



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 640
11/24/78 hpc





FEDERAL ELECTION COMMISSION

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

September 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles
1604 H Canterbury Lane
Mt. Pleasant, Michigan 48858

Re: MUR 640

Dear Mr. Tilles:

On September 13, 1978, the Commission determined there was no reasonable cause to believe that you violated 2 U.S.C. §441f in connection with the above captioned matter. Accordingly, the Commission intends to close its file.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

73010030543



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles
1604 H Canterbury Lane
Mt. Pleasant, Michigan 48858

Re: MUR 640

Dear Mr. Tilles:

On , 1978, the Commission determined there was no reasonable cause to believe that you violated 2 U.S.C. §441f in connection with the above captioned matter. Accordingly, the Commission intends to close its file.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

SD
9-15-78



FEDERAL ELECTION COMMISSION

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

September 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, Michigan 48655

RE: MUR 640

Dear Mr. Albosta:

On September 13, 1978, the Commission determined there was no reasonable cause to believe that the allegations you made indicated a violation of the Federal Election Campaign Act of 1971, as amended. Accordingly, the Commission intends to close its file in this matter.

If further information comes to your attention which you believe establishes a violation of the Act, please contact me.

Sincerely,

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

William C. Oldaker
General Counsel

7301030545

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

7 8 0 4 0 0 8 0 5 4 6
Mr. Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, Michigan 48655

Re: MUR 640

Dear Mr. Albosta:

On , 1978, the Commission voted to terminate its investigation of the allegations which you made in a complaint dated June 27, 1978. This matter was numbered MUR 640. Accordingly, the Commission intends to close its files in this matter.

If further information comes to your attention which you believe establishes a violation of the Federal Election Campaign Act of 1971, as amended, please contact me.

Sincerely,

William C. Oldaker
General Counsel

SD
9-15-78

September 8, 1978

MEMORANDUM TO: Marge Emons
FROM: Eliasa T. Carr
SUBJECT: MUR 640

Please have the attached General Counsel's Report
on MUR 640 distributed to the Commission on a 48 hour
tally basis.

Thank you.

78040080547

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Roger B. Tilles) MUR 640

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission do hereby certify that on September 13, 1978, the Commission determined by a vote of 5-0 to adopt the recommendations of the General Counsel to take the following actions in the above-captioned matter:

1. Find no reasonable cause to believe that Roger B. Tilles violated 2 U.S.C. §441f as alleged by Donald J. Albosta.
2. Send the letter attached to the General Counsel's Report dated September 8, 1978.
3. Close the file.

Voting for these determinations were Commissioners Harris Springer, Staebler Thomson, and Tiernan.

9/15/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

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)
)

MUR 640

GENERAL COUNSEL'S REPORT

Allegations

On June 30, 1978, the Commission received a complaint from Donald J. Albosta alleging that Roger B. Tilles, a candidate for the U.S. House of Representatives from the 10th District of Michigan, violated 2 U.S.C. §441f for receiving campaign funds from an outside source which he is reporting as personal funds. Mr. Albosta also alleged that Mr. Tilles may have received stock transfers from his family which would put them over their \$1000 contribution limitation in violation of 2 U.S.C. §441a(a)(1)(A).

Background

The complaint was based on two newspaper reports in connection with Mr. Tilles' finances. On March 20, 1978, Mr. Tilles released a financial statement which revealed \$15,780 net worth. Subsequently, Mr. Tilles contributed approximately \$10,000 to his campaign between March 20, 1978, and June 20, 1978. On June 20, 1978, Tilles stated to the press that he had "approximately \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market". Based on the March 20, 1978, financial statement of Roger Tilles and the contributions he made to his committee following that date, it appeared that there was a possible violation of 2 U.S.C. §441f.

On August 2, 1978, the Commission found reason to believe that Roger Tilles may have violated 2 U.S.C. §441f. Mr. Tilles responded to the Commission's notification letter on August 12, 1978 (Attachment I).

EVIDENCE AND ANALYSIS

Mr. Tilles' response included a copy of his financial statement dated March 20, 1978, and documents showing he had obtained bank notes which he used to finance his campaign since that date. All of the notes appear to have been made in the ordinary course of business.^{1/}

Mr. Tilles also disclosed his stock transactions during the period in question, and included the transaction confirmation slips sent to him by his stockbrokers. All of the transactions are in the name of Roger B. Tilles. There is no indication that Mr. Tilles received any stock transfers from his family or any outside source.

Mr. Tilles' financial activity between March 20, 1978, and June 20, 1978, is outlined below:

^{1/} The bankers who issued the notes were contacted by the Office of General Counsel. They advised that only Tilles signed the notes (i.e. there were no co-signers or guarantors) and that the interest rates were the usual rates.

Net worth (3-20-78)	\$ 15,780	
Contributions from Tilles To His Campaign (3-20-78 Thru 6-20-78)		(\$10,258)
Profits from Stock Market (3-20-78 Thru 6-20-78)	6,190	
Bank Note - June 19, 1978	12,325.34	
	<u>\$ 34,295.34</u>	(\$10,258)

Approximate Net Worth (6-20-78) \$ 24,037.34

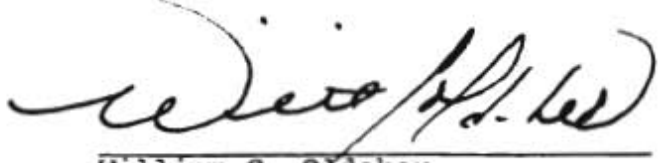
It appears that the documentation provided by Roger Tilles is consistent with his statements to the press in March and June, 1978, and there is no evidence that Mr. Tilles violated 2 U.S.C. §441f.

Recommendations

Find no reasonable cause to believe that Roger B. Tilles violated 2 U.S.C. §441f as alleged by Donald J. Albosta.
Send attached letters. Close the file.

Date:

9/8/78


William C. Oidaker
General Counsel

Attachments:

1. Response letter from Mr. Tilles with attached documents
2. Proposed letter to Mr. Tilles
3. Proposed letter to complainant
4. Certification

ROGER TILLES

Democrat U.S. Congress

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt. Pleasant, MI. 48858

Phone (517) 772-0875
(517) 772-9287

August 12, 1978

Mr. William Oldaker
General Counsel
Federal Elections Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

Responding to your letter of August 4, 1978, I enclose the following information as to the sources of my personal finances:

1. I have received loans and reported such receipt to the Federal Elections Commission in the following amounts:

June 19, 1978	\$12,500.00
July 21, 1978	\$12,000.00
August 1, 1978	\$10,000.00

(all unsecured renewable notes from European - American Bank and Trust Co. - 925 Hempstead Turnpike, Franklin Square, New York 11010 - Mr. Walter Vander Waag - Assistant Vice President - (516) 683-5000)

July 10, 1978 \$10,000.00

(unsecured renewable note from Michigan National Bank, Lansing, Michigan - Mr. Robert West - Assistant Vice President)

These loans have increased my total liabilities from the March 20, 1978 statement by \$44,500.00. Copies of all loan statements are enclosed.

2. My stock transactions from March 20 to date are as follows:

(A) On April 6, I bought 2 LVI Oct 25 @ $3\frac{1}{2}$ approximately \$700.00.
On April 19, I sold 2 LVI Oct @ $5\frac{3}{4}$ approximately \$1150.00
(profit \$450.00)

(B) On April 19, I bought 9 IGL July 40 @ $1\frac{1}{2}$ approximately \$1125.00
On May 18, I sold 9 IGL July 40 @ $2\frac{1}{2}$ approximately \$2,250.00
(profit \$1,150.00)

(This transaction is not noted by receipt - Merrill, Lynch and I are currently in dispute on payment sale)

(C) On May 3, I bought 10 FNM July 15 @ $7/8$ and on May 8, I bought 30 FNM July 15 @ $3/4$ approximately \$3,062.50.
On May 18, I sold 40 FNM July 15 @ $1\frac{3}{4}$ approximately \$7,000.00
(profit \$3,937.50)



ROGER TILLES

Democrat U.S. Congress

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt. Pleasant, MI. 48858

Phone (517) 772-0875
(517) 772-9287

- (D) On July 3, I sold 600 Genova Inc (previously held and listed on net worth statement @ $3\frac{1}{4}$ approximately \$1,950.00 (\$150.00 profit over worth of March 20)
- (E) On May 22, I sold BRNS July 15 @ 2 approximately \$600.00 (Shares on which this occurred 300 Brunswick previously held and listed on net worth statement) approximately \$600.00 profit.
- (F) On May 30, I received a \$52.50 dividend on the above mentioned Brunswick shares previously listed on net worth statement.
- (G) On July 24, 1978, the BRNS July 15 expired.
- (H) On July 24, 1978 I sold 300 shares of Brunswick at 15 approximately \$4,500.00 (same as net worth statement of March 20 shows)

Thus my total assets were increased from March 20 to date by stock purchase and sale by approximately \$6,340.00.

3. Virtually all cash from the March 20 statement has now been depleted plus all stock holdings and amounts receivable. I currently have approximately \$3,000.00 in cash, no stocks and bonds, no amounts receivable, approximately \$5,000.00 in furniture and a 1976 Olds Cutlass Salon worth approximately \$4,500.00. My present total assets therefore are approximately \$12,500.00.

4. With the inclusion of loans listed on page 1 along with the loans listed on the March 20 statement my present total liabilities are approximately \$56,500.00.

5. My present net worth now is approximately negative \$44,000.00 (a \$60,000.00 net loss from March 20).

I hope this explains to your satisfaction my spending and sources of revenue for the primary election of August 8, 1978.

Sincerely,

Roger Bruce Tilles

Certified Mail
Return Receipt Requested.

Authorized and paid for by the Roger Tilles for Congress Committee, 301 E. Broadway, Suite 212, Mt. Pleasant, MI 48858.
C. Small, Treasurer. Ph. (517) 772-0875 and (517) 772-9287.

A copy of our report is filed with the Federal Election Commission and is available for purchase from the
Federal Election Commission, Washington, D.C.



PROMISSORY NOTE

DATE JUL 10, 1978 DUE MAY 27, 1979 126 P.H. ☒ N ☐ F

PAY TO THE ORDER OF **Michigan National Bank** Lansing MICHIGAN

FOR THE SUM OF **Ten Thousand and no/100** - - - - - \$ **10,000.00**

ANNUAL PERCENTAGE RATE **10 3/4** % If paid to the bank the FINANCE CHARGE will be \$ **353.42** and the total

of payments will be \$ **10,353.42** The undersigned shall have the right to prepay this obligation either in whole or in part at any time without penalty.

Interest is calculated on the basis of 360 days per year for the actual outstandings days. This note is not secured by an

assignment of interest in any real or personal property and is subject to the accelerative rights therein.

Holder upon defaulting shall insure may without notice declare the unpaid balance to be immediately due and payable. The undersigned severally waive demand, notice

and protest, and any defense of extension of time or other indulgence by holder and to any substitution, exchange or release of collateral granted or permitted by the holder.

MAKERS HEREBY ACKNOWLEDGE RECEIPT OF A FILLED OUT DUPLICATE ORIGINAL COPY OF THIS NOTE, INCLUDING ALL DISCLOSURES HEREON.

Address **1604 H. Canterbury Trail** ☒ Signature: *[Signature]*

Mt. Pleasant, MI. 48858

10178 Rev. 7-77 Consumer Simple Interest Note

ORIGINAL

73010030554

7 3 0 1 0 3 0 5 5 5

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY		<input type="checkbox"/> BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO	VALUE DATE
				2761	6-19-78	030 C/L	6-19-78
NOTE NO	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGES	PROCEEDS	
00018	8-18-78	8.5	60	12,500.00	174.66	12,325.34	

DESCRIPTION

UNSECURED

ACCOUNT NUMBER 089 01 724 8

We have credited your account with the proceeds of the above note(s)

ROGER TILPS
405 EAST HIGHWAY STREET
ST JOHNS, MICHIGAN NY 48879

AUTHORIZED SIGNATURE

COMMERCIAL LOAN DEPARTMENT

Jjc

KEEP THIS STATEMENT AS A RECORD FOR YOUR INCOME TAX.

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY	<input type="checkbox"/> BANKING CORPORATION	UNIT NUMBER 2761	DATE PREPARED 7-21-78	REFERENCE NO. OCC C/L	VALUE DATE 7-21-78
NOTE NO. 00026	DUE DATE 8-18-78	RATE 8.5	DAYS 28	AMOUNT OF NOTE 12,000.00	INTEREST AND CHARGES 78.25
				PROFIT 11,921.75	

DESCRIPTION

UNSECURED

8/1/78 - 8.5

5/18/78

10,000.00

650

270.

ACCOUNT NUMBER 089 017 248

We have received your payment with this statement of the above note(s).

ROGER TILLES
405 EAST HIGHAM STREET
ST. JOHNS, MICHIGAN 48679

COMMERCIAL LOAN DEPARTMENT

KEEP THIS STATEMENT AS A RECORD FOR YOUR INCOME TAX.

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY	<input type="checkbox"/> BANKING CORPORATION	UNIT NUMBER 2761	DATE PREPARED 6-19-78	REFERENCE NO. OCC C/L	VALUE DATE 6-19-78
NOTE NO. 00018	DUE DATE 8-18-78	RATE 8.5	DAYS 60	AMOUNT OF NOTE 12,500.00	INTEREST AND CHARGES 174.66
				PROFIT 12,325.34	

DESCRIPTION

UNSECURED

ACCOUNT NUMBER 039 01 724 8

ROGER TILLES
405 EAST HIGHAM STREET
ST. JOHNS, MICHIGAN 48679

Dear Customer,

Payment is due on your note. If you haven't made arrangements for payment or renewal, please call the office in charge of your account prior to maturity.

Thank you

COMMERCIAL LOAN DEPARTMENT

dje

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY	<input type="checkbox"/> BANKING CORPORATION	UNIT NUMBER 2761	DATE PREPARED 8-1-78	REFERENCE NO. OCC C/L	VALUE DATE 8-1-78	
NOTE NO.	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGES	PROCEEDS
	8-18-78	8.5	91	10,000.00	39.59	9,960.41

DESCRIPTION:

ACCOUNT NUMBER 089 017 24 8

We have credited your account with the proceeds of the above note(s).

ROGER TILLES
405 EAST HIGHAM STREET
ST. JOHNS, MICH.

AUTHORIZED SIGNATURE

nn/eg

COMMERCIAL LOAN DEPARTMENT

KEEP THIS STATEMENT AS A RECORD FOR YOUR INCOME TAX

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY	<input type="checkbox"/> BANKING CORPORATION	UNIT NUMBER 2761	DATE PREPARED 7-22-78	REFERENCE NO. OCC C/L	VALUE DATE 7-21-78	
NOTE NO. 00026	DUE DATE 8-18-78	RATE 8.5	DAYS 28	AMOUNT OF NOTE 12,000.00	INTEREST AND CHARGES 78.25	PROCEEDS 11,921.75

DESCRIPTION:

UNSECURED

ACCOUNT NUMBER 089 017 24 8

ROGER TILLES
403 EAST HIGHAM STREET
ST. JOHNS, MICHIGAN 48879

Dear Customer,

Payment is due on your note. If you haven't made arrangements for payment or renewal, please call the office in charge of your account prior to maturity.

Thank you,

COMMERCIAL LOAN DEPARTMENT

GER TILLES

Democrat US Congress

Phone (517) 772-0875
(517) 772-9287

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt. Pleasant, MI. 48858

FINANCIAL STATEMENT AND NET WORTH
ROGER TILLES
MARCH 20, 1978

ASSETS

Cash	\$12,182.24
Stocks & Bonds	4,500.00
300 shares Brunswick	
600 shares Genova, Inc.	1,800.00
Accounts receivable	500.00
Furniture	5,000.00
1976 Olds	
Atlas Salon	5,000.00
Total Assets	\$29,982.24

LIABILITIES

Notes payable from State Employees Credit Union	\$ 9,500.00
Secured Car Loan from State Employees Credit Union	2,000.00

TOTAL LIABILITIES

* NET WORTH

TOTAL

\$13,300.00
16,730.24

\$29,982.24



OPEN ORDER CONFIRMATION

OFFICE AT Flint, Michigan DATE 4-6-68 ACCOUNT NO. 678-26197

WE CONFIRM THAT WE HAVE **Entered** OPEN ORDER(S) FOR YOUR ACCOUNT. PLEASE CHECK THE FOLLOWING ITEM(S) WITH YOUR RECORDS AND ADVISE US IMMEDIATELY IF THERE ARE ANY DISCREPANCIES.

TO BUY

TO SELL

2 LVI Oct. 25 @ 3½ -open eustr.

125 36 2443 6568

6568

678 26497

MR ROGER B TILLES
405 E HIGHWAY
ST JOHN MICH 48879

' 2-20-77N

IF THIS ORDER IS NOT EXECUTED
IT WILL AUTOMATICALLY BE
CANCELLED AT THE CLOSE OF
BUSINESS... 5:00 PM... OR AS
SOON THEREAFTER AS PRACTICABLE.

IMPORTANT: PLEASE READ CAREFULLY

2. SUBJECTS TO A SPECIAL CASE: LEMMA IS SUBJECT TO OUR AGREEMENT TO LEND NO SHARE OF THE REVENUE OF THE FILM TO ANY OTHER PARTY, AND THAT WE HAVE BEEN READY TO SIGN THE SHARES AND ANOTHER AGREEMENT TO LEND NO SHARE OF THE REVENUE OF THE FILM TO ANY OTHER PARTY.

1	BUY	2	SELL STOP	3.	SELL STOP LIMIT
THE FOLLOWING TYPE OF OPEN ORDERS ARE UNRESTRICTED					
1	SELL	2	BUY STOP	3	BUY STOP LIMIT

rate in a 74-hour week.



