYOMING DENTAL ASSOCIATION (Parent organization of Wyoming D-PAC)		Date (month, day, year) 9/2/77	Amount of each receipt this period \$1,000.00
Principal place of business 1303 South Jackson Casper, Wyoming 82601	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$1,000.00		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)		▶	\$
Total this period (last page this line number only)		▶	\$1,000.00

FEDERAL ELECTION COMMISSION

133 K STREET N.W.
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



Treasurer
Wyoming Dental Association
1303 South Jackson
Casper, Wyoming 82601



943018

10782631

7 3 3 1 1 3 3 6 5 2

✓
546-04 Bedford

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)
☐ Show to whom and date delivered c
☒ Show to whom, date, and address of delivery c
☐ RESTRICTED DELIVERY
Show to whom and date delivered c
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery S
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Treasurer, Wyoming Dental Association, 1303 South Jackson, Casper, Wyoming 82401

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
4430M

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS





FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

June 8, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Wyoming Dental Association
1301 South Jackson
Casper, Wyoming 82601

Re: MUR 546 (78)

Dear Madam or Sir:

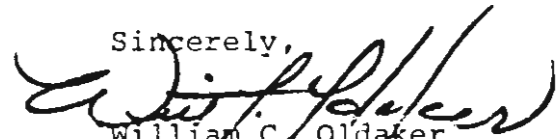
Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your association may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your transfer of \$1000 to the Wyoming Dental Political Action Committee on September 2, 1977 may be in violation of 2 U.S.C. §441b which prohibits corporations from contributing to political committees. A copy of the report is attached for your review. We have numbered this matter MUR 546.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) 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 such counsel so notify us in writing.

Sincerely,


William C. Oldaker
General Counsel

Enclosure



**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 3 of 4 for
LINE NUMBER 18(a)

(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

WYOMING DENTAL POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code

**WYOMING DENTAL ASSOCIATION
(Parent organization of Wyoming D-PAC)**

Date (month,
day, year)

9/2/77

Amount of each
receipt this period

\$1,000.00

Principal place of business

**1303 South Jackson
Casper, Wyoming 82601**

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ **\$1,000.00**

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional)

▶ \$

Total this period (last page this line number only)

▶ **\$1,000.00**



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Wyoming Dental Association
1301 South Jackson
Casper, Wyoming 82601

Re: MUR 546 (78)

Dear Madam or Sir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your association may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your transfer of \$1000 to the Wyoming Dental Political Action Committee on September 2, 1977 may be in violation of 2 U.S.C. §441b which prohibits corporations from contributing to political committees. A copy of the report is attached for your review. We have numbered this matter MUR 546.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) 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 such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure



Handwritten signature/initials

June 2, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 546

Please have the attached revised 7 day report on
MUR 546 distributed to the Commission on a 48 hour tally
basis.

Thank you.

7 8 0 4 0 0 8 2 6 3 6
~~7 8 0 4 0 0 8 2 6 3 6~~
~~7 8 0 4 0 0 8 2 6 3 6~~

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter)
Wyoming Dental Political) MUR 546 (78)
Action Committee)
Wyoming Dental Association)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 7, 1978, the Commission approved by a vote of 5-0 the recommendations in the First General Counsel's Report dated June 2, 1978 to take the following actions in the above-captioned matter:

1. Find reason to believe that the Wyoming Dental Political Action Committee and Wyoming Dental Association may have violated 2 U.S.C. §441b.
2. Send the letters attached to the report.

Commissioners Aikens, Tiernan, Thomson, Harris and Staebler returned their votes by the deadline.

Date:

June 7, 1978

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in the Office of Commission Secretary:
Circulated on a 48 hour vote basis:

6-2-78, 1:23
6-5-78, 10:30

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL JUN 2 1978
BY OGC TO COMMISSION _____

MUR NO. 546 (78)
STAFF MEMBER(S) THEDFORD

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Wyoming Dental Political Action Committee
Wyoming Dental Association

RELEVANT STATUTE: 2 U.S.C. §441b

INTERNAL REPORTS CHECKED: Wyoming Dental PAC

FEDERAL AGENCIES CHECKED: N/A

GENERATION OF MATTER

This matter was initiated through the alphabetical review of non-party reports normally conducted by the Reports Analysis Division, Non-Party Team. The matter was referred to the Office of the General Counsel after the Reports Analysis review indicated a violation of 2 U.S.C. §441b.