444 CHURCH ST
FLINT MI

TELEPHONE

313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF:

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT. OR STATE TAX	POST. REG. FEE	CHARGE OR MARK-UP/DOWN	NET AMOUNT
67326197	41978	41978	C 6 5.750000	115000		04	4285	110311
<p>YOU BOUGHT OR YOU SOLD</p> <p>SECURITY DESCRIPTION</p>								
SID	2	CALL LVI	025	LEVI STRAUSS CO				
EXP 10-21-78 NOCC				LVI JE OCT 025				
PACIFIC STOCK EXCHANGE				CLOSING TRANSACTION				

MR ROGER B TILLES :
405 E HIGHAM
ST JOHN MICH 48879

ZLVM1

WE 6568 TRADED FOR JN 00000 AS AN ODD LOT
BEFORE RUCK POSSESSION AND ON ARRIVAL AND AT THE
TIME OF YOUR TRANSACTION IT WAS HARD TO FIND A LONG OR
SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN PAI-
MENT ON COMPLETELY MISSED.

1. The first step is to identify the problem. This involves understanding the symptoms and the context in which the problem is occurring.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD. DATE OF SETTLEMENT DATE. DATE DUE AS INDICATED ABOVE. FOR SYMBOL, EXPLANATION REFER TO REVERSE SIDE WHERE DELIVERY ON OR BEFORE SETTLEMENT DATE WILL AVOID PREMIUM CHARGES. PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES. THE COMMISSIONER OF THE REVENUE DEPARTMENT OF THE STATE OF NEW YORK HAS DETERMINED THAT A COMMISSION OF ONE PERCENT PER SHARE IS ADDED TO THE PRICE OF PURCHASES OR DEDUCTED FROM SALES BY THE FUTURE FITTING ODD LOT BROKER AS PROVIDED BY THE RULES OF THE EXCHANGE. IN ALL OTHER CASES AN EXPLANATION WILL BE REQUIRED ON

IF YOU HAVE MOVED
OR PLAN TO MOVE,
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS.

© 2005 Blackwell Publishing Ltd, *Journal of Internal Medicine* 258: 117–127

Merrill Lynch
Pierce Fenner & Smith Inc. 444 CHURCH ST
FLINT MI 48502 313 767 6900

SECURITIES DUE

ACCOUNT NUMBER TRADE DATE

67826437 050878

PUR 30 CALL FNM 015
PUR FEDL NTL MTGE ASSN

TOTAL DUE

242675

file personal

DATE DUE IN
YOUR CHECK 050878 2FOL1
050878

CUSIP NUMBER

TYPE

0

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48353

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

6568

IT IS ESSENTIAL THAT YOU CONSULT
THE DESCRIPTIVE NOTES AND REG-
ULATORY REQUIREMENTS ON THE
REVERSE SIDE

IF YOU HAVE ALREADY PAID THIS AMOUNT
OR DEPOSITED THESE SECURITIES PLEASE DIS-
REGARD THIS NOTICE IF YOU HAVE ANY
QUESTIONS REGARDING THIS NOTICE PLEASE
CONTACT YOUR ACCOUNT EXECUTIVE IM-
MEDIATELY.

PLEASE WRITE YOUR ACCOUNT NUMBER ON THE REVERSE OF
YOUR CHECK, MONEY ORDER OR CASHIER'S CHECK
AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT

Merrill Lynch
Pierce Fenner & Smith Inc.

444 CHURCH ST
FLINT MI

48502

TELEPHONE
313-767-6900

WE CONFIRM THE FOLLOWING TRANSAC-
TION SUBJECT TO THE AGREEMENT ON
THE REVERSE SIDE HEREOF

ACCOUNT NUMBER

TRADE DATE

DATE DUE

PRICE

AMOUNT

INT OR STATE TAX

POSTING III

CHARGE OR
MARK UP/DOWN

NET AMOUNT

67826437

41978

41978

C 2

1.250000

112500

8869

121359

80T

9 CALL IGL 010

INTL MINRL CHEM PVS

EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE

IGL GH JUL 040
OPENING TRANSACTION

MR ROGER B TILLES
405 E HIGHAM
ST JOHN MICH 48879

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

21GM2

6568

IF YOU HAVE MOVED OR PLAN TO MOVE, NOTIFY YOUR ACCOUNT EXECUTIVE OF YOUR NEW ADDRESS

PLEASE WRITE YOUR ACCOUNT NUMBER ON THE REVERSE OF YOUR CHECK, MONEY ORDER OR CORRESPONDENCE AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE
DATE DUE AS INDICATED ABOVE FOR SYMBOL EXPLANATION
REFER TO REVERSE SIDE HEREOF. DELIVERY ON OR BEFORE SET-
TLEMENT DATE WILL AVOID PREMIUM CHARGES.
PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES
ON OTHER THAN ROUND LOTS (WHOLLY 100 SHARES) OF THE
NYSE AN AMOUNT OF 12% CENTS PER SHARE IS ADDED TO THE
PRICE OF PURCHASES OR DEDUCTED FROM SALES BY THE EXCHANG-
ING ODD LOT BROKERS AS PROVIDED BY THE RULES OF THE EXCHANGE
IN ALL OTHER CASES AN EXPLANATION WILL BE PROVIDED ON
REQUEST

COOD 2000 REV 11/77 PRINTED IN U.S.A.



**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

TELEPHONE

48502

313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT. OR STATE TAX	POST-BIG FEE	CHARGE OR MARK UP/DOWN	NET AMOUNT
67826497	50878	50878	C 3	750000	225000		19500	244500

QUANTITY
YOU BOUGHT OR YOU SOLD
801

CALL FNM

015

FEDL NTL MTGE ASSN

EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE

FNM GC JUL 015
OPENING TRANSACTION

file personal finance

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

ZFOL1
6568 00000

MERRILL LYNCH TRADES FOR ITS OWN ACCOUNT AS AN ODD LOT DEALER. BLOCK POSITIONING AND/OR ANTI-TRADEUR AND AT THE TIME OF YOUR TRANSACTION IT MAY HAVE HAD EITHER A LONG OR SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN PAID FULLY OR PARTIALLY REVERSED.

PLEASE WRITE YOUR ACCOUNT NUMBER AND SIGNATURE ON THE BACK OF YOUR CHECK, MONEY ORDER OR CASHIER'S CHECK AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE. DATE DUE AS INDICATED ABOVE. FOR SYMBOL, EXPLANATION REFER TO REVERSE SIDE HEREOF. DELIVERY ON OR BEFORE SETTLEMENT DATE WILL AVOID PREMIUM CHARGES. PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES. ON OTHER THAN ROUND LOTS, NORMALLY 100 SHARES, US NYSE AN AMOUNT OF 12 1/2 CENTS PER SHARE IS ADDED TO THE PRICE OF PURCHASES OR DEDUCTED FROM SALES BY THE EXECUTING ODD LOT BROKER AS PROVIDED BY THE RULES OF THE EXCHANGE. IN ALL OTHER CASES AN EXPLANATION WILL BE FURNISHED ON REQUEST.

IF YOU HAVE MOVED
OR PLAN TO MOVE,
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS.

FORM 7000 REV. 11-77 PRINTED IN U.S.A.



**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

TELEPHONE

48502

313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT. OR STATE TAX	POST-BIG FEE	CHARGE OR MARK UP/DOWN	NET AMOUNT
67826197	51878	51878	C 2	1.750000	700000	24	32608	667368

QUANTITY
YOU BOUGHT OR YOU SOLD
SLD

10

CALL FNM

015

FEDL NTL MTGE ASSN

EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE

FNM GC JUL 015
CLOSING TRANSACTION

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

ZFOL1
6568 00000

MERRILL LYNCH TRADES FOR ITS OWN ACCOUNT AS AN ODD LOT DEALER. BLOCK POSITIONING AND/OR ANTI-TRADEUR AND AT THE TIME OF YOUR TRANSACTION IT MAY HAVE HAD EITHER A LONG OR SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN PAID FULLY OR PARTIALLY REVERSED.

PLEASE WRITE YOUR ACCOUNT NUMBER AND SIGNATURE ON THE BACK OF YOUR CHECK, MONEY ORDER OR CASHIER'S CHECK AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE. DATE DUE AS INDICATED ABOVE. FOR SYMBOL, EXPLANATION REFER TO REVERSE SIDE HEREOF. DELIVERY ON OR BEFORE SETTLEMENT DATE WILL AVOID PREMIUM CHARGES. PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES. ON OTHER THAN ROUND LOTS, NORMALLY 100 SHARES, US NYSE AN AMOUNT OF 12 1/2 CENTS PER SHARE IS ADDED TO THE PRICE OF PURCHASES OR DEDUCTED FROM SALES BY THE EXECUTING ODD LOT BROKER AS PROVIDED BY THE RULES OF THE EXCHANGE. IN ALL OTHER CASES AN EXPLANATION WILL BE FURNISHED ON REQUEST.

IF YOU HAVE MOVED
OR PLAN TO MOVE,
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS.

personal finance file

FORM 7000 REV. 11-77

**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

48502

313/767 6900 0 0 3 1 5

SECURITIES DUE

ST NUMBER TRADE DATE

6497 070378

QUANTITY DESCRIPTION

600 GENOVA INC

AMOUNT DUE

071178 32113

CUSIP NUMBER

0

ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48859

6568

**IT IS ESSENTIAL THAT YOU CONSULT
THE DESCRIPTIVE NOTES AND
MATURITY REQUIREMENTS ON THE
REVERSE SIDE.**

IF YOU HAVE ALREADY PAID THIS AMOUNT
OR DEPOSITED THESE SECURITIES PLEASE DIS-
REGARD THIS NOTICE IF YOU HAVE ANY
QUESTIONS REGARDING THIS NOTICE PLEASE
CONTACT YOUR ACCOUNT EXECUTIVE IM-
MEDIATELY.

PLEASE WRITE YOUR ACCOUNT NUMBER SHOWN ABOVE ON THE
FACE OF YOUR CHECK NUMBER ORDER IS FURNISHED
AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT.

YOU HAVE MOVED
PLAN TO MOVE
YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

48502

TELEPHONE
313-767-6900

WE CONFIRM THE FOLLOWING TRANSAC-
TION SUBJECT TO THE AGREEMENT ON
THE REVERSE SIDE HEREOF.

ST NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT OR STATE TAX	POSSIBLE INT	CHARGE OR MARK UP/DOWN	NET AMOUNT
6497	70378	71178	1 3/4	195000		40	9229	195731
			SECURITY DESCRIPTION		CODE			
			GENOVA INC					

YOU HAVE MOVED
PLAN TO MOVE
YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48859

32113 372434100
568 14759

MERRILL LYNCH TRADES FOR ITS OWN ACCOUNT AS AN ODD LOT
BUYER. BIDDING REQUIREMENTS AND THE AGREEMENT AND AT THE
TIME OF YOUR TRANSACTION IT MAY HAVE HAD OTHER A LONG OR
SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN FOR
THEIR OWN ACCOUNT OR FOR OTHERS.

PLEASE WRITE YOUR ACCOUNT NUMBER ON THE REVERSE OF THE
FACE OF YOUR CHECK NUMBER ORDER IS FURNISHED
AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECUR-
ITIES SOLD ARE DUE ON SETTLEMENT DATE.
DATE DUE AS INDICATED ABOVE FOR SYMBOL. PAYMENT ON
DELIVERY TO BUYERS AND HEREON DELIVERY ON OR BEFORE SET-
TLEMENT DATE. ALL AROUND PREMIUMS. PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES.
ON VOUCHER THAN BOUND LOSS. PAYMENT IS THE SAME ON THE
DATE AN AMOUNT OF 12% (EIGHT PER HUNDRED) IS ADDED TO THE
PRICE OF PURCHASES OR DEDUCTED FROM SALES BY THE PARTY
ING ODD LOT BUYER AS PROVIDED BY THE RULES OF THE
IN ALL OTHER CASES AN EXPLANATION WILL BE FURNISHED UP
ON REQUEST.

CODE FROM REV. 11/77 PRINTED IN U.S.A.

ACCOUNT #	A/E #	PAGE #
	6	1
PERIOD ENDING 04 28 1978		
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

MR ROGER B TILLES
1634 CANTERBURY TR
MT PLEASANT MICH 48858

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
04 11	2		CALL LVI 025 LEVI STRAUSS & CO EXP 10-21-78 NOCC LVI JE OCT 025		9736.41
04 19	9		CALL IGL 040 INTL MNL CHM PVS EXP 07-22-78 NOCC IGL CH JUL 040	3.500000	\$1213.69
04 19		2	CALL LVI 025 LEVI STRAUSS & CO EXP 10-21-78 NOCC LVI JE OCT 025	1.250000	\$1107.11CR
04 21			DEPOSIT US FDS CLOSING BALANCE	5.750000	\$736.41CR \$106.58

LONG	SHORT	POSITION IN YOUR ACCOUNT	FX AS OF 04 27
9		CALL IGL 040 INTL MNL CHM PVS EXP 07-22-78 NOCC	1.6375

CAN YOU AFFORD TO BE WITHOUT THE MERRILL LYNCH MARKET LETTER? TO START YOUR SUBSCRIPTION, USE THE ORDER FORM IN THE ENCLOSED FOLDER.

FOR AN EXPLANATION OF CHARGES, PLEASE SEE REVERSE SIDE

CHARGES ARE IN FULL OF ALL SERVICES RENDERED BY MERRILL LYNCH, PIERCE, FENNER & SMITH, INC. (M&F) TO YOU. CHARGES ARE NOT TO BE PAID BY YOU TO ANY OTHER PARTY. CHARGES ARE NOT TO BE PAID BY YOU TO ANY OTHER PARTY. CHARGES ARE NOT TO BE PAID BY YOU TO ANY OTHER PARTY.

7 9 0 0 0 0 8 1 5 6 7

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
[REDACTED]		PERIOD ENDING 05 26 1978
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

file period

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
04 29			US FDS BALANCE APR 28		\$106.58
05 03	10		DEPOSIT 04/27		\$106.58CR
			CALL FNM 015		\$881.25
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
05 04			FNM GC JUL 015	.812500	
05 08	30		DEPOSIT 05/03		\$900.00CR
			CALL FNM 015		\$2445.00
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.750000	
05 09			DEPOSIT		\$2500.00CR
05 18		40	CALL FNM 015		\$6673.68CR
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	1.750000	
			US FDS CLOSING BALANCE		\$6747.43CR

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 05 25
9		CALL IGL 040	1.0000
		INTL MNRL CHEM PVS	
		EXP 07-22-78 NOCC	

PROFESSIONAL PORTFOLIO MANAGEMENT CAN HELP YOU OBTAIN THE RESULTS YOU WANT FROM YOUR PORTFOLIO. TO LEARN MORE, READ THIS MONTH'S STATEMENT ENCLOSURE.

7 2 9 4 0 7 8 1 5 6 4

Statement of
Security Account

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
PERIOD ENDING 05 26 1978		
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

file - personal finance

DATE	BOT/RECD	SOLD/DFID	DESCRIPTION	PRICE	AMOUNT
05 03	10		US FDS BALANCE * APR 28		\$106.58
			CALL FNM 015		\$881.25
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.812500	
05 04			DEPOSIT 05/03		\$900.00CR
05 06			DEPOSIT 04/27		\$106.58CR
05 08	30		CALL FNM 015		\$2445.00
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.750000	
05 09			DEPOSIT		\$2500.00CR
05 18		40	CALL FNM 015		\$6673.68CR
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	1.750000	
			US FDS CLOSING BALANCE		\$6747.43CR

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 05 25
9		CALL IGL 040	1.0000
		INTL MNRL CHEM PVS	
		EXP 07-22-78 NOCC	

PROFESSIONAL PORTFOLIO MANAGEMENT CAN HELP YOU OBTAIN THE RESULTS YOU WANT FROM YOUR PORTFOLIO. TO LEARN MORE, READ THIS MONTH'S STATEMENT ENCLOSURE.

7 2 3 4 9 7 8 0 5 6 1

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
[REDACTED]		PERIOD ENDING 07 28 1978
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48858

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
07 11		600	GENOVA INC	3 1/4	\$1857.31CR
07 20			CHECK F		\$1857.31
07 21	50		GENOVA INC	JE	
			RCD		
			AS OF 02 06 78		
07 24		9	CALL 1GL 040	EXPD	
			INTL MNRL CHEM PV5		
			EXP 07-22-78 NOCC		
07 24	100		GENOVA INC	RCD	
			US FDS CLOSING BALANCE		\$6.00

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 07 27
		450 GENOVA INC	N/A

MERRILL LYNCH READY ASSETS TRUST CAN HELP YOU TAKE ADVANTAGE OF TODAY'S HIGH INTEREST RATES. ASK YOUR ACCOUNT EXECUTIVE FOR A FREE PROSPECTUS.

73710780566

7 9 0 1 0 0 9 0 5 6 7



MANLEY, BENNETT, McDONALD & CO.

100 RENAISSANCE CENTER, 25th FLOOR
DETROIT, MICHIGAN 48243

033

NON-NEGOTIABLE

LINE #	NO	ACCOUNT NUMBER	DATE	AMOUNT *
33	060682	22-7202u-3-9	5/30/78	52.50

269

* PAYMENT FOR INCOME CREDITED TO YOUR TYPE 3 INCOME ACCOUNT FOR THE PRECEDING MONTH
REFER TO YOUR MONTHLY STATEMENT FOR DETAILS

ROGER B. TILLES
OFFICE OF THE SPEAKER
STATE CAPITOL
LANSING

MI 48901

*file personal
finance*

MEMBER NEW YORK STOCK EXCHANGE
AND OTHER LEADING EXCHANGES



MANLEY, BENNETT, McDONALD & CO.
100 RENAISSANCE CENTER
25th FLOOR
DETROIT, MICHIGAN 48243

BLOOMFIELD HILLS • FARM • GRAND RAPIDS
LANSING • OMROSSO • PLYMOUTH
SOUTHFIELD • TAYLORVILLE CITY • WARREN

YOU BOUGHT	YOU SOLD	300	BRUNSWICK CORP	CALL ASSIGNED	PRICE	15	M	C

file record fine

CU. 117043109000

106-1	8-07	PRINCIPAL	INTEREST	COMMISSION	STATE TAX	SEC FEE	OTHER	NET AMOUNT	DEBIT	CREDIT	STOCKS
450000				10626		15		439359	072478	072678	07246

ROGER B TILLES
OFFICE OF THE SPEAKER,
STATE CAPITOL
LANSING

MI 48901

FOR THE ACCOUNT OF:



2272024-2-1

204

8677841

00074

761

27

ON OTHER THAN ROUND LOTS, NORMALLY TWO
SHARES AND NOT MORE THAN FIVE SHOULD
BE THE PRICE ON THE EXCHANGE OR DETACHED ON
SALES. THE PRICE SHOULD BE THE EXCHANGE
THE TRADE WAS EXECUTED IN ALL CASES AND
EXPLANATION WILL BE PROVIDED ON REQUEST

SUBJECT TO CONDITIONS ON REVERSE SIDE

PLEASE NOTIFY US IMMEDIATELY OF ANY ERROR OR OMISSION

MEMBER NEW YORK STOCK EXCHANGE
AND OTHER LEADING EXCHANGES



MANLEY, BENNETT, McDONALD & CO.
100 RENAISSANCE CENTER
25th FLOOR
DETROIT, MICHIGAN 48243

BLOOMFIELD HILLS • FARM • GRAND RAPIDS
LANSING • OMROSSO • PLYMOUTH
SOUTHFIELD • TAYLORVILLE CITY • WARREN

YOU BOUGHT	YOU SOLD	3	CALL BRUNSWICK	JUL 15 1978	PRICE	2	M	C

CALL BRUNSWICK
JUL 15 1978
DETROIT, MICHIGAN 48243

file record fine

CU. 11704396039

137-1	8-07	PRINCIPAL	INTEREST	COMMISSION	STATE TAX	SEC FEE	OTHER	NET AMOUNT	DEBIT	CREDIT	STOCKS
5,000				4158		02		55840	052278	052378	05227

ROGER B TILLES
OFFICE OF THE SPEAKER
STATE CAPITOL
LANSING

MI 48901

FOR THE ACCOUNT OF:



2272024-3-4

204

9507259

00227

761

ON OTHER THAN ROUND LOTS, NORMALLY TWO
SHARES AND NOT MORE THAN FIVE SHOULD
BE THE PRICE ON THE EXCHANGE OR DETACHED ON
SALES. THE PRICE SHOULD BE THE EXCHANGE
THE TRADE WAS EXECUTED IN ALL CASES AND
EXPLANATION WILL BE PROVIDED ON REQUEST

SUBJECT TO CONDITIONS ON REVERSE SIDE

CONFIRMATION AND STATEMENT

PLEASE NOTIFY US IMMEDIATELY OF ANY ERROR OR OMISSION

89508004086



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, Michigan 48655

RE: MUR 640

Dear Mr. Albosta:

On , 1978, the Commission determined there was no reasonable cause to believe that the allegations you made indicated a violation of the Federal Election Campaign Act of 1971, as amended. Accordingly, the Commission intends to close its file in this matter.

If further information comes to your attention which you believe establishes a violation of the Act, please contact me.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles
1604 H Canterbury Lane
Mt. Pleasant, Michigan 48858

Re: MUR 640

Dear Mr. Tilles:

On , 1978, the Commission determined there was no reasonable cause to believe that you violated 2 U.S.C. §441f in connection with the above captioned matter. Accordingly, the Commission intends to close its file.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

7 3 0 1 0 0 3 0 5 7 0

ROGER TILLES

Democrat U.S. Congress

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt Pleasant, MI. 48858

Phone (517) 772-0875
(517) 772-9287

August 12, 1978

Mr. William Oldaker
General Counsel
Federal Elections Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

Responding to your letter of August 4, 1978, I enclose the following information as to the sources of my personal finances:

1. I have received loans and reported such receipt to the Federal Elections Commission in the following amounts:

June 19, 1978	\$12,500.00
July 21, 1978	\$12,000.00
August 1, 1978	\$10,000.00

(all unsecured renewable notes from European - American Bank and Trust Co. - 925 Hempstead Turnpike, Franklin Square, New York 11010 - Mr. Walter Vander Waag - Assistant Vice President - (516) 683-5000)

July 10, 1978 \$10,000.00

(unsecured renewable note from Michigan National Bank, Lansing, Michigan - Mr. Robert West - Assistant Vice President)

These loans have increased my total liabilities from the March 20, 1978 statement by \$44,500.00. Copies of all loan statements are enclosed.

2. My stock transactions from March 20 to date are as follows:

(A) On April 6, I bought 2 LVI Oct 25 @ $3\frac{1}{2}$ approximately \$700.00.
On April 19, I sold 2 LVI Oct @ $5\frac{3}{4}$ approximately \$1150.00
(profit \$450.00)

(B) On April 19, I bought 9 IGL July 40 @ $1\frac{1}{4}$ approximately \$1125.00
On May 18, I sold 9 IGL July 40 @ $2\frac{1}{4}$ approximately \$2,250.00
(profit \$1,150.00)

(This transaction is not noted by receipt - Merrill, Lynch and I are currently in dispute on payment sale)

(C) On May 3, I bought 10 FNM July 15 @ $7/8$ and on May 8, I bought 30 FNM July 15 @ $3/4$ approximately \$3,062.50.
On May 18, I sold 40 FNM July 15 @ $1\frac{3}{4}$ approximately \$7,000.00
(profit \$3,937.50)

ROGER TILLES

Democrat U.S. Congress

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt Pleasant, MI. 48858

Phone (517) 772-0875
(517) 772-9287

- (D) On July 3, I sold 600 Genova Inc (previously held and listed on net worth statement @ 3 $\frac{1}{2}$ approximately \$1,950.00 (\$150.00 profit over worth of March 20)
- (E) On May 22, I sold BRNS July 15 @ 2 approximately \$600.00 (Shares on which this occurred 300 Brunswick previously held and listed on net worth statement) approximately \$600.00 profit.
- (F) On May 30, I received a \$52.50 dividend on the above mentioned Brunswick shares previously listed on net worth statement.
- (G) On July 24, 1978, the BRNS July 15 expired.
- (H) On July 24, 1978 I sold 300 shares of Brunswick at 15 approximately \$4,500.00 (same as net worth statement of March 20 shows)

Thus my total assets were increased from March 20 to date by stock purchase and sale by approximately \$6,340.00.

3. Virtually all cash from the March 20 statement has now been depleted plus all stock holdings and amounts receivable. I currently have approximately \$3,000.00 in cash, no stocks and bonds, no amounts receivable, approximately \$5,000.00 in furniture and a 1976 Olds Cutlass Salon worth approximately \$4,500.00. My present total assets therefore are approximately \$12,500.00.

4. With the inclusion of loans listed on page 1 along with the loans listed on the March 20 statement my present total liabilities are approximately \$56,500.00.

5. My present net worth now is approximately negative \$44,000.00 (a \$60,000.00 net loss from March 20).

I hope this explains to your satisfaction my spending and sources of revenue for the primary election of August 8, 1978.

Sincerely,

Roger Bruce Tilles

Certified Mail
Return Receipt Requested.



PROMISSORY NOTE

DATE: 10/15/04 TO: 10/15/06 PAY TO THE ORDER OF: N F

FOR THE ORDER OF **Michigan National Bank**

Principal amount of \$10,000.00

ANNUAL PERCENTAGE RATE: 10 3/4 % FINANCE CHARGE: 353.42 and no total

Amount due: 10,353.42

Holder of this note may at any time without penalty

10/15/04

Holder hereby acknowledges receipt of a filled out duplicate original copy of this note including all disclosures hereon.

1604 H Canterbury Trail
Mt. Pleasant, MI. 48858

Signature: *[Handwritten Signature]*

10/15 Rev. 1-77 Consumer Finance Notes

ORIGINAL

730100305

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY		<input type="checkbox"/> BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO.	VALUE DATE
				2761	6-19-78	OCC C/L	6-19-78
NOTE NO.	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGE	PROCEEDS	
0003	8-18-78	8.5	60	12,500.00	174.66	12,325.34	
DESCRIPTION							

UNSECURED

ACCOUNT NUMBER 089 01 724 8

We have assigned an identification number to this proceeds (if there are more than one)

ROGER TILFS
405 EAST HIGHAM STREET
ST JOHNS, MICHIGAN NY 48879

WITHHOLDING INFORMATION

COMMERCIAL LOAN DEPARTMENT

djc

KEEP THIS STATEMENT AS A RECORD FOR YOUR INCOME TAX

1 2 5 0 8 0 0 1 0 0 7

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY		<input type="checkbox"/> BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO.	VALUE DATE
				2761	8-1-78	OCC C/L	8-1-78
NOTE NO.	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGES	PROCEEDS	
	8-18-78	8.5	91	10,000.00	39.59	9,960.41	
DESCRIPTION							

ACCOUNT NUMBER 089 017 24 8

We have credited your account with the proceeds of the above note(s).

ROGER TILLES
405 EAST HIGHAM STREET
ST. JOHNS, MICH.

mm/eg

COMMERCIAL LOAN DEPARTMENT

KEEP THIS STATEMENT AS A RECORD FOR YOUR INCOME TAX.

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY		<input type="checkbox"/> BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO.	VALUE DATE
				2761	7-22-78	OCC C/L	7 21-76
NOTE NO.	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGES	PROCEEDS	
000216	8-18-78	8.5	28	12,000.00	78.25	11,921.75	
DESCRIPTION							

UNSECURED

ACCOUNT NUMBER 089 017 248

ROGER TILLES
405 EAST HIGHAM STREET
ST. JOHNS, MICHIGAN 48879

Dear Customer,

Payment is due on your note. If you haven't made arrangements for payment or renewal, please call the office in charge of your account prior to maturity.

Thank you

COMMERCIAL LOAN DEPARTMENT

ROGER TILLES

Democrat U.S. Congress

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt. Pleasant, MI. 48858

Phone (517) 772-0875
(517) 772-9287

FINANCIAL STATEMENT REPORT WORTH ROGER TILLES Period: 10, 1978

ASSETS

Cash \$12,182.24
Stocks & Bonds
300 shares \$1,500.00
Brunswick
600 shares
Genova, Inc. 1,300.00
Accounts receivable 900.00
Furniture 5,000.00
1976 Olds
Citrus Salon 5,000.00

Total Assets \$29,082.24

LIABILITIES

Notes Payable from
State Employees
Credit Union \$2,500.00
Secured Car Loan
from State
Employees Credit
Union 3,000.00

TRUST FUNDING \$13,300.00
TOTAL \$19,780.24

TOTAL \$29,082.24

**Merrill Lynch
Pierce Fenner & Smith Inc.**

OPEN ORDER CONFIRMATION 8 7 5 7 7

OFFICE AT Flint, Michigan DATE 4-6 ACCOUNT NO. 678-26497

WE CONFIRM THAT WE HAVE Entered OPEN ORDER(S) FOR YOUR ACCOUNT. PLEASE CHECK THE FOLLOWING ITEM(S) WITH YOUR RECORDS AND ADVISE US IMMEDIATELY IF THERE ARE ANY DISCREPANCIES.

TO BUY

2 LVI Oct. 25 @ $\frac{3}{2}$ -open eustr.

MR ROGER B TILLES
405 E HIGHAM
ST JOHN MICH 48879

'2-20-77H

TO SELL

IF THIS ORDER IS NOT EXECUTED
IT WILL AUTOMATICALLY BE
CANCELLED AT THE CLOSE OF
BUSINESS... OR AS
SOON THEREAFTER AS PRACTICABLE.

IMPORTANT: PLEASE READ CAREFULLY

BUY STOP SELL STOP
SELL STOP BUY STOP

FORM 10-4 (REVISED) U.S.A.

**Merr. Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

67826497 41978 - 41978 C 6 5.750000

SLD 2 CALL LVI 025

EXP 10-21-78 NOCC
PACIFIC STOCK EXCHANGE

TELEPHONE

313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF

AMOUNT	INT OR STATE TAX	POST REG FEE	CHARGE OR MARK UP/DOWN	NET AMOUNT
48502				
115000		04	4285	110711

LEVI STRAUSS CO

LVI JE OCT 025
CLOSING TRANSACTION

MR ROGER B TILLES
405 E HIGHAM
ST JOHN MICH 48879

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

ZLVM1

6568 00000 AS AN ODD LOT
SEALY RITE POSITIONING AND OR ARBITRAGE AND AT THE
WE IN YOUR TRANSACTION IT MAY HAVE HAD EITHER A LONG OR
SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN PAR
TICULARLY COMPLETELY NEGATED

PLEASE ADVISE YOUR ACCOUNT NUMBER IMMEDIATELY ABOUT THE TOP
HALF OF YOUR ORDER NUMBER UNDER OR CORRESPONDENCE
AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE
IF DATE DUE AS INDICATED ABOVE FOR SYMBOL, EXPLANATION
REFER TO REVERSE SIDE HEREOF DELIVERY ON OR BEFORE SET
TLEMENT DATE WILL AVOID PREMIUM CHARGES
PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES
ON OTHER THAN ROUND LOTS (USUALLY 100 SHARES) ON THE
OVAL AN AMOUNT OF 12 1/2 CENTS PER SHARE IS ADDED TO THE
PRICE OF PURCHASE OR DEDUCTED FROM SALES BY THE EXCHG
AND ODD LOT BROKER AS PROVIDED BY THE RULES OF THE EXCHANGE
IN ALL OTHER CASES AN EXPLANATION WILL BE PROVIDED ON
REQUEST

FORM 1000 REV 11 77 PRINTED IN U.S.A.

7 2 0 1 0 0 8 2 5 7 3

Merrill Lynch 444 CHURCH ST
Pierce Fenner & Smith Inc FLINT MI 48502 313 767 6900

FUNDS OR SECURITIES DUE

ACCOUNT NUMBER TRADE DATE
 67826437 050878

QUANTITY DESCRIPTION
 30 CALL FNM 015
 FFDL NTL MTGE ASSN

file personal

050878 ZFOL1
 050878

0

TOTAL DUE 242625

add 2500

MR ROGER R TILLES
 1604 CANTERBURY TR
 MI PLEASANT MICH 48853

IF YOU HAVE MOVED
 OR PLAN TO MOVE,
 NOTIFY YOUR ACCOUNT
 EXECUTIVE OF YOUR
 NEW ADDRESS

6568

IT IS ESSENTIAL THAT YOU CONSULT
 THE "DESCRIPTIVE NOTES AND REG-
 ULATORY REQUIREMENTS" ON THE
 REVERSE SIDE OF THIS CONFIRMATION

IF YOU HAVE ALREADY PAID THIS ACCOUNT
 OR DEPOSITED THESE SECURITIES, PLEASE
 REGARD THIS NOTICE AS YOUR HAVE WITH
 QUESTIONS REGARDING THIS NOTICE, PLEASE
 CONTACT YOUR ACCOUNT EXECUTIVE
 IMMEDIATELY

PLEASE MAIL YOUR RETURN ADDRESS TO: ANTHONY J. TILLES
 1604 CANTERBURY TR, PLEASANT MICH 48853
 AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT

Merrill Lynch 444 CHURCH ST
Pierce Fenner & Smith Inc. FLINT MI 48502

TELEPHONE
 313-767-6900

ACCOUNT NUMBER TRADE DATE
 67826437 41978

AMOUNT PRICE
 41978 1.250000

48502

112500

INT OF STATE TAX

POS NEG

CHARGE OR MARK UP/DOWN

8869

121369

30T 9 CALL IGL 010

INTL MNRL CHEM PV5

EXP 07-22-78 NOCC
 CHICAGO BOARD OPTIONS EXCHANGE

IGL GH JUL 040
 OPENING TRANSACTION

file personal

MR ROGER R TILLES
 105 E HIGHAM
 ST JOHN MICH 48879

ZIGM2
 6568

PLEASE WRITE YOUR RETURN ADDRESS ABOVE ON THE
 BACK OF YOUR CHECK, MONEY ORDER OR CORRESPONDENCE
 AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES
 SOLD ARE DUE ON SETTLEMENT DATE
 DATE DUE AS INDICATED ABOVE FOR SYMBOL EXP DATE IN
 ORDER TO RECEIVE YOUR SECURITIES OR PAYMENT ON OR BEFORE SET-
 TLEMENT DATE WILL AVOID PREMIUM CHARGES
 PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES
 ON OTHER THAN ROUND LOTS (USUALLY 100 SHARES) ON THE
 DATE AN AMOUNT OF 12% CENTS PER SHARE IS ADDED TO THE
 PRICE OF PURCHASES OR DEDUCTED FROM SALES IN THE EXCHANGE
 (NOT ALL BROKERS PROVIDE BY THE RULES OF THE EXCHANGE
 IN ALL OTHER CASES AN EXPLANATION WILL BE PROVIDED ON
 REQUEST

IF YOU HAVE MOVED
 OR PLAN TO MOVE,
 NOTIFY YOUR ACCOUNT
 EXECUTIVE OF YOUR
 NEW ADDRESS

CODE 2000 REV 11-77 PRINTED IN U.S.A.



**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST.
FLINT MI

48502 TELEPHONE
213-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT OR STATE TAX	POST REG FEE	CHARGE OR MARK UP/DOWN	NET AMOUNT
67826497	50878	50878	C 3	750000	225000		19500	244500

BOI 10 CALL FNM 015

FEDL NTL MTGE ASSN

EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE

FNM GC JUL 015
OPENING TRANSACTION

file personal finance

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

ZFOL1
6568 00000

MERRILL LYNCH TRADES FOR ITS OWN ACCOUNT AS AN ODD LOT DEALER IN BULK POSITIONING AND/OR ARBITRAGE AND AT THE TIME OF YOUR TRANSACTION IT MAY HAVE HAD EITHER A LONG OR SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN PARTIALLY OR COMPLETELY HEDGED.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE. DATE DUE AS INDICATED ABOVE. FOR HYBRID, EXPANDED, OR OTHER TO RECEIVE NOTI-RECEIPT DELIVER ON DATE OF SETTLEMENT DATE. ALL ADDITIONAL CHARGES WILL BE ADDED TO THE PURCHASE PRICE. PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES. ON OTHER THAN ROUND LOTS, NORMALLY TWO CENTS LESS THAN AN AMOUNT OF TWO CENTS PER SHARE IS ADDED TO THE PURCHASE PRICE. IN OTHER THAN ROUND LOTS, THE PURCHASE PRICE IS ADDED TO THE PURCHASE PRICE. IN ALL OTHER CASES AN EXPLANATION WILL BE REQUESTED.

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

FORM 7000 REV 11-77 PRINTED IN U.S.A.