PRELIMINARY LEGAL ANALYSIS

Wyoming Dental Political Action Committee reported a transfer of \$1,000 from its parent organization, the Wyoming Dental Association. The Wyoming Secretary of State's Office was contacted and informed the Office of the General Counsel that the Wyoming Dental Association was incorporated. This transfer, therefore, appears to be in violation of 2 U.S.C. §441b which prohibits a corporation from contributing to a political committee.

On April 20, 1978, the Reports Analysis Division sent a surface violation letter to Wyoming Dental PAC citing the \$1,000 transfer

from the Wyoming Dental Association as a possible violation of 2 U.S.C. §441b. The Commission has not received a response from Wyoming Dental PAC in reply to the surface violation letter.

RECOMMENDATION

- 1) Find reason to believe that Wyoming Dental Political Action Committee and Wyoming Dental Association may have violated 2 U.S.C. §441b.

- 2) Send the attached letters.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Robert C. Brown, D.D.S.
Treasurer
Wyoming Dental Political Action
Committee
1200 E. 19th Street
Cheyenne, Wyoming 82001

Re: MUR 546 (78)

Dear Dr. Brown:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that the committee's acceptance of \$1,000 from Wyoming Dental Association on September 2, 1977 may be in violation of 2 U.S.C. §441b which prohibits corporate contributions. A copy of the report is attached for your analysis. We have numbered this matter MUR 546 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. §437g(a)(3)(B) 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 such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Wyoming Dental Association
1301 South Jackson
Casper, Wyoming 82601

Re: MUR 546 (78)

Dear Madam or Sir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your association may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your transfer of \$1000 to the Wyoming Dental Political Action Committee on September 2, 1977 may be in violation of 2 U.S.C. §441b which prohibits corporations from contributing to political committees. A copy of the report is attached for your review. We have numbered this matter MUR 546.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) 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 such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure





FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

April 20, 1978

Dr. Robert C. Brown, D.D.S., Treasurer
Wyoming Dental Political Action Committee
1200 E 19th Street
Cheyenne, Wyoming 82001

Dear Dr. Brown:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the October 10 Quarterly Report of Receipts and Expenditures, we noticed an entry indicating that you may have accepted a contribution from a corporation or a union, which is prohibited by the Act, unless a segregated account has been established by the corporation or union. A copy of that portion of your report is attached for your review and clarification.

The Commission recommends that if you have accepted a prohibited contribution that you return the full amount to the donor. This return should be reported immediately by letter and should be reflected as an expenditure on your next report of receipts and expenditures. If you find your identification of the source of this contribution is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

Please notify the Commission within ten (10) days of receipt of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Lynne Asquith (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is 523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Enclosure
Certified Mail:
Return Receipt Requested

Y 1ST NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
 2ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
 3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. Wyoming Dental Association

(full name of committee making the contribution)

1303 South Jackson

(address)

Casper, Wyoming 82601

(city, state, zip)

(treasurer, if given)

TYPE OF REPORT: _____

FILED WITH: _____

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: _____

SECTION IN VIOLATION: _____

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: _____

CODED BY: _____

DATE: _____

SV# _____

APPENDIX XII

APPENDIX XII(R)

APPENDIX XII(HR)

2. Wyoming Dental Political Action Committee

(full name of committee receiving the contribution)

1300 E. 10th St.

(address)

Cheyenne, WY. 82001

(city, state, zip)

Dr. Robert C. Brown, D.D.S.

(treasurer, if given)

TYPE OF REPORT: Political Quarterly

FILED WITH: _____

F.E.C.

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: Laura Argueta

SECTION IN VIOLATION: gailb.

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A(2)

CODED BY: James R. Brown

DATE: 3-28-78

SV# 2501/25 25

APPENDIX XII

APPENDIX XII(R)

APPENDIX XII(HR)

(Use parentheses for all the each numbered line)

UNITED STATES GOVERNMENT PRINTING OFFICE: 1964 O 561-101

$$f(x) = \frac{1}{2} \left(1 + \frac{x}{\sqrt{1+x^2}} \right) \quad \text{for } x \in \mathbb{R}.$$

1. *Chlorophyll a* and *b* contents were determined by the method of Arar and Cook (1987).