**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

48502 TELEPHONE
313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT OR STATE TAX	POST REG FEE	CHARGE OR MARK UP/DOWN	NET AMOUNT
67926197	51979	51979	C 3	1.750000	700000	24	32608	657168

SLD 10 CALL FNM 015

FEDL NTL MTGE ASSN

EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE

FNM GC JUL 015
CLOSING TRANSACTION

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

ZFOL1
6568 00000

MERRILL LYNCH TRADES FOR ITS OWN ACCOUNT AS AN ODD LOT DEALER IN BULK POSITIONING AND/OR ARBITRAGE AND AT THE TIME OF YOUR TRANSACTION IT MAY HAVE HAD EITHER A LONG OR SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN PARTIALLY OR COMPLETELY HEDGED.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE. DATE DUE AS INDICATED ABOVE. FOR HYBRID, EXPANDED, OR OTHER TO RECEIVE NOTI-RECEIPT DELIVER ON DATE OF SETTLEMENT DATE. ALL ADDITIONAL CHARGES WILL BE ADDED TO THE PURCHASE PRICE. PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES. ON OTHER THAN ROUND LOTS, NORMALLY TWO CENTS LESS THAN AN AMOUNT OF TWO CENTS PER SHARE IS ADDED TO THE PURCHASE PRICE. IN OTHER THAN ROUND LOTS, THE PURCHASE PRICE IS ADDED TO THE PURCHASE PRICE. IN ALL OTHER CASES AN EXPLANATION WILL BE REQUESTED.

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

personal finance file

FORM 7000 REV 11-77



**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

48502

313 767 6900 8 7 5 8 0

**FUNDS OR
SECURITIES DUE**

ACCOUNT NUMBER TRADE DATE
57826497 070378

SYMBOL QUANTITY DESCRIPTION
SLE 600 GENOVA INC

AMOUNT 071178 32113

CHARGE OR MARK UP/DOWN

0

ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48858

6568

IF YOU HAVE ALREADY PAID THIS AMOUNT
OR DEPOSITED THESE SECURITIES PLEASE DIS-
REGARD THIS NOTICE IF YOU HAVE ANY
QUESTIONS REGARDING THIS NOTICE PLEASE
CONTACT YOUR ACCOUNT EXECUTIVE IMM-
EDIATELY.

PLEASE WRITE YOUR ADDRESS & PHONE NO. ON THE REVERSE
SIDE OF YOUR CHECK. MONEY ORDER OR CASHIER'S CHECK.
PLEASE FORWARD TO THE OFFICE SERVING YOUR ACCOUNT.

IT IS ESSENTIAL THAT YOU CONSULT
THE "DESCRIPTIVE NOTES AND REG-
ULATORY REQUIREMENTS" ON THE
REVERSE SIDE. ~~SEE THE REVERSE SIDE~~

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

FORM 7000 REV. 11-77 PRINTED IN U.S.A.



**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

48502

TELEPHONE
313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION
SUBJECT TO THE AGREEMENT ON
THE REVERSE SIDE HEREOF.

ACCOUNT NUMBER TRADE DATE DATE DUE SYMBOL QUANTITY PRICE
57826497 070378 071178 1 3 1 3/4
SECURITY DESCRIPTION
GENOVA INC

AMOUNT
135000

INT OR STATE TAX

POST REG FEE

40

CHARGE OR
MARK UP/DOWN
9229

NET AMOUNT

125771

ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48858

071178 372434100
568 14759

MERRILL LYNCH TRADED FOR ITS OWN ACCOUNT AS AN ODD LOT
DEBIT. YOUR POSITION MAY BE AN ODD LOT. AND AT THE
TIME OF YOUR TRANSACTION, IT MAY HAVE HAD EITHER A LONG OR
SHORT POSITION IN THIS SECURITY, WHICH MAY HAVE BEEN FOR
PART OR COMPLETELY REDEEMED.

PLEASE WRITE YOUR FULL NAME AND ADDRESS ON THE
BACK OF YOUR CHECK, MONEY ORDER OR CORRESPONDENCE
AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECUR-
ITIES SOLD ARE DUE ON SETTLEMENT DATE.
SETTLEMENT DATE: AS INDICATED ABOVE. FOR SYMBOL EXPLANATION
REFER TO REVERSE SIDE HEREOF. DELIVERY ON OR BEFORE SET-
TLEMENT DATE WILL AVOID PREMIUM CHARGES.
PLEASE PRESERVE THIS COMPENSATION FOR INCOME TAX PURPOSES.
ON OTHER THAN ROUND LOTS, AN AMOUNT OF 100 SHARES, OR
1/10TH AN AMOUNT OF 10% CENTS PER SHARE IS ADDED TO THE
GROSS PURCHASE PRICE OR DEDUCTED FROM SALES BY THE EXCH-
ANGE. ODD LOT RULES AS PROVIDED BY THE RULES OF THE EXCH-
ANGE. IN ALL OTHER CASES, AN EXPLANATION WILL BE FURNISHED
UPON REQUEST.

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

FORM 7000 REV. 11-77 PRINTED IN U.S.A.

Personal

MIR ROGER B TILLES
 1604 CANTERBURY TR
 MT PLEASANT MICH 48858

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
PERIOD ENDING 04 28 1978		
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
04 11	2		CALL LVI 025 LEVI STRAUSS & CO EXP 10-21-78 NOCC		\$736.41
04 19	9		LVI JE OCT 025 CALL IGL 040 INTL MNCI CHLM PVS EXP 07-22-78 NOCC	3.500000	\$1213.69
04 19		2	IGL ON JUL 040 CALL LVI 025 LEVI STRAUSS & CO EXP 10-21-78 NOCC	1.250000	\$1107.11CR
04 21			LVI JE OCT 025 DEPOSIT US FDS CLOSING BALANCE	5.750000	\$736.41CR \$106.58

LONG	SHORT	POSITION IN YOUR ACCOUNT	FX AS OF 04 27
	9	CALL IGL 040 INTL MNCI CHLM PVS EXP 07-22-78 NOCC	1.6875

CAN YOU AFFORD TO BE WITHOUT THE LEPAGE LYNCH MARKET LETTER? TO
 START YOUR SUBSCRIPTION, USE THE ORDER FORM IN THE ENCLOSED FOLDER.

78040080581

Mr. Roger B. Tilles
1604 Canterbury Tr
Mt Pleasant Mich 48358

Statement
Special Attention

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
PERIOD ENDING 05 26 1978		
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

MR. ROGER B. TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48358

file record

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
04 29			US FDS BALANCE APR 28		\$106.58
05 03	10		DEPOSIT 04/27		\$106.58CR
			CALL FNM 015		\$881.25
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.812500	
05 04			DEPOSIT 05/03		\$900.00CR
05 08	30		CALL FNM 015		\$2445.00
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.750000	
05 09			DEPOSIT		\$2500.00CR
05 18		40	CALL FNM 015		\$6673.68CR
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	1.750000	
			US FDS CLOSING BALANCE		\$6747.43CR

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 05 25
	9	CALL IGL 040	1.0000
		INTL MNRL CHEM PVS	
		EXP 07-22-78 NOCC	

PROFESSIONAL PORTFOLIO MANAGEMENT CAN HELP YOU OBTAIN THE RESULTS YOU WANT FROM YOUR PORTFOLIO. TO LEARN MORE, READ THIS MONTH'S STATEMENT ENCLOSURE.

7304030582

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
PERIOD ENDING 05 26 1978		
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

file - personal finance

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
05 03	10		US FDS BALANCE APR 28		\$106.58
			CALL FNM 015		\$881.25
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.812500	
05 04			DEPOSIT 05/03		\$900.00CR
05 06			DEPOSIT 04/27		\$106.58CR
05 08	30		CALL FNM 015		\$2445.00
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.750000	
05 09			DEPOSIT		\$2500.00CR
05 18		40	CALL FNM 015		\$6673.68CR
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	1.750000	
			US FDS CLOSING BALANCE		\$6747.43CR

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 05 25
9		CALL IGL 040	1.0000
		INTL MRL CHEM PV5	
		EXP 07-22-78 NOCC	

PROFESSIONAL PORTFOLIO MANAGEMENT CAN HELP YOU OBTAIN THE RESULTS YOU WANT FROM YOUR PORTFOLIO. TO LEARN MORE, READ THIS MONTH'S STATEMENT ENCLOSURE.

23040030583

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
PERIOD ENDING 07 28 1978		
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48858

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
07 11		600	GENOVA INC	3 1/4	\$1857.31CR
07 20			CHECK F		\$1857.31
07 21	50		GENOVA INC	JE	
			RCD		
07 24		9	AS OF 02 06 78 CALL IGL 040 INTL MNRL CHEM PV5 EXP 07-22-78 NOCC	EXPD	
07 24	100		GENOVA INC	RCD	
			US FDS CLOSING BALANCE		\$.00

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 07 27
	450	GENOVA INC	N/A

MERRILL LYNCH READY ASSETS TRUST CAN HELP YOU TAKE ADVANTAGE OF TODAY'S HIGH INTEREST RATES. ASK YOUR ACCOUNT EXECUTIVE FOR A FREE PROSPECTUS.

73040789534

7 9 0 4 0 7 8 7 5 8 5



MANLEY, BENNETT, McDONALD & CO.

100 RENAISSANCE CENTER 25th FLOOR
DETROIT, MICHIGAN 48243

033

NON-NEGOTIABLE

CHECK NO.	ACCOUNT NUMBER	DATE	AMOUNT *
33 060682	22-72024-3-9	5/30/78	52.51

269

* PAYMENT FOR INCOME CREDITED TO YOUR TYPE 3 INCOME ACCOUNT FOR THE PRECEDING MONTH
REFER TO YOUR MONTHLY STATEMENT FOR DETAILS

ALGER A TILLES
OFFICE OF THE SPEAKER
STATE CAPITOL
LANSING

MI 48901

*file personal
finance*

48781 - HANDY FORMS CORP.

MEMBER NEW YORK STOCK EXCHANGE
AND OTHER LEADING EXCHANGES



MANLEY, BENNETT, McDONALD & CO.

100 RENAISSANCE CENTER
25th FLOOR
DETROIT, MICHIGAN 48243

BLOOMFIELD HILLS • FLINT • GRAND RAPIDS
LANSING • OWOSSO • PLYMOUTH
SOUTHFIELD • TRAVERSE CITY • WARREN

YOU BOUGHT	YOU SOLD		PRICE	M	C
	300	BRUNSWICK CORP CALL ASSIGNED	15	3	1

CU. 117043109000

file personal finance

186-1 8-07

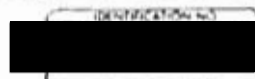
PRINCIPAL	INTEREST	COMMISSION	STATE TAX	SEC FEE	OTHER
450000		10626		15	

NET AMOUNT
439359

TRADE DATE	SETTLEMENT DATE	PROCESS DATE
072478	072878	0724

ROGER B TILLES
OFFICE OF THE SPEAKER,
STATE CAPITOL
LANSING

MI 48901



ACCOUNT NO
2272024-2-1

BR
204

SECURITY NO
8677841

00074

761

FOR THE ACCOUNT OF

ON OTHER THAN ROUND LOTS, NORMALLY 100
SHARES, AN AMOUNT MAY HAVE BEEN ADDED
TO THE PRICE ON PURCHASES OR DEDUCTED ON
SALES, DEPENDING UPON WHICH EXCHANGE
THE TRADE WAS EXECUTED. IN ALL CASES AN
EXPLANATION WILL BE PROVIDED ON REQUEST

27

SUBJECT TO CONDITIONS ON REVERSE SIDE

PLEASE NOTIFY US IMMEDIATELY OF ANY ERROR OR OMISSION

MEMBER NEW YORK STOCK EXCHANGE
AND OTHER LEADING EXCHANGES



MANLEY, BENNETT, McDONALD & CO.

100 RENAISSANCE CENTER
25th FLOOR
DETROIT, MICHIGAN 48243

BLOOMFIELD HILLS • FLINT • GRAND RAPIDS
LANSING • OWOSSO • PLYMOUTH
SOUTHFIELD • TRAVERSE CITY • WARREN

YOU BOUGHT	YOU SOLD		PRICE	M	C
		CALL TRU-SWICK JUL 15 CODE	2	5	1

EXP 17/22/1978
OPENING PLUS

CU. 117043966039

file personal finance

187-1 8-07

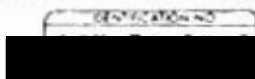
PRINCIPAL	INTEREST	COMMISSION	STATE TAX	SEC FEE	OTHER
50000		4158		02	

NET AMOUNT
55840

TRADE DATE	SETTLEMENT DATE	PROCESS DATE
052278	052378	0522

ROGER B TILLES
OFFICE OF THE SPEAKER
STATE CAPITOL
LANSING

MI 48901



ACCOUNT NO
2272024-3-4

BR
204

SECURITY NO
9507259

00227

761

FOR THE ACCOUNT OF

ON OTHER THAN ROUND LOTS, NORMALLY 100
SHARES, AN AMOUNT MAY HAVE BEEN ADDED
TO THE PRICE ON PURCHASES OR DEDUCTED ON
SALES, DEPENDING UPON WHICH EXCHANGE
THE TRADE WAS EXECUTED. IN ALL CASES AN
EXPLANATION WILL BE PROVIDED ON REQUEST

28

SUBJECT TO CONDITIONS ON REVERSE SIDE

PLEASE NOTIFY US IMMEDIATELY OF ANY ERROR OR OMISSION

Roger Tillis
1604-H Canterbury Trail
Mt. Pleasant, MI
48858

Mr. Wm. Oldaker
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, D.C.

20463



RECEIVED
FEDERAL ELECTION
COMMISSION

'78 AUG 15 AM 11:09

73040080587



FEDERAL ELECTION COMMISSION

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

August 4, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles-
1604 H. Canterbury Trail
Mt. Pleasant, Michigan 48858

RE: MUR 640

Dear Mr. Tilles:

The Federal Election Commission has received a complaint which alleges you committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 640.

The Commission has reason to believe that the matters alleged therein state a violation of 2 U.S.C. §441f. Specifically, it appears that the \$25,000 that you acquired in June, 1978, was not accounted for in your March 20, 1978, financial statement. It is alleged that part of the sum may have come from an outside source in violation of 2 U.S.C. §441f; and that the \$10,000 stock market profits may have come from your family which would put them over the \$1000 contribution limitation in violation of 2 U.S.C. §441a(1)(A).

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. These materials may include a statement of your assets at the time you became a candidate and a copy of the financial statement you gave to the press on March 20, 1978.

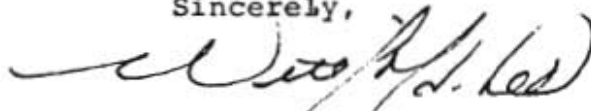
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

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

68518001022

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

11UK 640 - Donaldson

● 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. Roger B. Tillis
1004 N. Canterbury Rd
Mt Pleasant, Michigan 48858

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943997

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 8/8/78

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
MOUNT PLEASANT, MI
AUG 10 1978

★ GPO : 1977-O-234-337

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Roger Tilles)

MUR 640

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 2, 1978, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel in the above-captioned matter to find Reason to Believe that Roger Tilles is in violation of 2 U.S.C. §441f and to so inform the respondent.

Attest:

8/2/78
Date

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

7 8 0 4 0 0 8 0 5 0 1



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS *MWE*

DATE: JULY 31, 1978

SUBJECT: MUR 640 First General Counsel's Report
Dated- July 28, 1978
Received in the Office of the Commission
Secretary: 7-28-78, 11:41

The above named document was circulated on a 48 hour
vote basis at 3:00, July 28, 1978.

Commissioner Staebler submitted an objection at
4:26 p.m. on July 28, 1978, thereby placing MUR 640 on
the agenda for Wednesday, August 2, 1978.

A copy of Commissioner Staebler's vote sheet is
attached.

Attachment:
vote sheet

cc: Commissioner Staebler





FEDERAL ELECTION COMMISSION

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

 RECEIVED
 OFFICE OF THE
 COMMISSIONER

78 JUL 28 P 4: 26

Date and Time Transmitted: 3:00 July 28, 1978Commissioner StaubRETURN TO OFFICE OF COMMISSION SECRETARY BY: 3:00 AUGUST 1, 1978MUR No. 640 - First General Counsel's Report dated 7-28-78

() I approve the recommendation

(X) I object to the recommendation

COMMENTS:

IS RESPONDENT'S FIGURE
INCORRECT? 12,000 + 10,000 = "ABOUT 25,000"
Date: 7-28-78Signature: Neil Martin

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.

78040080592

July 28, 1972

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 640

Please have the attached First General Counsel's Report on MUR 640 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040080593

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION JUL 28 1978

MUR NO. 640
DATE COMPLAINT RECIEVED
BY OGC June 30, 1978

STAFF MEMBER(S) Donaldson

COMPLAINANT'S NAME: Donald J. Albosta/Albosta for Congress '78
P.O. Box 158
St. Charles, Michigan 48655

RESPONDENT'S NAME: Roger Tilles

RELEVANT STATUTE: 2 U.S.C. §441a(f)

INTERNAL REPORTS CHECKED: Roger Tilles for Congress Committee
Albosta for Congress '78

FEDERAL AGENCIES CHECKED:

SUMMARY OF ALLEGATIONS

It is alleged that Roger B. Tilles, a candidate for the U.S. House of Representatives from the Tenth District of Michigan, is receiving campaign contributions from an outside source that he is reporting as personal funds in violation of 2 U.S.C. §441f. Don Albosta who is Tilles' opponent in the Democratic primary on August 8, 1978, also alleges that there are possible stock transfers from Mr. Tilles' family which would violate 2 U.S.C. §441a(1)(A). (Attachment I).