C. Time Optimization of Forward P-Tree

INC 7-1-15

12-11-1984

Assume that $c^* \in \mathcal{C}^*$ is the optimal solution to the problem

2/3/77

\$1,020.00

1. 12 in. (30 cm) x 12 in. (30 cm) x 12 in. (30 cm)

¹ Amongst eight children.

$$f(x) = \frac{1}{2} \ln \frac{1+x}{1-x}$$

Received 10 May 2006
 Accepted 12 July 2006
 Available online 18 July 2006

$$\left\{ \begin{array}{l} \dot{V}_1 = -V_1 \\ \dot{V}_2 = -V_2 \\ \dot{V}_3 = -V_3 \end{array} \right.$$

1. *Longue et vive*
 2. *Longue et vive*

$\mathbb{E}[\mathbf{y}|\mathbf{x}] = \mathbf{A}\mathbf{x} + \mathbf{b}$
 $\mathbf{y} = \mathbf{A}\mathbf{x} + \mathbf{b} + \mathbf{e}$
 $\mathbf{e} = \mathbf{y} - \mathbf{A}\mathbf{x} - \mathbf{b}$

[illegible]
$$1.4 \times 10^5$$
$$f(x) = \frac{1}{2} \left(1 + \frac{x}{\sqrt{1+x^2}} \right)$$



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER
TOM HASSELHORST *TH*

FROM: STEVE MIMS *SM*

RE: WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL EDUCATION
(JULY 10 QUARTERLY)
WYOMING DENTAL POLITICAL ACTION COMMITTEE
(OCTOBER 10 QUARTERLY) *MUR 5410*
NORTH TEXAS POLITICAL ACTION COMMITTEE
(YEAR END 1977)

A review of the Reports of Receipts and Expenditures filed by the above captioned committees shows four instances of receipts from union and/or corporate funds other than separate segregated political funds. In keeping with the Commission's decision of November 17, 1977 these apparent violations are referred to your office for immediate consideration.

Should you have any questions in this regard please let me know.

229
*Tom - In view of Bill A.
memo of 2/22, I am
returning this, since
it appears to cover the
type of cases on which
February 23, 1978
OFC would like to go
to take further action.*

*OBP.
2/27.*



☒ NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
☒ NOTICE SURFACE VIOLATION (CHECK APPENDIX)
☒ 3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. Steamfitters' Local #601

(full name of committee making the contribution)

4112 West Burleigh Street

(address)

Milwaukee, Wisconsin 53210

(city, state, zip)

Letter Unnecessary

(treasurer, if given)

TYPE OF REPORT: July 10 Quarterly

FILED WITH: FEC

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): N/A

TEAM ANALYST: Beverly Brown

SECTION IN VIOLATION: 434

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A (S)

APPENDIX XII

CODED BY: Beverly Brown

APPENDIX XII(R)

DATE: 12 / 28 / 77

APPENDIX XII(NR)

SV#

2. Wisconsin State AFL-CIO Committee on Political Education

(full name of committee receiving the contribution)

6333 West Bluemound Road

(address)

Milwaukee, Wisconsin 53213

(city, state, zip)

Jack B. Reihl

(treasurer, if given)

TYPE OF REPORT: July 10 Quarterly

FILED WITH: FEC

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): N/A

TEAM ANALYST: Beverly Brown

SECTION IN VIOLATION: 434

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A (S) - Union

☒ APPENDIX XII

CODED BY: Beverly Brown

☒ APPENDIX XII(R)

DATE: 12/28/77

☒ APPENDIX XII(NR)

SV# 2SV1 - 77-88

Contributions, Ticket Purchases, Loans,
 Rates, and Transfers for Line
 Numbers 15, 16, 17 and/or 18 of FEC Form 3
 (see instructions on back)

LINE NUMBER 15A

(Use separate schedule(s) for each
 numbered line)

Name of Candidate or Committee in full

Wisconsin State AFL-CIO Committee on Political Education

Full Name, mailing address and ZIP code

Steamfitters' Local #601
 4112 West Burleigh Street
 Milwaukee, Wisconsin 53210

Date (month,
day, year)

4/20/77

Amount of
receipt this period

500.

Principal place of business

Occupation

Same

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional)

▶ \$

Total this period (last page this line number only)

▶ \$

500.

☒ 1ST NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
☒ 2ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
☐ 3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. _____
(full name of committee making the contribution)

(address)

(city, state, zip)

(treasurer, if given)

TYPE OF REPORT: _____ FILED WITH: _____

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: _____ SECTION IN VIOLATION: _____

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: _____

APPENDIX XII

CODED BY: _____

APPENDIX XII(R)

DATE: _____

APPENDIX XII(NR)

SV# 2SV1 / 78-01

2. Wyoming Dental Political Action Committee
(full name of committee receiving the contribution)

1200 E. 19th Street
(address)

Cheyenne, Wyoming 82001
(city, state, zip)

H. Paul Fanning
(treasurer, if given)

TYPE OF REPORT: October 10 Quarterly FILED WITH: Federal Election Commission

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: Marybeth Tarrant SECTION IN VIOLATION: _____

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A (S) - UNION

CODED BY: Marybeth Tarrant

☒ APPENDIX XII

DATE: January 3, 1978

☒ APPENDIX XII(R)

SV# 2SV1 / 78-01

☒ APPENDIX XII(NR)

**Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 3 of 4 for
LINE NUMBER 18(a)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

WYOMING DENTAL POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
WYOMING DENTAL ASSOCIATION (Parent organization of Wyoming D-PAC)		9/2/77	\$1,000.00
Principal place of business	Occupation		
1303 South Jackson Casper, Wyoming 82601	☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$1,000.00		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business			
Occupation			
☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business			
Occupation			
☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business			
Occupation			
☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business			
Occupation			
☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business			
Occupation			
☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business			
Occupation			
☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$			
Subtotal of receipts this page (optional)			\$
Total this period (last page this line number only)			\$1,000.00

☒ 1ST NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
☐ 2ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
☐ 3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. _____
 (full name of committee making the contribution)

 (address)

 (city, state, zip)

 (treasurer, if given)

TYPE OF REPORT: _____ FILED WITH: _____
 DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____
 TEAM ANALYST: _____ SECTION IN VIOLATION: _____
 ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW
 LETTER CODE: _____
 CODED BY: _____
 DATE: _____
 SV# _____

2. North Texas Political Action Committee
 (full name of committee receiving the contribution)
200 City National Building
 (address)
Wichita Falls, TX 76301
 (city, state, zip)
Jerry F. Mathis
 (treasurer, if given)

TYPE OF REPORT: Year End 77 FILED WITH: Federal Election Commission
 DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____
 TEAM ANALYST: Ron Ewalt SECTION IN VIOLATION: 4418b
 ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW
 LETTER CODE: A(p)
 CODED BY: RIF
 DATE: 2/8/77
 SV# 2502-781

☒ APPENDIX XII
☒ APPENDIX XII(R)
☒ APPENDIX XII(NR)

720 1-10-77 3 6 5 1

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**

Page 6 of 6 for

LINE NUMBER 15a

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

North Texas Political Action Committee

Full Name, mailing address and ZIP code

Expando Production Co.
607 Hamilton Bldg.
Wichita Falls, TX 76301

Date (month,
day, year)

12/6/77

Amount of each
receipt this period

500.00

Principal place of business

Expando Production Co.

Occupation

Oil & Gas Producers

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 500.00

Full Name, mailing address and ZIP code

Jack Grace Production Co.
821 Petroleum Bldg.
Wichita Falls, TX 76301

Date (month,
day, year)

11/20/77

Amount of each
receipt this period

500.00

Principal place of business

Jack Grace Production Co.

Occupation

Oil & Gas Producers

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 500.00

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$

Subtotal of receipts this page (optional)

\$ 1,000.00

Total this period (last page this line number only)

\$ 14,650.00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

May 3, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *mwe*

SUBJECT: MURs 545 and 546 (78) - Memorandum dated 5-1-78
Received in Office of
Commission Secretary:
5-2-78, 1:54

The above-mentioned document was circulated on a
24 hour no-objection basis as 4:00 p.m., May 1, 1978.