EVIDENCE

On March 20, 1978, Mr. Tilles released a statement of his personal financial worth to the press, disclosing net worth of \$15,780, of which \$12,000 was cash. (Attachment II). In a newspaper article dated June 20, 1978, Mr. Tilles stated that he had "about \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market. (Attachment III). Tilles' reports reveal that he has spent the following personal funds for his primary election campaign:

4-17-88/12-31-77	\$11,492.77
1-1-78/3-31-78	1,983.97
1-25-78	1,000.00
2-10-78	750.00

3-10-78	6,000.00
4-1-78/6-30-78	4,378.11
6-13-78	5,880.00
*6-28-78	<u>12,325.34</u>
TOTAL	\$43,810.19

*(60 day unsecured note to candidate from European American Bank)

LEGAL ANALYSIS

Mr. Albosta interpreted Tilles' June 20th statement to mean that he had acquired \$25,000 plus \$10,000 from the stock market; however, it appears that the \$10,000 from the stock market was included in the \$25,000 total. In either case, it appears likely that the \$25,000 Tilles acquired in June, 1978, was not accounted for in his March 20, 1978, financial statement. The complainant contends that the stock market profits possibly came from recent transfers of stock by his family which would put them over the \$1000 contribution limitation in violation of 2 U.S.C. §441a(1)(A), but he supplies no evidence to support this.

Based on the March 20, 1978, financial statement of Roger Tilles, and the contributions he made to his committee following that date, it appears there is a possible violation of 2 U.S.C. §441f.

RECOMMENDATION

Find reason to believe that the matter alleged in the complaint states a violation of 2 U.S.C. §441f. Send attached letter.

DON ALBOSTA CONGRESS '78

ATTACHMENT 2
RECEIVED
FEDERAL ELECTION
COMMISSION

'78 JUN 30 PM 12:42

June 27, 1978

804086

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

Dear Sirs:

In compliance with statute 111.2 "Complaint: filing" in the Federal Election Commission: Regulations of April 1977 I am hereby requesting an investigation and audit of a candidate in the Democratic Primary Election. This complaint is filed against Roger B. Tilles, candidate for the 10th Congressional District of Michigan to the United States House of Representatives.

Complainant: Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, MI 48655

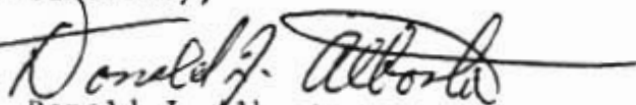
I, Donald J. Albosta, am requesting an investigation and audit of Mr. Tilles' campaign contributions under sections 100.4 "Contributions by persons," sub-sections (ii) and (iii) (A) and 110.1 "Contributions by persons," sub-section (a) (1). On March 20, 1978 Roger Tilles released a statement of his personal financial worth showing his total assets at \$29,000; liabilities of \$13,300 and a net worth of \$15,780. At the same time Mr. Tilles stated that he "spent about \$11,000 of his own money, and has added about \$9,000 so far this year." In June, 1978 "the candidate said he had about \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market."

My contention is that, if Roger Tilles, in June, 1978, came into some \$35,000 more, he is receiving this money from some outside source. It is very possible that the profit of \$10,000 in the stock market is from recent transfers of stock by his family in Long Island, New York. If this is the case, such a transference would be considered a campaign contribution under Section 100.4, Sub-section (iii) (A) which states "anything of value includes securities, goods, ..." and violates Section 110.1. As Mr. Tilles' family members have already contributed the maximum amount allowable, this would be a violation of the F.E.C. Regulations.

To substantiate my contentions I have enclosed copies of the newspaper articles from which this material has been compiled. I believe, using this as evidence, that an investigation and audit are in order.

Thank you for your cooperation in this matter.

Sincerely,



Donald J. Albosta
Candidate for Congress
10th District, Michigan

Enclosure

dmf

Donald J. Albosta personally appeared before me, a notary public on June 28, 1978 and swears the statement made by him is true and factual.


Donald J. Albosta

Notary Public
June 28, 1978

GLORIA SWEATLAND
Notary Public, Saginaw County, Mich.
My Comm. Expires July 30, 1980

MIDTOWN

Albosta gets opposition

Tilles declares bid for Congress

BY JOHN A. PURAVS
News Staff Writer

MIDLAND — Democrat Roger B. Tilles declared a candidacy for Congress today that he says has at least an even chance of unseating 13-term incumbent Republican Elford A. Cederberg in the 10th District.

Tilles, 31, an attorney who moved from St. Johns to Mount Pleasant three weeks ago, was kicking off a month of intensive campaigning and fund-raising with candidacy announcements today in Midland, Mount Pleasant and Traverse City.

However, the sessions were only a formality since Tilles has been campaigning in the 23-county district for more than a year.

So has Donald J. Albosta of St. Charles, the other declared contender for the Democratic nomination against Cederberg. But Albosta's campaign has run into staffing problems recently that prompted Tilles to

predict that if he faces a primary contest, he will win it.

Tilles said his optimism comes from being "right on target" with campaign goals that include raising as much as \$200,000, more than twice as much as any Democrat ever has spent in the district. Albosta spent more than \$60,000 in 1976 to take 42.8 percent of the vote against Cederberg.

Tilles today issued a financial sta-

tement that put his personal net worth at \$15,782.24, a move he said was prompted by "some comments I've heard about my tremendous wealth. I wish I had it, believe me."

In 1977, Tilles said he spent about \$11,000 of his own money, and has added about \$9,000 so far this year.

Of his remaining personal net worth, about \$12,000 is in cash, he said, and declared he's willing to spend that too in his election bid.

"There won't be that much money coming from my family," added Tilles, a native of Long Island, New York, where his family is in the contracting business. He noted campaign law limits individual contributions to \$1,000 per election.

But Tilles said he hopes to raise "\$10,000 in 10 days" during a series of campaign events starting March 27 in Owosso and continuing in Alma, Midland, Harrison, Cadillac, Big Rapids, Traverse City, Au Gres, St. Helens and Mount Pleasant, site of his campaign headquarters.

He said he also expects "substantial" help from business, especially in Midland and Mount Pleasant, and noted he has "good contacts" within the Michigan Democratic party.

An analysis in Congressional Quarterly said Tilles also may receive aid from "the wealthy Jewish community in the state," but Tilles today denied he

Democrats statewide are Jewish.

Tilles said the issue of his religion has not been raised so far in the campaign. "If it is raised, I hope it's raised publicly, because I would like to confront it publicly," he declared. "I have always been proud of my religion. I believe people in this district are too intelligent to succumb to this kind of bigotry."

Albosta, a farmer, has insisted the largely rural district never would elect a lawyer. Tilles admitted he has found "no overwhelming love for the legal profession," but contended voters "re-

spect the ability of lawyers to get things done because of their legal training."

Tilles said he was in private law practice only a year. He was elected to the State Board of Education in 1974 but resigned to become top aide to State House Speaker Bobby Crim. He resigned that post in February.

His campaign staff, Tilles said, now includes five full-time paid workers, plus 10 volunteers putting in at least 10 hours a week. All are from the 10th District, he noted.

ATTACHMENT 31
Michigan, MI
6/20/78
6/20/78
June 20, 1978

Tilles admits race tight for Democrat nomination

By JOHN A PALEN
Editor
The Daily News

Editor's journal

Roger Tilles is a former bureaucrat who says bureaucrats have too much power in American public life. Now he's seeking the Democratic nomination to run for Congress in the 10th District, and says more accountability for bureaucrats will be one of his main goals if he makes it all the way.

To make it into the race against the incumbent, Elford A. Cederberg, a Midland Republican seeking his 13th term in Congress, Tilles will have to make it past Don Albosta, who had the nomination two years ago and lost. Tilles concedes it will be a tight primary race.

A 32-year-old lawyer who now lives in Mount Pleasant, Tilles came by to see us the other day. Here's what we learned about him.

After growing up in Long Island, he graduated from Amherst and was certified for teaching at the C. W. Post College in New York. He never taught, going to the University of Michigan Law School instead, where he received his juris doctor degree.

Then it was into the bureaucracy, first as director of school law and legislation for the Michigan Department of Education for two years.

In 1973 he joined the law firm of David Laro, a University of Michigan regent, and after about a year ran for statewide office, successfully, for the state Board of Education. He had been a Democrat since 1960.

The board of education race gave him his first campaign exposure in the 10th District.

While on the state board, he also taught education law in the graduate program at Central Michigan University and was state chairman of the National Organization for Legal Problems in Education, whose accomplishment, he says, was the "education of our members."

Meanwhile, as a board of education member, he was trying unsuccessfully to deal with 2,000-page agendas "while the superintendent and the bureaucrats ran the show."

Frustrated with the office, he went into private law practice in 1975 with Abe Singer and Paul Rosenbaum, a

state senator who is trying for the Democratic nomination for U.S. Senator this year in a crowded field.

Eight months later, Bobby Crim, Speaker of the Michigan House, "asked me to give everything up" and be Crim's executive secretary, a position Crim had held under former Speaker William Ryan.

Tilles took the job, he says, because "it was a chance to do things for him (Crim) that I had wanted to do on the state board."

In February of this year, he resigned to run for Congress, and moved recently from St. John to Mount Pleasant, nearer the center of the big district.

It will be "a very tight race" against Albosta, Tilles concedes. "Don has the name identification, but he has not campaigned very vigorously."

Albosta's main drawback, from Tilles' point of view, is that he is a one-issue candidate, that issue being PBB, the chemical contaminant of the state's food chain of which Albosta was an early and vocal critic.

"I agree with him in substance," Tilles said, "but I vehemently disagreed with his approach."

"In 1975 and '76, when we were trying to do research and butt heads against the bureaucrats, he was taking his road show out. He hurt our efforts to get something done."

"We were doing it quietly, while he was having public hearings. He was abrasive and strident, without having done his homework, and he tended to polarize the community."

"The legislature became polarized. Nobody had respect for the results of the circus hearings. He probably slowed our legislative action."

Tilles says his opponent "was also interested in the conspiracy theory," a theory which Tilles doesn't totally discount. There was foot-dragging, he says, in the Farm Bureau, at whose elevator the contaminated feed was mixed, and there was foot-dragging among the bureaucrats in the departments of health and agriculture.

"Our interest was human needs. The bureaucrats were responsive to special interest, instead of the public interest. We need to regain power back from the bureaucrats."

Tilles charges that both parties tend to walk away from problems, but he says there is a younger element in the Michigan Congressional delegation — Bob Traxler, Carl D. Pursell, David A. Stockman, Dale E. Kildee, M. Robert Carr, William M. Brodhead and James J. Blanchard — that he hopes to join.

He contrasts with them what he calls "oldtimers" like Cederberg and Rep. Charles C. Diggs.

Money is a big concern in both the primary and general elections. Tilles said he expects it will cost \$175,000 for him to make it all the way, and he expects Cederberg to spend about \$200,000.

The candidate said he had about \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market. "The question is, when to put it in," he said.

One of his complaints about Cederberg is that the Congressman is supported by the major oil companies and other big national business interests. By contrast, "our campaign will be based in the district," he said.

He says, however, that he has accepted support from the National Committee for an Effective Congress, with whose stand for public financing of campaigns and an end to the seniority system he agrees.

He also has the support of the National and Michigan Education Associations, plus some other scattered labor backing, and is seeking contributions from the Dow and Dow Corning Political Action Committees.

He would accept money from the MEA and NEA, he says, because although they are vested interests, "I am pro public education."

On issues other than the bureaucracy, Tilles took these positions:

— Rural areas like the 10th district need federal aid with problems like housing, redevelopment and unemployment. Such aid is now aimed primarily at the cities.

— The nation needs a strong defense, but Cederberg is "going beyond even what the Pentagon asks for."

— Tilles is personally opposed to abortion, but since it is now legal under certain circumstances, he doesn't see how the federal government can cut off payments to the poor for abortions.

— He agrees with an emphasis on human rights in the nation's foreign policy, "to a realistic extent," but says there are a lot of human rights problems in this country, and that it is important not to be hypocritical about that.

— The job of a Congressman involves "being a manager of affairs and getting things for the people of the district. But it can be more than that. One Congressman can make a large impact, if he says 'I'm not going to vote until I've thought it through.'"



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles
1604 H. Canterbury Trail
Mt. Pleasant, Michigan 48858

RE: MUR 640

Dear Mr. Tilles:

The Federal Election Commission has received a complaint which alleges you committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 640.

The Commission has reason to believe that the matters alleged therein state a violation of 2 U.S.C. §441f. Specifically, it appears that the \$25,000 that you acquired in June, 1978, was not accounted for in your March 20, 1978, financial statement. It is alleged that part of the sum may have come from an outside source in violation of 2 U.S.C. §441f; and that the \$10,000 stock market profits may have come from your family which would put them over the \$1000 contribution limitation in violation of 2 U.S.C. §441a(1)(A).

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. These materials may include a statement of your assets at the time you became a candidate and a copy of the financial statement you gave to the press on March 20, 1978.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

-2-

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

100-3010030601



FEDERAL ELECTION COMMISSION

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

July 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Donald J. Albosta
P.O. Box 158
St. Chrls, MI 48655

Dear Mr. Albosta:

This is to acknowledge receipt of your complaint of July 3, 1978, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for the handling of complaints.

Sincerely yours,

William C. Oldaker
General Counsel

Charles N. Steele
Charles N. Steele
Associate General Counsel

640

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. The following service is requested (check one):		
<input type="checkbox"/>	Show to whom and date delivered.....c	
<input checked="" type="checkbox"/>	Show to whom, date, and address of delivery.....c	
<input type="checkbox"/>	RESTRICTED DELIVERY	
<input type="checkbox"/>	Show to whom and date delivered.....c	
<input type="checkbox"/>	RESTRICTED DELIVERY	
<input type="checkbox"/>	Show to whom, date, and address of delivery. \$.....	
(CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: Donald J. Albosta		
3. ARTICLE DESCRIPTION:		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	943 524	
(Always obtain signature of addressee or agent)		
I have received the article described above.		
SIGNATURE	<input type="checkbox"/> Addressee	<input type="checkbox"/> Authorized agent
<i>Charles N. Steele</i>		
4. DATE OF DELIVERY: 7-10-78		
5. ADDRESS (Complete only if registered)		
6. UNABLE TO DELIVER BECAUSE:		
		CLERK'S INITIALS <i>MC</i>

DON ALBOSTA CONGRESS '78

RECEIVED
FEDERAL ELECTION
COMMISSION

1978 JUN 30 PM 12:42

June 27, 1978

804086

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

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Complainant: Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, MI 48055


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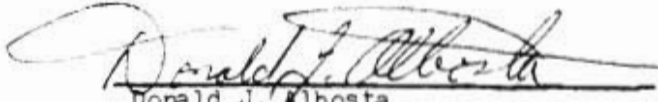
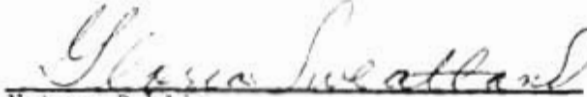


Donald J. Albosta
Candidate for Congress
10th District, Michigan

Enclosure

dmf

Donald J. Albosta personally appeared before me, a notary public on June 28, 1978 and swears the statement made by him is true and factual.


Donald J. Albosta

Notary Public
June 28, 1978

— GLORIA SWEATLAND
Notary Public, Saginaw County, Mich.
My Comm. Expires July 30, 1980

Tilles admits race tight for Democrat nomination

By JOHN A PALEN
Editor
The Daily News

Editor's journal

Roger Tilles is a former bureaucrat who says bureaucrats have too much power in American public life. Now he's seeking the Democratic nomination to run for Congress in the 10th District, and says more accountability for bureaucrats will be one of his main goals if he makes it all the way.

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— The job of a Congressman involves "being a manager of affairs and getting things for the people of the district. But it can be more than that. One Congressman can make a large impact, if he says 'I'm not going to vote until I've thought it through.'"

What into ring for Congress

By JIM HARGER
Sun Staff Writer

MOUNT PLEASANT—Roger Tilles says a lot of voters in the 10th Congressional District don't like Representative Elford Cederberg, but they've never had anyone they'd vote for instead.

The 31-year-old Democrat said Monday he is someone they'll vote for instead of Cederberg as he announced his candidacy for the 10th Congressional seat.

Tilles is a former member of the State Board of Education and recently resigned as Executive Secretary to State House Speaker Bobby Crim.

Now a full-time candidate, Tilles recently moved from St. Johns to Mount Pleasant, where he has located his campaign headquarters for the 23-county district.

"I have heard over and over again that what we need is a representative who is vigorous, energetic and experienced at getting things done," said Tilles at a noon press conference at the Mount Pleasant Holiday Inn.

"I am capable and willing to bring that kind of representation to the people of the 10th," he said.

Promising to run a campaign that is "very open and clean," Tilles conducted two other press conferences in Traverse City and Midland Monday to announce his candidacy.

Also in Mount Pleasant Monday was Phil Power, a Democratic candidate for Sen. Robert Griffin's seat in the U.S. Senate.

Power was on hand for the Tilles announcement, although he said the crossing of the two campaigns was not on purpose. He said he was in the area trying to build support for his effort. For details on Power's push for the Senate, see Wednesday's Morning Sun.

Tilles said he will have to draw votes from persons who traditionally have voted for Cederberg because the Democrats have not offered viable candidates challenging Cederberg.

That group of voters he will need to win includes educators, students, farmers and senior citizens, said Tilles, outlining his campaign strategy.

Cederberg does not respond to the needs within his district, said Tilles. "We can no longer sit idly by allowing economic stimulation legislation that affects us in the 10th pass us by," he said. "We must ask ourselves, in dollars and cents, what our current representative has done for us."

"I don't think we should sit by and allow other congressmen to decide what this district should have and should not have," said Tilles. "We need aggressive leadership in Congress so that the interests of the district are provided for and protected."

Tilles attacked Cederberg for his current stance on a bill extending the aid for college students to middle-income families.

Tilles said he was told Monday morning that Cederberg was attacking the plan on the floor of the House because of a technicality. "Whenever we need human service programs that would benefit the 10th District, Mr. Cederberg opposes them," said Tilles.

Tilles promised to fight for economic stimulus programs that would fight the high unemployment found in the 10th District. He also promised to obtain aid for new industries finding alternative sources of energy and new forms of energy.

Tilles also promised to fight for improved health care for senior citizens and production incentives for farmers.

Dow Chemical, one of the district's largest employers, also received kind words from Tilles as he vowed to work for legislation that would "bring up the standards of others to the high standards of Dow."

Tilles' background in education showed strongly in his campaign promises as he recalled his past record in the field.