As of 4:00 p.m., this date, no objections have been
received in the Office of Commission Secretary to the
Memorandum.

78040082653

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Wyoming Dental Political)
Action Committee)
Wyoming Dental Association)

MUR 546 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 24, 1978, the Commission approved without objection the recommendations in the First General Counsel's Report dated April 21, 1978 in the above-captioned matter as follows:

1. Find reason to believe that Wyoming Dental Association and Wyoming Dental Political Action Committee may have violated 2 U.S.C. §441b.
2. Send the letters attached to the First General Counsel's Report.

Date: 4-25-78

Marjorie W. Emmons
Marjorie W. Emmons
Secretary to the Commission

Report dated: 4-21-78
Received in Office of Commission Secretary: 4-21-78, 11:59
Circulated on 24 hour no-objection basis: 4-21-78, 3:30



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

APRIL 24, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE EMMONS *mwe*
RE: REPORTS FROM GENERAL COUNSEL ON MURS

At 3:30 p.m. on Friday, April 21, 1978, the Office of the Secretary to the Commission circulated the following MUR reports to the Commissioners on a no-objection basis:

MUR 546

MUR 373

MUR 467

MUR 473

MUR 526

At 4:00 p.m. on Monday, April 24, 1978, we have received no objections to the recommendations in the above-named reports.



April 21, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 546

Please have the attached 7 day report on MUR 546 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

200780400082656
78040080418

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL APR 11 1978
BY OGC TO COMMISSION _____

MUR NO. 546 (78)
STAFF MEMBER(S) THEDFORD

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Wyoming Dental Political Action Committee
Wyoming Dental Association

RELEVANT STATUTE: 2 U.S.C. §441b

INTERNAL REPORTS CHECKED: Wyoming Dental PAC

FEDERAL AGENCIES CHECKED: N/A

GENERATION OF MATTER

This matter was initiated through the alphabetical review of non-party reports normally conducted by the Reports Analysis Division, Non-Party Team. The matter was referred to the Office of the General Counsel after the Reports Analysis review indicated a violation of 2 U.S.C. §441b.

PRELIMINARY LEGAL ANALYSIS

Wyoming Dental Political Action Committee reported a transfer of \$1000 from its parent organization, the Wyoming Dental Association. The Wyoming Secretary of State's Office was contacted and informed the Office of the General Counsel that the Wyoming Dental Association was incorporated. This transfer appears to be in violation of 2 U.S.C. §441b which prohibits a corporation from contributing to a political committee. In keeping with the Commission's March 15, 1978 decision, this matter is being given MUR status with both the dental political action committee and the corporation being made respondents since the \$1000 transfer meets the prescribed threshold of \$100. Therefore, the Wyoming Dental PAC appears to have violated the Act by accepting a corporate contribution and the Wyoming Dental Association appears to have violated the Act by contributing to a political committee.

RECOMMENDATION

- 1) Find reason to believe that Wyoming Dental Association and Wyoming Dental Political Action may have violated 2 U.S.C. §441b.
- 2) Send the attached letters.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Wyoming Dental Association)
and) MUR
Wyoming Dental Political Action)
Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on , 1978, the Commission accepted the recommendations of the General Counsel in reference to the above-captioned matter:

- 1) Find reason to believe that Wyoming Dental Association and Wyoming Dental Political Action Committee may have violated 2 U.S.C. §441b.
- 2) Send the attached letters.



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Treasurer
Wyoming Dental Association
1301 South Jackson
Casper, Wyoming 82601

Re: MUR 546 (78)

Dear Madam or Sir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your association may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your transfer of \$1000 to the Wyoming Dental Political Action Committee on September 2, 1977 may be in violation of 2 U.S.C. §441b which prohibits corporations from contributing to political committees. A copy of the report is attached for your review. We have numbered this matter MUR 546.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202-523-4057.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) 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 such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

Enclosure





FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

H. Paul Fanning, Treasurer
Wyoming Dental Political
Action Committee
1200 E. 19th Street
Cheyenne, Wyoming 82001

Re: MUR 546 (78)

Dear Mr. Fanning:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that the committee's acceptance of \$1000 from Wyoming Dental Association on September 2, 1977 may be in violation of 2 U.S.C. §441b which prohibits corporate contributions. A copy of the report is attached for your analysis. We have numbered this matter MUR 546 (78).