"I have learned and helped to solve major problems which face our schools through my chairmanship of the Education Legislation Advisory Council, as State Director of School Law and Legislation, as an instructor of school law at Central Michigan University and as a member of the State Board of Education," said Tilles.

"I know education and I know I can vigorously work to bring about fair and realistic approaches to education in Michigan," said Tilles. "I now feel it is time to carry my work to Washington so that we can continue to build better learning environments for our children and our future."

Tilles also recalled his past record as Crim's top aide in cutting back on bureaucracies and their growth. "In my three years with the house, I helped hammer out legislation that took the first major step toward curbing the growth of the bureaucracy in Michigan," he said.

If Tilles is to win the 10th Congressional seat, he may have to first beat out St. Charles Democrat Donald Albosta in a primary race. Tilles said he would welcome a primary battle because the issues in the campaign would gain more attention.

Tilles also began his campaign by disclosing a statement of his financial assets and liabilities. Tilles challenged Albosta and Cederberg to do the same.

According to the statement, Tilles has \$29,062 in assets and \$13,300 in total liabilities, giving him a net worth of \$15,762.

MIDTOWN

Albosta gets opposition

Tilles declares bid for Congress

BY JOHN A. PURAVS
News Staff Writer

MIDLAND — Democrat Roger B. Tilles declared a candidacy for Congress today that he says has at least an even chance of unseating 13-term incumbent Republican Elford A. Cederberg in the 10th District.

Tilles, 31, an attorney who moved from St. Johns to Mount Pleasant three weeks ago, was kicking off a month of intensive campaigning and fund-raising with candidacy announcements today in Midland, Mount Pleasant and Traverse City.

However, the sessions were only a formality since Tilles has been campaigning in the 23-county district for more than a year.

So has Donald J. Albosta of St. Charles, the other declared contender for the Democratic nomination against Cederberg. But Albosta's campaign has run into staffing problems recently that prompted Tilles to

predict that if he faces a primary contest, he will win it.

Tilles said his optimism comes from being "right on target" with campaign goals that include raising as much as \$200,000, more than twice as much as any Democrat ever has spent in the district. Albosta spent more than \$100,000 in 1976 to take 42.9 percent of the vote against Cederberg.

Tilles today issued a financial state-

ment that put his personal net worth at \$15,782.24, a move he said was prompted by "some comments I've heard about my tremendous wealth. I wish I had it, believe me."

In 1977, Tilles said he spent about \$11,000 of his own money, and has added about \$3,000 so far this year.

Of his remaining personal net worth, about \$12,000 is in cash, he said, and declared he's willing to spend that too in his election bid.

"There won't be that much money coming from my family," added Tilles, a native of Long Island, New York, where his family is in the contracting business. He noted campaign law limits individual contributions to \$1,000 per election.

But Tilles said he hopes to raise "\$10,000 in 10 days" during a series of campaign events starting March 27 in Owosso and continuing in Alma, Midland, Harrison, Cadillac, Big Rapids, Traverse City, Au Gres, St. Helens and Mount Pleasant, site of his campaign headquarters.

He said he also expects "substantial" help from business, especially in Midland and Mount Pleasant, and noted he has "good contacts" within the Michigan Democratic party.

Democrats statewide are Jewish."

Tilles said the issue of his religion has not been raised so far in the campaign. "If it is raised, I hope it's raised publicly, because I would like to confront it publicly," he declared. "I have always been proud of my religion. I believe people in this district are too intelligent to succumb to this kind of bigotry."

Albosta, a farmer, has insisted the largely rural district never would elect a lawyer. Tilles admitted he has found "no overwhelming love for the legal profession," but contended voters "re-

spect the ability of lawyers to get things done because of their legal training."

Tilles said he was in private law practice only a year. He was elected to the State Board of Education in 1974 but resigned to become top aide to State House Speaker Bobby Crim. He resigned that post in February.

His campaign staff, Tilles said, now includes five full-time paid workers, plus 10 volunteers putting in at least 10 hours a week. All are from the 10th District, he noted.

DON ALBOSTA CONGRESS '78

P.O. Box 158

St. Charles, Michigan 48655



JUN 30 PM 12:42

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

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 369

11/24/78 B.P.C.





FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR #

640

Date Filmed _____ Camera No. --- 2

Cameraman _____

MUR 640

640 DE 2100000

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
Page 13 of 100

3. ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.
943249

(Always obtain signature of addressee or agent)

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

DATE OF DELIVERY 9-23-78 POSTMARK 1410

5. ADDRESS (Complete only if requested)
2155 W. Big Bear Ave

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

Muk 640 - Donaldson

PS Form 3811, Apr 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

<p>● SENDER Complete items 1, 2, and 3 Add your address in the "RETURN TO" space on reverse</p>		
<p>1. The following service is requested (check one).</p> <p><input type="checkbox"/> Show to whom and date delivered _____ c</p> <p><input checked="" type="checkbox"/> Show to whom, date, and address of delivery _____ c</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered _____ c</p> <p><input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery \$ _____</p> <p>(CONSULT POSTMASTER FOR FEES)</p>		
<p>2. ARTICLE ADDRESSED TO</p> <p>Donald G. Albosta Albosta for Congress - 78 P.O. Box 158 St. Charles, Michigan 48061</p>		
<p>3. ARTICLE DESCRIPTION</p> <p>REGISTERED NO. CERTIFIED NO. INSURED NO.</p> <p>943248</p>		
<p>(Always obtain signature of addressee or agent)</p>		
<p>I have received the article described above.</p> <p>SIGNATURE <input type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent</p> <p>Donny Albosta</p>		
<p>4. DATE OF DELIVERY</p> <p>9-20-78</p>		<p>POSTMARK</p> <p>SEP 20 1978</p> <p>CLERK'S INITIALS</p>
<p>5. ADDRESS (Complete only if requested)</p> <p>P.O. Box 158</p>		
<p>6. UNABLE TO DELIVER BECAUSE</p>		



FEDERAL ELECTION COMMISSION

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

September 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles
1604 H Canterbury Lane
Mt. Pleasant, Michigan 48858

Re: MUR 640

Dear Mr. Tilles:

On September 13, 1978, the Commission determined there was no reasonable cause to believe that you violated 2 U.S.C. §441f in connection with the above captioned matter. Accordingly, the Commission intends to close its file.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

79011080543



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles
1604 H Canterbury Lane
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Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

SD
9-15-78



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

September 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, Michigan 48655

RE: MUR 640

Dear Mr. Albosta:

On September 13, 1978, the Commission determined there was no reasonable cause to believe that the allegations you made indicated a violation of the Federal Election Campaign Act of 1971, as amended. Accordingly, the Commission intends to close its file in this matter.

If further information comes to your attention which you believe establishes a violation of the Act, please contact me.

Sincerely,

William C. Oldaker
General Counsel

790103191;
790103191545

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, Michigan 48655

Re: MUR 640

Dear Mr. Albosta:

On , 1978, the Commission voted to terminate its investigation of the allegations which you made in a complaint dated June 27, 1978. This matter was numbered MUR 640. Accordingly, the Commission intends to close its files in this matter.

Of further information comes to your attention which you believe establishes a violation of the Federal Election Campaign Act of 1971, as amended, please contact me.

Sincerely,

William C. Oldaker
General Counsel

SD
9-15-76

September 8, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 640

Please have the attached General Counsel's Report
on MUR 640 distributed to the Commission on a 48 hour
tally basis.

Thank you.

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78040080547

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 640
Roger B. Tilles)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission do hereby certify that on September 13, 1978, the Commission determined by a vote of 5-0 to adopt the recommendations of the General Counsel to take the following actions in the above-captioned matter:

1. Find no reasonable cause to believe that Roger B. Tilles violated 2 U.S.C. §441f as alleged by Donald J. Albosta.
2. Send the letter attached to the General Counsel's Report dated September 8, 1978.
3. Close the file.

Voting for these determinations were Commissioners Harris Springer, Staebler Thomson, and Tiernan.

9/15/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary : 9-8-78, 5:06
Circulated on 48 hour vote basis : 9-11-78, 4:00

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73040030548

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 640
Roger B. Tilles)

GENERAL COUNSEL'S REPORT

Allegations

On June 30, 1978, the Commission received a complaint from Donald J. Albosta alleging that Roger B. Tilles, a candidate for the U.S. House of Representatives from the 10th District of Michigan, violated 2 U.S.C. §441f for receiving campaign funds from an outside source which he is reporting as personal funds. Mr. Albosta also alleged that Mr. Tilles may have received stock transfers from his family which would put them over their \$1000 contribution limitation in violation of 2 U.S.C. §441a(a)(1)(A).

Background

The complaint was based on two newspaper reports in connection with Mr. Tilles' finances. On March 20, 1978, Mr. Tilles released a financial statement which revealed \$15,780 net worth. Subsequently, Mr. Tilles contributed approximately \$10,000 to his campaign between March 20, 1978, and June 20, 1978. On June 20, 1978, Tilles stated to the press that he had "approximately \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market". Based on the March 20, 1978, financial statement of Roger Tilles and the contributions he made to his committee following that date, it appeared that there was a possible violation of 2 U.S.C. §441f.

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79010030549

On August 2, 1978, the Commission found reason to believe that Roger Tilles may have violated 2 U.S.C. §441f. Mr. Tilles responded to the Commission's notification letter on August 12, 1978 (Attachment I).

EVIDENCE AND ANALYSIS

Mr. Tilles' response included a copy of his financial statement dated March 20, 1978, and documents showing he had obtained bank notes which he used to finance his campaign since that date. All of the notes appear to have been made in the ordinary course of business.^{1/}

Mr. Tilles also disclosed his stock transactions during the period in question, and included the transaction confirmation slips sent to him by his stockbrokers. All of the transactions are in the name of Roger B. Tilles. There is no indication that Mr. Tilles received any stock transfers from his family or any outside source.

Mr. Tilles' financial activity between March 20, 1978, and June 20, 1978, is outlined below:

^{1/} The bankers who issued the notes were contacted by the Office of General Counsel. They advised that only Tilles signed the notes (i.e. there were no co-signers or guarantors) and that the interest rates were the usual rates.

Net worth (3-20-78)	\$ 15,780	
Contributions from Tilles To His Campaign (3-20-78 Thru 6-20-78)		(\$10,258)
Profits from Stock Market (3-20-78 Thru 6-20-78)	6,190	
Bank Note - June 19, 1978	<u>12,325.34</u>	
	\$ 34,295.34	(\$10,258)

Approximate Net Worth (6-20-78) \$ 24,037.34

It appears that the documentation provided by Roger Tilles is consistent with his statements to the press in March and June, 1978, and there is no evidence that Mr. Tilles violated 2 U.S.C. §441f.

Recommendations

Find no reasonable cause to believe that Roger B. Tilles violated 2 U.S.C. §441f as alleged by Donald J. Albosta. Send attached letters. Close the file.

Date:

William C. Oydaker
General Counsel

Attachments:

1. Response letter from Mr. Tilles with attached documents
2. Proposed letter to Mr. Tilles
3. Proposed letter to complainant
4. Certification

ROGER TILLES

Democrat U.S. Congress

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt. Pleasant, MI. 48858

Phone (517) 772-0675
(517) 772-9287

August 12, 1978

Mr. William Oldaker
General Counsel
Federal Elections Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

Responding to your letter of August 4, 1978, I enclose the following information as to the sources of my personal finances:

1. I have received loans and reported such receipt to the Federal Elections Commission in the following amounts:

June 19, 1978	\$12,500.00
July 21, 1978	\$12,000.00
August 1, 1978	\$10,000.00

(all unsecured renewable notes from European - American Bank and Trust Co. - 925 Hempstead Turnpike, Franklin Square, New York 11010 - Mr. Walter Vander Waag - Assistant Vice President - (516) 683-5000)

July 10, 1978 \$10,000.00
(unsecured renewable note from Michigan National Bank, Lansing, Michigan - Mr. Robert West - Assistant Vice President)

These loans have increased my total liabilities from the March 20, 1978 statement by \$44,500.00. Copies of all loan statements are enclosed.

2. My stock transactions from March 20 to date are as follows:

(A) On April 6, I bought 2 LVI Oct 25 @ $3\frac{1}{2}$ approximately \$700.00.
On April 19, I sold 2 LVI Oct @ $5\frac{3}{4}$ approximately \$1150.00
(profit \$450.00)

(B) On April 19, I bought 9 IGL July 40 @ $1\frac{1}{4}$ approximately \$1125.00
On May 18, I sold 9 IGL July 40 @ $2\frac{1}{2}$ approximately \$2,250.00
(profit \$1,150.00)

(This transaction is not noted by receipt - Merrill, Lynch and I are currently in dispute on payment sale)

(C) On May 3, I bought 10 FNM July 15 @ $7/8$ and on May 8, I bought 30 FNM July 15 @ $3/4$ approximately \$3,062.50.
On May 18, I sold 40 FNM July 15 @ $1\frac{3}{4}$ approximately \$7,000.00
(profit \$3,937.50)

Authorized and paid for by the Roger Tilles for Congress Committee, 301 E. Broadway, Suite 212, Mt. Pleasant, MI 48858.
C. Small, Treasurer Ph: (517) 772-0675 and (517) 772-9287.

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.



ROGER TILLES

Democrat U.S. Congress

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt. Pleasant, MI. 48858

Phone (517) 772-0875
(517) 772-9287

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79010780951
- (D) On July 3, I sold 600 Genova Inc (previously held and listed on net worth statement @ 3 $\frac{1}{4}$ approximately \$1,950.00 (\$150.00 profit over worth of March 20)
 - (E) On May 22, I sold BRNS July 15 @ 2 approximately \$600.00 (Shares on which this occurred 300 Brunswick previously held and listed on net worth statement) approximately \$600.00 profit.
 - (F) On May 30, I received a \$52.50 dividend on the above mentioned Brunswick shares previously listed on net worth statement.
 - (G) On July 24, 1978, the BRNS July 15 expired.
 - (H) On July 24, 1978 I sold 300 shares of Brunswick at 15 approximately \$4,500.00 (same as net worth statement of March 20 shows)

Thus my total assets were increased from March 20 to date by stock purchase and sale by approximately \$6,340.00.

3. Virtually all cash from the March 20 statement has now been depleted plus all stock holdings and amounts receivable. I currently have approximately \$3,000.00 in cash, no stocks and bonds, no amounts receivable, approximately \$5,000.00 in furniture and a 1976 Olds Cutlass Salon worth approximately \$4,500.00. My present total assets therefore are approximately \$12,500.00.

4. With the inclusion of loans listed on page 1 along with the loans listed on the March 20 statement my present total liabilities are approximately \$56,500.00.

5. My present net worth now is approximately negative \$44,000.00 (a \$60,000.00 net loss from March 20).

I hope this explains to your satisfaction my spending and sources of revenue for the primary election of August 8, 1978.

Sincerely,

Roger Bruce Tilles

Certified Mail
Return Receipt Requested.

Authorized to be used by the Roger Tilles for Congress Committee 301 E. Broadway, Suite 212, Mt. Pleasant, MI 48858
C. Small, Treasurer Ph. (517) 772-0875 and (517) 772-9287

A copy of our report is filed with the Federal Election Commission and is available for purchase from the
Federal Election Commission, Washington, D.C.

PROMISSORY NOTE

DATE July 10, 1975 DUE July 10, 1980 PAY TO THE ORDER OF K N F

PAY TO THE ORDER OF **Michigan National Bank** **Lansing** MICHIGAN

FOR THE SUM OF **Ten Thousand and no/100** \$ **10,000.00**

ANNUAL PERCENTAGE RATE **10 3/4** % FINANCE CHARGE will be \$ **353.42** and the total

payments will be \$ **10,353.42** The undersigned shall have the right to prepay this obligation either in whole or in part at any time without penalty

Interest will be calculated on the basis of 360 days per year for the actual outstanding days. This note shall be secured by an

assignment of the right to receive the proceeds of the sale of the collateral described in the schedule of assets attached hereto.

Side of Agreement

Retention of collateral and grant of security interest by way of assignment and sale of the collateral

Holder upon defaulting itself insecure may without notice declare the unpaid balance to be immediately due and payable. The undersigned severally waive demand, notice

and protest and any defense of extension of time or other assurance by holder and to any substitution, exchange or release of collateral granted or permitted by the holder.

MAKES HEREBY ACKNOWLEDGE RECEIPT OF A FILLED OUT DUPLICATE ORIGINAL COPY OF THIS NOTE INCLUDING ALL DISCLOSURES HEREON.

Address **1604 N. Canterbury Trail**

Mt. Pleasant, MI. 48858

Signature X: *[Handwritten Signature]*

10/15 Rev. 7/77 Consumer Sample Interest Note

ORIGINAL

73040031931
29910081534

~~7991078755~~

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY		<input type="checkbox"/> BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO	VALUE DATE
				2761	5-19-78	000 C/L	6-19-78
NOTE NO	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGES	PROCEEDS	
00018	5-18-78	8.5	60	12,500.00	174.66	12,325.34	
DESCRIPTION:							

UNSECURED

ACCOUNT NUMBER 089 01 724 8

We have credited your account with the proceeds of the above notes!

ROGER TILPS
405 EAST HIGHWAY STREET
ST JOHNS, MICHIGAN NY 48879

AUTHORIZED SIGNATURE

djc

COMMERCIAL LOAN DEPARTMENT

KEEP THIS STATEMENT AS A RECORD FOR YOUR INCOME TAX.

1 5 6 0 8 0 0 1 0 6 2

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY		<input type="checkbox"/> BANKING CORPORATION		UNIT NUMBER 2761	DATE PREPARED 7-21-78	REFERENCE NO. OCC C/L	DATE 7-21-78
NOTE NO 00026	DUE DATE 8-18-78	RATE 8.5	DAYS 28	AMOUNT OF NOTE 12,000.00	INTEREST AND CHARGES 78.25	PROFIT 11,921.75	

DESCRIPTION

UNSECURED

8/1/78 - 8.5

5/18/78

10,000.00

650

270.

ACCOUNT NUMBER 089 017 248

We have credited your account with the amount of the above noted

ROGER TILLES
405 EAST HIGHAM STREET
ST. JOHNS, MICHIGAN 48679

COMMERCIAL LOAN DEPARTMENT

KEEP THIS STATEMENT AS A RECORD FOR YOUR INCOME TAX.