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. 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.

If you have any questions, please contact Judy Thedford, the staff member assigned to this matter, at 202/523-4057.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a) (3) (B) unless you notify the Commission in writing that you wish the investigation to be made public.



- 2 -

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

~~780 400 82661~~

D-29
000



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

*Tom - In view of Bill's
memo of 2/22, I am
returning this, since
it appears to cover the
type of cases on which
February 23, 1978
OFC would like to agree
to take further action -*

*OBP.
2/27.*

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER
TOM HASELHORST *TH*

FROM: STEVE MIMS *SM*

RE: WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL EDUCATION
(JULY 10 QUARTERLY)
WYOMING DENTAL POLITICAL ACTION COMMITTEE
(OCTOBER 10 QUARTERLY) *MUR 546*
NORTH TEXAS POLITICAL ACTION COMMITTEE
(YEAR END 1977)

A review of the Reports of Receipts and Expenditures filed by the above captioned committees shows four instances of receipts from union and/or corporate funds other than separate segregated political funds. In keeping with the Commission's decision of November 17, 1977 these apparent violations are referred to your office for immediate consideration.

Should you have any questions in this regard please let me know.



**Itemized receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 3 of 4 for

LINE NUMBER 18(a)

(Use separate schedule(s) for each
numbered line)

Commission
F.W.
D.C. 20463

Name of Candidate or Committee in full

WYOMING DENTAL POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
WYOMING DENTAL ASSOCIATION (Parent organization of Wyoming D-PAC)	9/2/77	\$1,000.00
Principal place of business 1303 South Jackson Casper, Wyoming 82601	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$1,000.00	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Full Name, mailing address and ZIP code	Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$	
Subtotal of receipts this page (optional)		\$
Total this period (last page this line number only)		\$1,000.00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

March 6, 1978

MEMORANDUM

TO: Bill Oldaker and Charlie Steele

THROUGH: Hal Ponder

FROM: Judy Thedford

SUBJECT: Referral from the Reports Analysis Division

On February 23, 1978 the Reports Analysis Division referred the names of three federal committees which reported receiving union and/or corporate funds in violation of 2 U.S.C. §441b.

I have checked the Docket's respondent MUR index and the list of referrals from the Reports Analysis Division to, hopefully, assure that these committees were not previously referred to and acted upon by OGC or the Commission.

We suggest that this matter be given MUR status and the committees be questioned through a RTB. The reporting of these contributions as union and/or corporate contributions appears to be sufficient for recommending to the Commission that reason to believe be found.

OK

3/7/78

3/14/78





FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER
TOM HASELHORST *TH*

FROM: STEVE MIMS *SM*

RE: WISCONSIN STATE AFL-CIO COMMITTEE ON POLITICAL EDUCATION
(JULY 10 QUARTERLY)
WYOMING DENTAL POLITICAL ACTION COMMITTEE
(OCTOBER 10 QUARTERLY) *MUR 546*
NORTH TEXAS POLITICAL ACTION COMMITTEE
(YEAR END 1977)

A review of the Reports of Receipts and Expenditures filed by the above captioned committees shows four instances of receipts from union and/or corporate funds other than separate segregated political funds. In keeping with the Commission's decision of November 17, 1977 these apparent violations are referred to your office for immediate consideration.

Should you have any questions in this regard please let me know.

*DM - In view of Bill O's
memo of 2/22, I am
returning this, since
it appears to cover the
type of cases on which
February 23, 1978
OFC would like to agree
to take further action -*

*ORP.
4/27.*



X NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
2ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. Steamfitters' Local #601

(full name of committee making the contribution)

4112 West Burleigh Street

(address)

Milwaukee, Wisconsin 53210

(city, state, zip)

Letter Unnecessary

(treasurer, if given)

TYPE OF REPORT: July 10 Quarterly

FILED WITH: FEC

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): N/A

TEAM ANALYST: Beverly Brown

SECTION IN VIOLATION: 434

ATTACH TWO COPIES OF ENTRIES IN
QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A (S)

CODED BY: Beverly Brown

APPENDIX XII

DATE: 12 / 28 / 77

APPENDIX XII(R)

SV#

APPENDIX XII(NR)

2. Wisconsin State AFL-CIO Committee on Political Education

(full name of committee receiving the contribution)

6333 West Bluemound Road

(address)

Milwaukee, Wisconsin 53213

(city, state, zip)

Jack B. Reihl

(treasurer, if given)

TYPE OF REPORT: July 10 Quarterly

FILED WITH: FEC

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): N/A

TEAM ANALYST: Beverly Brown

SECTION IN VIOLATION: 434

ATTACH TWO COPIES OF ENTRIES IN
QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A (S) - Union

CODED BY: Beverly Brown

DATE: 12/28/77

SV# 2SV1 - 77-88

APPENDIX XII

APPENDIX XII(R)

APPENDIX XII(NR)

Contributions, Ticket Purchases, Loans, Debates, and Transfers for Line Numbers 15, 16, 17 and/or 18 of FEC Form 3

(See instructions on back)

LINE NUMBER 15A

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

Wisconsin State AFL-CIO Committee on Political Education

Full Name, mailing address and ZIP code

 Steamfitters' Local #601
 4112 West Burleigh Street
 Milwaukee, Wisconsin 53210
Date (month,
day, year)

4/20/77

Amount of each
receipt this period

500.00

Principal place of business

Occupation

Same

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional) ▶ \$

Total this period (last page this line number only) ▶ \$ 500.00

(Use separate schedule(s) for . . . numbered line)

Political Education

[illegible]

☒ NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
☐ 2ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
☐ 3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. _____
(full name of committee making the contribution)

(address)

(city, state, zip)

(treasurer, if given)

TYPE OF REPORT: _____

FILED WITH: _____

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: _____

SECTION IN VIOLATION: _____

ATTACH TWO COPIES OF ENTRIES IN
QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: _____

CODED BY: _____

DATE: _____

SV# 2SV1 / 78-01

☒ APPENDIX XII

☒ APPENDIX XII(R)

☒ APPENDIX XII(NR)

Wyoming Dental Political Action Committee

(full name of committee receiving the contribution)

1200 E. 19th Street

(address)

Cheyenne, Wyoming 82001

(city, state, zip)

H. Paul Fanning

(treasurer, if given)

TYPE OF REPORT: October 10 Quarterly FILED WITH: Federal Election Commission

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: Marybeth Tarrant

SECTION IN VIOLATION: _____

ATTACH TWO COPIES OF ENTRIES IN
QUESTION, HIGHLIGHTED IN YELLOW

LETTER CODE: A (S) - UNION

CODED BY: Marybeth Tarrant

DATE: January 3, 1978

SV# 2SV1 / 78-01

☒ APPENDIX XII

☒ APPENDIX XII(R)

☒ APPENDIX XII(NR)

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(see instructions on back)

Page 3 of 4 for

LINE NUMBER 18(a)

(Use separate schedule(s) for each numbered line)

Commission
N.W.
D.C. 20463

Name of Candidate or Committee in full

WYOMING DENTAL POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code WYOMING DENTAL ASSOCIATION (Parent organization of Wyoming D-PAC)		Date (month, day, year) 9/2/77	Amount of each receipt this period \$1,000.00
Principal place of business 1303 South Jackson Casper, Wyoming 82601	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$1,000.00		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)		▶ \$	
Total this period (last page this line number only)		▶ \$1,000.00	

Receipts, Contributions, Ticket Purchases, Loan
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(see instructions on back)

Page 3 of 4 for

LINE NUMBER 18(a)

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

WYOMING DENTAL POLITICAL ACTION COMMITTEE

Full Name, mailing address and ZIP code WYOMING DENTAL ASSOCIATION (Parent organization of Wyoming D-PAC)		Date (month, day, year) 9/2/77	Amount of each receipt this period \$1,000.00
Principal place of business 1303 South Jackson Casper, Wyoming 82601	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$1,000.00		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Principal place of business	Occupation ☐ Check if Contributor is self-employed Aggregate Year-to-date ▶ \$		
Subtotal of receipts this page (optional)		▶ \$	
Total this period (last page this line number only)		▶ \$1,000.00	