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY		<input type="checkbox"/> BANKING CORPORATION		UNIT NUMBER 2761	DATE PREPARED 6-19-78	REFERENCE NO. OCC G/L	DATE 6-19-78
NOTE NO 00018	DUE DATE 8-18-78	RATE 8.5	DAYS 60	AMOUNT OF NOTE 12,500.00	INTEREST AND CHARGES 174.66	PROFIT 12,325.34	

DESCRIPTION

UNSECURED

ACCOUNT NUMBER 039 01 726 8

ROGER TILLES
405 EAST HIGHAM STREET
ST. JOHNS, MICHIGAN 48679

Dear Customer,

Please return this note if you have not made payments for the amount of principal. Please call the office in charge of your account prior to maturity.

Thank you

COMMERCIAL LOAN DEPARTMENT

djs

1 1 6 0 8 0 0 0 0 2

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY	<input type="checkbox"/> BANKING CORPORATION	UNIT NUMBER 2761	DATE PREPARED 8-1-78	REFERENCE NO. OCC C/L	VALUE DATE 8-1-78	
NOTE NO.	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGES	PROCEEDS
	8-18-78	8.5	91	10,000.00	39.59	9,960.41

DESCRIPTION:

ACCOUNT NUMBER 089 017 24 8

We have credited your account with the proceeds of the above note(s).

ROGER TILLES
403 EAST HIGHAM STREET
ST. JOHNS, MICH.

AUTHORIZED SIGNATURE

nn/eg

COMMERCIAL LOAN DEPARTMENT

KEEP THIS STATEMENT AS A RECORD FOR YOUR INCOME TAX.

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY	<input type="checkbox"/> BANKING CORPORATION	UNIT NUMBER 2761	DATE PREPARED 7-22-78	REFERENCE NO. OCC C/L	VALUE DATE 7-21-78	
NOTE NO. 00024	DUE DATE 8-18-78	RATE 8.5	DAYS 28	AMOUNT OF NOTE 12,000.00	INTEREST AND CHARGES 78.25	PROCEEDS 11,921.75

DESCRIPTION:

UNSECURED

ACCOUNT NUMBER 089 017 24 8

Dear Customer:

Payment is due on your note. If you haven't made arrangements for payment or renewal, please call the office in charge of your account prior to maturity.

Thank you.

ROGER TILLES
403 EAST HIGHAM STREET
ST. JOHNS, MICHIGAN 48879

COMMERCIAL LOAN DEPARTMENT

1 1 6 0 8 0 0 0 0 2

GER TILLES

Democrat US Congress

Phone (517) 772-0875
(517) 772-9287

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt. Pleasant, MI. 48858

FINANCIAL STATEMENT AND NET WORTH
ROGER TILLES
March 20, 1978

ASSETS

Cash	\$12,182.24
Stocks & Bonds	
300 shares Brunswick	4,500.00
600 shares Genova, Inc.	1,300.00
Accounts receivable	900.00
Furniture	5,000.00
1976 Olds	
Outlast Salon	5,000.00
Total Assets	\$29,882.24

LIABILITIES

Notes payable from State Employees Credit Union	\$9,500.00
Secured Car Loan from State Employees Credit Union	3,000.00

TOTAL LIABILITIES

* 12.7% INTEREST

TOTAL

\$13,500.00
15,762.24

\$29,882.24

Authorized and paid for by the Roger Tilles for Congress Committee, 301 E. Broadway, Suite 212, Mt. Pleasant, MI 48858
C. Small, Treasurer. Ph. (517) 772-0875 and (517) 772-9287
A copy of this report is filed with the Federal Election Commission and is available for purchase from the
FEC, 1100 Pennsylvania Ave., N.W., Washington, D.C. 20543

**Merrill Lynch
Pierce Fenner & Smith Inc.**

OPEN ORDER CONFIRMATION

OFFICE AT Flint, Michigan DATE 10-6-78 ACCOUNT NO. 678-26497

WE CONFIRM THAT WE HAVE **Entered** OPEN ORDER(S) FOR YOUR ACCOUNT. PLEASE CHECK THE FOLLOWING ITEM(S) WITH YOUR RECORDS AND ADVISE US IMMEDIATELY IF THERE ARE ANY DISCREPANCIES.

TO BUY

2 LVI Oct. 25 @ 3/2 -open eustr.

MR ROGER B TILLES
405 E HIGHAM
ST JOHN MICH 48879

12-20-77H

TO SELL

IF THIS ORDER IS NOT EXECUTED
IT WILL AUTOMATICALLY BE
CANCELLED AT THE CLOSE OF
BUSINESS... OR AS
SOON THEREAFTER AS PRACTICABLE.

IMPORTANT - PLEASE READ CAREFULLY

THE INFORMATION CONTAINED HEREIN IS UNCLASSIFIED AND IS NOT TO BE RELEASED TO THE PUBLIC WITHOUT THE EXPRESS WRITTEN PERMISSION OF THE SECURITIES AND EXCHANGE COMMISSION. THIS INFORMATION IS NOT TO BE USED FOR ANY PURPOSE OTHER THAN THAT FOR WHICH IT WAS ORIGINALLY INTENDED. THE INFORMATION CONTAINED HEREIN IS NOT TO BE USED FOR ANY PURPOSE OTHER THAN THAT FOR WHICH IT WAS ORIGINALLY INTENDED. THE INFORMATION CONTAINED HEREIN IS NOT TO BE USED FOR ANY PURPOSE OTHER THAN THAT FOR WHICH IT WAS ORIGINALLY INTENDED.

1 BUY 2 SELL STOP 3 SELL STOP LIMIT
4 SELL 5 BUY STOP 6 BUY STOP LIMIT

**Merr. Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

TELEPHONE

WE CONFIRM THE FOLLOWING TRANSACTION
SUBJECT TO THE AGREEMENT ON
THE REVERSE SIDE HEREOF

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT. OR STATE TAX	POST REG FEE	CHARGE OR MARK-UP/DOWN	NET AMOUNT
67826497	41978	41978	C 6 5.750000	115000		04	4285	110711
YOU BOUGHT OR YOU SOLD								
SID	2	CALL LVI	025	LEVI STRAUSS	CO			
EXP 10-21-78 NOCC								
PACIFIC STOCK EXCHANGE								
LVI JE OCT 025								
CLOSING TRANSACTION								

MR ROGER B TILLES
405 E HIGHAM
ST JOHN MICH 48879

IF YOU HAVE MOVED
OR PLAN TO MOVE,
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS.

AT SEC
ZLVM1
6568 00000
PLEASE WRITE YOUR ACCOUNT NUMBER AND NAME ON THE
FACE OF YOUR CHECK WHEN MAKING A DEPOSIT
AND FORWARD TO THE OFFICE SERVING YOUR ACCOUNT

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE
EXCEPT WHERE SHOWN OTHERWISE. EXPLANATION
OFFER TO REVERSE SIDE HEREOF. ON SETTLEMENT DATE
PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES
ON OTHER THAN ROUND LOTS INDICATED BY TWO DASHES ON THE
LEFT AN AMOUNT OF 1/2% DEDUCTIBLE FROM THE PRICE OF THE
PRICE OF PURCHASE OR DEDUCTIBLE FROM THE PRICE OF THE
INCOME TAX BROKER'S FEE AS PROVIDED BY THE EXCHANGE
IN ALL OTHER CASES AN EXPLANATION WILL BE PROVIDED ON
REQUEST

CONF 704 TO PRINTED IN U.S.A.

CONF 704 TO PRINTED IN U.S.A.

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**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST

48502

313 767 6900



ACCOUNT NUMBER TRADE DATE

67826497 050878

PUR
PUR

30 CALL FNM 015
FEDL NTL MTGE ASSN

DESCRIPTION

AMOUNT DUE

DATE DUE IN

SECURITY

CURR NUMBER

PRICE

050878 2FOL1
050878

0

TOTAL DUE

242625

file personal

Red 2500

MR ROGER B TILLES
1604 CANTERBURY TR
MI PLEASANT MICH 48853

6568

IT IS ESSENTIAL THAT YOU CONSULT
THE DISCLOSURE STATEMENT AND
REGULATORY REQUIREMENTS FOR THE
REVERSE SIDE

IF YOU HAVE ALREADY PAID THIS AMOUNT
OR DEPOSITED THESE SECURITIES PLEASE DIS-
REGARD THIS NOTICE IF YOU HAVE ANY
QUESTIONS REGARDING THIS NOTICE PLEASE
CONTACT YOUR ACCOUNT EXECUTIVE IMMEDIATELY.

PLEASE WRITE YOUR ACCOUNT NUMBER ON AN ATTACHMENT TO THE
FACE OF YOUR CHECK, MONEY ORDER OR CASHIER'S CHECK
AND FORWARD TO THE OFFICE SERVICES ACCOUNT

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS



**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

48502

TE EPHONE
313-767-6900

ACCOUNT NUMBER TRADE DATE

67826497 41978

DATE DUE

PRICE

AMOUNT

INT OR STATE TAX

POST REG FEE

CHARGE OR
MARK-UP/DOWN

NET AMOUNT

67826497 41978 41978 C 2 1 250000

112500

8869

121369

NOT

CALL IGL 040

INTL MNRL CHEM PV5

EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE

IGL GH JUL 040
OPENING TRANSACTION

file personal

MR ROGER B TILLES
405 E HIGHAM
ST JOHN MICH 48879

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**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

TELEPHONE

48502 313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT. OR STATE TAX	POST REG FEE	CHARGE OR MARK-UP/DOWN	NET AMOUNT
67826497	50878	50878 C 3	.750000	225000			19500	244500

QUANTITY
YOU BOUGHT OR YOU SOLD
BOT 50

SECURITY DESCRIPTION
CALL FNM 015

FEDL NTL MTGE ASSN

EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE

FNM GC JUL 015
OPENING TRANSACTION

file personal file

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

ZFOL1
6568 00000

MERRILL LYNCH TRADES FOR ITS OWN ACCOUNT AS AN ODD LOT
ORDER. BILLS OF EXCHANGE AND OR AGREEMENTS AND AT THE
TIME OF YOUR TRANSACTION IT MAY HAVE HAD EITHER A LONG OR
SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN FOR
TRADE OR COMPLETELY HEDGED.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE
DATE DUE: AS INDICATED ABOVE. PAYMENT SHOULD BE MADE TO
MERRILL LYNCH PIERCE FENNER & SMITH INC. 400 WALL STREET
NEW YORK, N.Y. 10048.
PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES.
IF YOU HAVE ANY QUESTIONS OR DISPUTES CONCERNING THIS
CONFIRMATION, PLEASE CONTACT YOUR BROKER OR THE
FEDERAL RESERVE BOARD OF RESERVES, DEPARTMENT OF THE TREASURY,
WASHINGTON, D.C. 20540. IN ALL OTHER CASES AN EXPLANATION WILL BE FURNISHED ON REQUEST.

IF YOU HAVE MOVED
OR PLAN TO MOVE,
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

TELEPHONE

48502 313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT. OR STATE TAX	POST REG FEE	CHARGE OR MARK-UP/DOWN	NET AMOUNT
67826497	51878	51878 C 2	1.750000	700000		24	32608	667268

QUANTITY
YOU BOUGHT OR YOU SOLD
SOLD 10

SECURITY DESCRIPTION
CALL FNM 015

FEDL NTL MTGE ASSN

EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE

FNM GC JUL 015
CLOSING TRANSACTION

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

ZFOL1
6568 00000

MERRILL LYNCH TRADES FOR ITS OWN ACCOUNT AS AN ODD LOT
ORDER. BILLS OF EXCHANGE AND OR AGREEMENTS AND AT THE
TIME OF YOUR TRANSACTION IT MAY HAVE HAD EITHER A LONG OR
SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN FOR
TRADE OR COMPLETELY HEDGED.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE
DATE DUE: AS INDICATED ABOVE. PAYMENT SHOULD BE MADE TO
MERRILL LYNCH PIERCE FENNER & SMITH INC. 400 WALL STREET
NEW YORK, N.Y. 10048.
PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES.
IF YOU HAVE ANY QUESTIONS OR DISPUTES CONCERNING THIS
CONFIRMATION, PLEASE CONTACT YOUR BROKER OR THE
FEDERAL RESERVE BOARD OF RESERVES, DEPARTMENT OF THE TREASURY,
WASHINGTON, D.C. 20540. IN ALL OTHER CASES AN EXPLANATION WILL BE FURNISHED ON REQUEST.

IF YOU HAVE MOVED
OR PLAN TO MOVE,
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

personal file

01608011000

**FUND OF
SECURITY**

0-10

6568

PLEASE WRITE YOUR ACCOUNT NUMBER AND NAME ON THE
FACE OF YOUR CHECK MONETARY ORDER AND RETURN IT
AND FORWARD TO THE OFFICE SERVING YOUR POLICE.

YOU HAVE MOVED
 & PLAN TO MOVE.
 NOTIFY YOUR ACCOUNT
 EXECUTIVE OF YOUR
 NEW ADDRESS.

IT IS ESSENTIAL THAT YOU CONSULT THE "DESCRIPTIVE NOTES AND EDUCATORY REQUIREMENTS" ON THE REVERSE SIDE!

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF.

PAGER B-TILES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48858

32113 372434100
568 14759

PARMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON FOLLOWING DATE

THIS DOCUMENT IS NOT TO BE USED FOR ANY OTHER PURPOSES. IT IS NOT TO BE REPRODUCED OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM.

PLEASE PRESERVE THIS CONFIRMATION FOR YOUR TAX PURPOSES. IT IS THE POLICY OF THE SECURITIES AND EXCHANGE COMMISSION TO MAKE THIS CONFIRMATION AVAILABLE TO THE PUBLIC.

IN ALL OTHER CASES, AN EXPANSION OF THE

HERNIM LYNCH TRADED FOR ITS OWN ACCOUNT AS AN ODS LO
SHARIN BLOCH POSITION AND THE ANTI-BLOCH AND AT THE
SHORT POSITION IN THE SECURITY. HERNIM MAY HAVE BEEN FOR
FOR AN COMPLETE MESSAGE

IF YOU HAVE MOVED
OR PLAN TO MOVE,
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS.

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

LONG	SHORT	POSITION IN YOUR ACCOUNT	FX AS OF 04 27
9		CALL IGL 040 INTL MARL CHEM PV5 EXP 07-22-78 NOCC	1.6875

CAN YOU AFFORD TO BE WITHOUT THE MERRILL LYNCH MARKET LETTERS? TO START YOUR SUBSCRIPTION, USE THE ORDER FORM IN THE ENCLOSED FOLDER.

0500 *HA 2, 9, 14, 71, 89 2' 3' 4' 5' 6' 7' 8' 9' 10' 11' 12' 13' 14' 15' 16' 17' 18' 19' 20' 21' 22' 23' 24' 25' 26' 27' 28' 29' 30'*

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ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
PERIOD ENDING 05 26 1978		
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

file period

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
04 29			US FDS BALANCE APR 28		\$106.58
05 03	10		DEPOSIT 04/27		\$106.58CR
			CALL FNM 015		\$881.25
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.812500	
05 04			DEPOSIT 05/03		\$900.00CR
05 08	30		CALL FNM 015		\$2445.00
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.750000	
05 09			DEPOSIT		\$2500.00CR
05 18		40	CALL FNM 015		\$6673.68CR
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	1.750000	
			US FDS CLOSING BALANCE		\$6747.43CR

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 05 25
	9	CALL IGL 040	1.0000
		INTL MKRL CHEM PV5	
		EXP 07-22-78 NOCC	

PROFESSIONAL PORTFOLIO MANAGEMENT CAN HELP YOU OBTAIN THE RESULTS YOU WANT FROM YOUR PORTFOLIO. TO LEARN MORE, READ THIS MONTH'S STATEMENT ENCLOSURE.

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7 3 0 1 0 3 0 9 5

Statement of
Security Account

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
PERIOD ENDING 05 26 1978		
ACCOUNT EXECUTIVE NAME CRAIG. ROBERT H		

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

file - personal finance

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
05 03	10		US FDS BALANCE * APR 28		\$106.58
			CALL FNM 015		\$881.25
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.812500	
05 04			DEPOSIT 05/03		\$900.00CR
05 06			DEPOSIT 04/27		\$106.58CR
05 08	30		CALL FNM 015		\$2445.00
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.750000	
05 09			DEPOSIT		\$2500.00CR
05 18		40	CALL FNM 015		\$6573.68CR
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	1.750000	
			US FDS CLOSING BALANCE		\$6747.43CR

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 05 25
9		CALL IGL 040	1.0000
		INTL MHRL CHEM PV5	
		EXP 07-22-78 NOCC	

PROFESSIONAL PORTFOLIO MANAGEMENT CAN HELP YOU OBTAIN THE RESULTS YOU WANT FROM YOUR PORTFOLIO. TO LEARN MORE, READ THIS MONTH'S STATEMENT ENCLOSURE.

72041080933
72041080563

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
[REDACTED]		PERIOD ENDING 07 28 1978
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48858

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
07 11		600	GENOVA INC	3 1/4	\$1857.31CR
07 20			CHECK F		\$1857.31
07 21	50		GENOVA INC	JE	
			RCD		
			AS OF 02 06 78		
07 24		9	CALL IGL 040	EXPD	
			INTL MNRL CHEM PVS		
			EXP 07-22-78 NOCC		
07 24	100		GENOVA INC	RCD	
			US FDS CLOSING BALANCE		\$.00

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 07 27
	450	GENOVA INC	N/A

MERRILL LYNCH READY ASSETS TRUST CAN HELP YOU TAKE ADVANTAGE OF TODAY'S HIGH INTEREST RATES. ASK YOUR ACCOUNT EXECUTIVE FOR A FREE PROSPECTUS.

73010080951
73010080566

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7 3 0 1 0 1 8 1 5 6 7



MANLEY, BENNETT, McDONALD & CO.