☒ 1ST NOTICE SURFACE VIOLATION (CHECK LETTER CODE)
☐ 2ND NOTICE SURFACE VIOLATION (CHECK APPENDIX)
☐ 3RD NOTICE SURFACE VIOLATION (CHECK APPENDIX)

1. _____
 (full name of committee making the contribution)

 (address)

 (city, state, zip)

 (treasurer, if given)

TYPE OF REPORT: _____ FILED WITH: _____

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: _____ SECTION IN VIOLATION: _____

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW LETTER CODE: _____

APPENDIX XII CODED BY: _____

APPENDIX XII(R) DATE: _____

APPENDIX XII(NR) SV# _____

2. North Texas Political Action Committee
 (full name of committee receiving the contribution)

200 City National Building
 (address)

Wichita Falls, TX 76301
 (city, state, zip)

Jerry F. Mathis
 (treasurer, if given)

TYPE OF REPORT: Year End 77 FILED WITH: Federal Election Commission

DATE RESPONSE WAS RECEIVED (IF APPLICABLE): _____

TEAM ANALYST: Ron Ewalt SECTION IN VIOLATION: 4418b

ATTACH TWO COPIES OF ENTRIES IN QUESTION, HIGHLIGHTED IN YELLOW LETTER CODE: A(p)

CODED BY: RJE

DATE: 2/8/77

SV# 2SU2-781

☐ APPENDIX XII

☐ APPENDIX XII(R)

☐ APPENDIX XII(NR)

**Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3**
(See instructions on back)

Page 6 of 6 for

LINE NUMBER 15a

(Use separate schedule(s) for each numbered line)

Name of Candidate or Committee in full

North Texas Political Action Committee

Full Name, mailing address and ZIP code

Expando Production Co.
607 Hamilton Bldg.
Wichita Falls, TX 76301

Principal place of business

Expando Production Co.

Occupation

Oil & Gas Producers

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

Date (month,
day, year)

12/6/77

Amount of each
receipt this period

500.00

Full Name, mailing address and ZIP code

Jack Grace Production Co.
821 Petroleum Bldg.
Wichita Falls, TX 76301

Principal place of business

Jack Grace Production Co.

Occupation

Oil & Gas Producers

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

Date (month,
day, year)

11/20/77

Amount of each
receipt this period

500.00

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Date (month,
day, year)

Amount of each
receipt this period

Full Name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Date (month,
day, year)

Amount of each
receipt this period

Subtotal of receipts this page (optional) ▶ \$ 1,000.00

Total this period (last page this line number only) ▶ \$ 14,650.00

Section Commission
A Street, N.W.
Washington, D.C. 20461

Itemized Receipts,
Contributions, Ticket Purchases, Loans,
Rebates, and Transfers for Line
Numbers 15, 16, 17 and/or 18 of FEC Form 3
(See instructions on back)

Page 6 of 6 for

LINE NUMBER 15a

(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

North Texas Political Action Committee

Full Name, mailing address and ZIP code

Expando Production Co.
607 Hamilton Bldg.
Wichita Falls, TX 76301

Date (month,
day, year)

12/6/77

Amount of each
receipt this period

500.00

Principal place of business

Expando Production Co.

Occupation

Oil & Gas Producers

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

Full Name, mailing address and ZIP code

Jack Grace Production Co.
821 Petroleum Bldg.
Wichita Falls, TX 76301

Date (month,
day, year)

11/20/77

Amount of each
receipt this period

500.00

Principal place of business

Jack Grace Production Co.

Occupation

Oil & Gas Producers

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$ 500.00

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Full Name, mailing address and ZIP code

Date (month,
day, year)

Amount of each
receipt this period

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ \$

Subtotal of receipts this page (optional) ▶

\$ 1,000.00

Total this period (last page this line number only) ▶

\$ 14,650.00



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 546

Date Filmed 12/28/78 Camera No. --- 2

Cameraman BPC