100 RENAISSANCE CENTER, 25th FLOOR
DETROIT, MICHIGAN 48243

033

NON-NEGOTIABLE

CHECK NO.	ACCOUNT NUMBER	DATE	AMOUNT *
33	060682 22-72024-3-9	5/30/78	52.50

269

* PAYMENT FOR INCOME CREDITED TO YOUR TYPE 3 INCOME ACCOUNT FOR THE PRECEDING MONTH.
REFER TO YOUR MONTHLY STATEMENT FOR DETAILS

ROGER B. TILLES
OFFICE OF THE SPEAKER
STATE CAPITOL
LANSING

MI 48901

*file personal
finance*

MEMBER NEW YORK STOCK EXCHANGE
AND OTHER LEADING EXCHANGES



MANLEY, BENNETT, McDONALD & CO.
100 RENAISSANCE CENTER
25th FLOOR
DETROIT, MICHIGAN 48243

BLOOMFIELD HILLS • FLINT • GRAND RAPIDS
LANSING • OWOSSO • PLYMOUTH
SOUTHFIELD • TRAVERSE CITY • WARREN

YOU BOUGHT	YOU SOLD
	300

BRUNSWICK CORP
CALL ASSIGNED

PRICE	M	C
15	3	1

CU. 117043109000

file personal finance

106-1 S-07

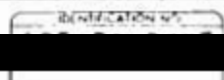
PRINCIPAL	INTEREST	COMMISSION	STATE TAX	SEC FEE	OTHER
450000		10626		15	

NET AMOUNT
439359

TRADE DATE	SETTLEMENT DATE	PROFESS DATE
072478	072878	0724 G

ROGER B TILLES
OFFICE OF THE SPEAKER,
STATE CAPITOL
LANSING

MI 48901



IDENTIFICATION NO.	SECURITY	BY
2272024-2-1	204	

SECURITY NO.	PROFESS DATE
8677841	00074 761

27

FOR THE ACCOUNT OF

ON OTHER THAN ROUND LOTS, NORMALLY 100
SHARES, AN AMOUNT MAY HAVE BEEN ADDED
TO THE PRICE ON PURCHASES OR DEDUCTED ON
SALES, DEPENDING UPON WHICH EXCHANGE
THE TRADE WAS EXECUTED. IN ALL CASES AN
EXPLANATION WILL BE PROVIDED ON REQUEST.

SUBJECT TO CONDITIONS ON REVERSE SIDE

CONFIRMATION AND STATEMENT PLEASE NOTIFY US IMMEDIATELY OF ANY ERROR OR OMISSION

MEMBER NEW YORK STOCK EXCHANGE
AND OTHER LEADING EXCHANGES



MANLEY, BENNETT, McDONALD & CO.
100 RENAISSANCE CENTER
25th FLOOR
DETROIT, MICHIGAN 48243

BLOOMFIELD HILLS • FLINT • GRAND RAPIDS
LANSING • OWOSSO • PLYMOUTH
SOUTHFIELD • TRAVERSE CITY • WARREN

YOU BOUGHT	YOU SOLD
	3

CALL BRUNSWICK JUL 15 CBUE
EXP 07/22/1978
OPENING POS

PRICE	M	C
2	5	1

CU. 117043966039

file personal finance

107-1 S-07

PRINCIPAL	INTEREST	COMMISSION	STATE TAX	SEC FEE	OTHER
55840		4158		02	

NET AMOUNT
55840

TRADE DATE	SETTLEMENT DATE	PROFESS DATE
052278	052378	0522 T

ROGER B TILLES
OFFICE OF THE SPEAKER
STATE CAPITOL
LANSING

MI 48901



IDENTIFICATION NO.	SECURITY	BY
2272024-3-4	204	

SECURITY NO.	PROFESS DATE
9507259	00227 761

28

FOR THE ACCOUNT OF

ON OTHER THAN ROUND LOTS, NORMALLY 100
SHARES, AN AMOUNT MAY HAVE BEEN ADDED
TO THE PRICE ON PURCHASES OR DEDUCTED ON
SALES, DEPENDING UPON WHICH EXCHANGE
THE TRADE WAS EXECUTED. IN ALL CASES AN
EXPLANATION WILL BE PROVIDED ON REQUEST.

SUBJECT TO CONDITIONS ON REVERSE SIDE

CONFIRMATION AND STATEMENT PLEASE NOTIFY US IMMEDIATELY OF ANY ERROR OR OMISSION

89508001002
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FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, Michigan 48655

RE: MUR 640

Dear Mr. Albosta:

On , 1978, the Commission determined there was no reasonable cause to believe that the allegations you made indicated a violation of the Federal Election Campaign Act of 1971, as amended. Accordingly, the Commission intends to close its file in this matter.

If further information comes to your attention which you believe establishes a violation of the Act, please contact me.

Sincerely,

William C. Oldaker
General Counsel

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FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles
1604 H Canterbury Lane
Mt. Pleasant, Michigan 48858

Re: MUR 640

Dear Mr. Tilles:

On , 1978, the Commission determined there was no reasonable cause to believe that you violated 2 U.S.C. §441f in connection with the above captioned matter. Accordingly, the Commission intends to close its file.

Thank you for your cooperation.

Sincerely,

William C. Oldaker
General Counsel

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ROGER TILLES

Democrat U.S. Congress

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt Pleasant, MI. 48858

Phone (517) 772-0875
(517) 772-9287

August 12, 1978

Mr. William Oldaker
General Counsel
Federal Elections Commission
1325 K Street N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

Responding to your letter of August 4, 1978, I enclose the following information as to the sources of my personal finances:

1. I have received loans and reported such receipt to the Federal Elections Commission in the following amounts:

June 19, 1978	\$12,500.00
July 21, 1978	\$12,000.00
August 1, 1978	\$10,000.00

(all unsecured renewable notes from European - American Bank and Trust Co. - 925 Hempstead Turnpike, Franklin Square, New York 11010 - Mr. Walter Vander Waag - Assistant Vice President - (516) 683-5000)

July 10, 1978 \$10,000.00

(unsecured renewable note from Michigan National Bank, Lansing, Michigan - Mr. Robert West - Assistant Vice President)

These loans have increased my total liabilities from the March 20, 1978 statement by \$44,500.00. Copies of all loan statements are enclosed.

2. My stock transactions from March 20 to date are as follows:

(A) On April 6, I bought 2 LVI Oct 25 @ $3\frac{1}{2}$ approximately \$700.00.
On April 19, I sold 2 LVI Oct @ $5\frac{3}{4}$ approximately \$1150.00
(profit \$450.00)

(B) On April 19, I bought 9 IGL July 40 @ $1\frac{1}{2}$ approximately \$1125.00
On May 18, I sold 9 IGL July 40 @ $2\frac{1}{2}$ approximately \$2,250.00
(profit \$1,150.00)

(This transaction is not noted by receipt - Merrill, Lynch and I are currently in dispute on payment sale)

(C) On May 3, I bought 10 FNM July 15 @ $7/8$ and on May 8, I bought 30 FNM July 15 @ $3/4$ approximately \$3,062.50.
On May 18, I sold 40 FNM July 15 @ $1\frac{3}{4}$ approximately \$7,000.00
(profit \$3,937.50)

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- (D) On July 3, I sold 600 Genova Inc (previously held and listed on net worth statement @ 3 $\frac{1}{2}$ approximately \$1,950.00 (\$150.00 profit over worth of March 20)
- (E) On May 22, I sold BRNS July 15 @ 2 approximately \$600.00 (Shares on which this occurred 300 Brunswick previously held and listed on net worth statement) approximately \$600.00 profit.
- (F) On May 30, I received a \$52.50 dividend on the above mentioned Brunswick shares previously listed on net worth statement.
- (G) On July 24, 1978, the BRNS July 15 expired.
- (H) On July 24, 1978 I sold 300 shares of Brunswick at 15 approximately \$4,500.00 (same as net worth statement of March 20 shows)

Thus my total assets were increased from March 20 to date by stock purchase and sale by approximately \$6,340.00.

3. Virtually all cash from the March 20 statement has now been depleted plus all stock holdings and amounts receivable. I currently have approximately \$3,000.00 in cash, no stocks and bonds, no amounts receivable, approximately \$5,000.00 in furniture and a 1976 Olds Cutlass Salon worth approximately \$4,500.00. My present total assets therefore are approximately \$12,500.00.

4. With the inclusion of loans listed on page 1 along with the loans listed on the March 20 statement my present total liabilities are approximately \$56,500.00.

5. My present net worth now is approximately negative \$44,000.00 (a \$60,000.00 net loss from March 20).

I hope this explains to your satisfaction my spending and sources of revenue for the primary election of August 8, 1978.

Sincerely,

Roger Bruce Tilles

Certified Mail
Return Receipt Requested.

PROMISSORY NOTE

PAID TO THE ORDER OF **Michigan National Bank**

MICHIGAN

ANNUAL PERCENTAGE RATE

10.75%

DATE

10/1/78

23.42

AMOUNT \$10,000.00

10,000.00

THIS NOTE IS ISSUED WITHOUT RESERVATION OF TITLE OR INTEREST IN ANY PROPERTY OR INTEREST IN ANY BUSINESS OR VESSEL OR OTHER ASSET OF THE ISSUER. THE UNDERSIGNED HEREBY WAIVE DEMAND, NOTICE AND PROTEST, ANY DEFENSE OF EXEMPTION AT TIME OR OTHERWISE, AND BY ACCEPTING THIS NOTE, THE UNDERSIGNED HEREBY ACKNOWLEDGE RECEIPT OF A FILLED OUT DUPLICATE ORIGINAL COPY OF THIS NOTE, INCLUDING ALL DISCLOSURES HEREON.

1604 N Canterbury Trail
Mt. Pleasant, MI. 48858

Signature: *[Handwritten Signature]*

ORIGINAL

1978-10-01

EAB European American Bank

BANK & TRUST COMPANY		BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO.	VALUE DATE
				2741	6-19-78	CCC C/L	6-19-78
NOTE NO.	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGES		PROCEEDS
0008	8-18-78	8.5	60	12,500.00	174.66		12,325.34
DESCRIPTION							

UNSECURED

ROGER TILPS
405 EAST HIGHAM STREET
ST JOHNS, MICHIGAN NY 48879

၂၅၆

- KEEP THIS STATEMENT AS A RECORD FOR YOUR INCOME TAX.

We have studied $\alpha = 1, 2, \dots, 10$ in the present case of the above model.

COMMERCIAL LOAN DEPARTMENT

EAB European American Bank

BANK & TRUST COMPANY		BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO.	DATE DUE
				2761	7-21-78	OCC C/L	7-21-78
NET NO	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGE	TOTAL DUE	
00026	8-18-78	8.5	28	12,000.00	78.25	11,921.75	
UNSECURED						650	
5/1/78 - 3.5						270.	
5/18/78							

ROGER TILLES
403 EAST HIGHAM STREET
ST. JOHNS, MICHIGAN 48679

089 017 248

COMMERCIAL LOAN DEPARTMENT

EAB European American Bank

BANK & TRUST COMPANY		BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO.	DATE DUE
				2761	6-15-78	OCC C/L	6-15-78
NET NO	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGE	TOTAL DUE	
00018	8-18-78	8.5	60	12,500.00	174.66	12,325.34	

UNSECURED

ROGER TILES
403 EAST HIGHAM STREET
ST JOHNS, MICHIGAN NY 48679

ACCOUNT NUMBER 089 01 724 8

Dear Customer

Please make your payments to the office in charge of your account prior to maturity.

COMMERCIAL LOAN DEPARTMENT

dje

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY		<input type="checkbox"/> BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO.	VALUE DATE
				2761	8-1-78	OCC C/L	8-1-78
NOTE NO.	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGES	PROCEEDS	
	8-18-78	8.5	91	10,000.00	39.59	9,960.41	

DESCRIPTION

ACCOUNT NUMBER 089 017 24.8

We have credited your account with the proceeds of this note.

ROGER TILLES
405 EAST HIGHAM STREET
ST. JOHNS, MICH.

mm/eg

COMMERCIAL LOAN DEPARTMENT

EAB European American Bank

<input type="checkbox"/> BANK & TRUST COMPANY		<input type="checkbox"/> BANKING CORPORATION		UNIT NUMBER	DATE PREPARED	REFERENCE NO.	VALUE DATE
				2761	7-22-78	OCC C/L	7 21-76
NOTE NO.	DUE DATE	RATE	DAYS	AMOUNT OF NOTE	INTEREST AND CHARGES	PROCEEDS	
00000	8-18-78	8.5	28	12,000.00	78.25	11,921.75	

DESCRIPTION

UNSECURED

ACCOUNT NUMBER 089 017 248

Dear Customer,

Payment is due on your note. If you haven't made arrangements for payment or renewal, please call the office in charge of your account prior to maturity.

Thank you

ROGER TILLES
405 EAST HIGHAM STREET
ST. JOHNS, MICHIGAN 48879

mm

COMMERCIAL LOAN DEPARTMENT

ROGER TILLES

Democrat U.S. Congress

Roger Tilles for Congress Committee
301 E. Broadway, Suite 212
Mt. Pleasant, MI. 48858

Phone (517) 772-0875
(517) 772-9287

FINANCIAL STATEMENT OF ASSETS AND LIABILITIES FOR THE YEAR ENDING 12/31/80, 1980

ASSETS

Cash \$12,142.24
Stocks & Bonds
300 shares \$4,500.00
Warwick
500 shares
Genova, Inc. 1,300.00
Accounts Receivable 500.00
Furniture 5,000.00
1976 Oldsmobile
Citrus Salon 5,000.00

Total Assets \$29,002.24

LIABILITIES

Notes Payable from
State Employees
Association \$2,500.00
Secured Car Loan
from State
Employees Assoc. 5,000.00

TOTAL LIABILITIES \$13,500.00

NET ASSETS \$15,750.24

TOTAL \$29,002.24

**Merrill Lynch
Pierce Fenner & Smith Inc.**

OPEN ORDER CONFIRMATION

OFFICE AT Flint, Michigan DATE 4-6 ACCOUNT NO 678-26497

WE CONFIRM THAT WE HAVE **Entered** OPEN ORDER(S) FOR YOUR ACCOUNT. PLEASE CHECK THE FOLLOWING ITEM(S) WITH YOUR RECORDS AND ADVISE US IMMEDIATELY IF THERE ARE ANY DISCREPANCIES.

TO BUY

2 LVI Oct. 25 @ 3 1/2 -open eustr.

6568

678 26497

MR ROGER B TILLES
405 E HIGHAM
ST JOHN MICH 48879

12-20-77h

TO SELL

IF THIS ORDER IS NOT EXECUTED
IT WILL AUTOMATICALLY BE
CANCELLED AT THE CLOSE OF
BUSINESS... OR AS
SOON THEREAFTER AS PRACTICABLE.

IMPORTANT: PLEASE READ CAREFULLY

BUY 1 2 SELL STOP 3 SELL STOP LIMIT
SELL 4 5 BUY STOP 6 BUY STOP LIMIT

**Merr. Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI
PRICE

67325197 41978 41978 C 6 5.750000
SECURITY DESCRIPTION

SLD 2 CALL LVI 025

EXP 10-21-78 NOCC
PACIFIC STOCK EXCHANGE

48502

AMOUNT

115000

LEVI STRAUSS CO

TELEPHONE

213-767-6900

POST REG III

04

LVI JE OCT 025
CLOSING TRANSACTION

CHARGE OR
MARK UP/DOWN

4285

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF.

110711

MR ROGER B TILLES
405 E HIGHAM
ST JOHN MICH 48879

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

AL SEC ZLVM1
6568 TRADE FOR 100000 AS AN ODD LOT
ORDER. NOTICE POSITIONER AND OR AMTRAILOR AND AT THE
WE UP YOUR TRANSACTION IT MAY HAVE HAD A LONG OR
SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN FOR
FULLY OR PARTIALLY RECORDED
PLEASE ADVISE YOUR FUTURE NUMBER THROUGH THE
FUTURE NUMBER WHICH MAY BE UNDER OR UNDER UNRECORDED
AND FORWARDED TO THE OFFICE OF YOUR ACCOUNT

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE
DATE DUE AS INDICATED ABOVE FOR SYMBOLS: (1) ONLY ON
PREFER TO RETURN A DE RECEIPT DELIVERY ON OR BEFORE SET
PLEASANT DATE WILL ALSO PREMIUM CHARGES
PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES
ON OTHER THAN ROUND LOT (NORMAL) TOO CHARGE ON THE
SYMBOL AS AMOUNT OF 12% CENTS PER SHARE IS ADDED TO THE
PRICE OF PURCHASES OR DEDUCTED FROM SALES AT THE 1%
INCOME TAX BROKER AS PROVIDED BY THE SEC. OF THE EXCHANGE
IN ALL OTHER CASES AN EXPLANATION WILL BE FURNISHED ON
REQUEST

1000-70-20 PRINTED IN U.S.A.

1000-70-20 PRINTED IN U.S.A.

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Merrill Lynch 444 CHURCH ST 313 767 6900
Pierce Fenner & Smith Inc FLINT MI 48502

**FUNDS OR
SECURITIES DUE**

67826497 050878

PIR 10 CALL FNM 015 050878 ZFOL1
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*file
personal*

TOTAL DUE 242625

MR ROGER B TILLES
1604 CANTERBURY TR
MI PLEASANT MICH 48858

6568

IT IS ESSENTIAL THAT YOU CONSULT
THE "DESCRIPTIVE NOTES AND REG-
ULATORY REQUIREMENTS" ON THE
REVERSE SIDE.

led 2500

IF YOU HAVE ALREADY PAID THE FULL PRICE
OR DEPOSITED THESE FUNDS, PLEASE ADVISE
REGARD THIS NOTICE. IF YOU HAVE ANY
QUESTIONS REGARDING THIS NOTICE, PLEASE
CONTACT YOUR ACCOUNT MANAGER IMMEDIATELY.

IF YOU HAVE MOVED
OR PLAN TO MOVE,
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS.

Merrill Lynch 444 CHURCH ST
Pierce Fenner & Smith Inc. FLINT MI

67826497 41978 41978 012 1 250000

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INT OR STATE TAX
CHARGE OR
MARK UP/DOWN

TE EPHONE
313-767-6900

WE CONTACT THE FOLLOWING BANKING
INstitutions TO VERIFY THE ACCOUNTS
AND BALANCES.

80T 9 CALL IGL 010

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ENP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE

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OPENING TRANSACTION

*file
personal
finance*

MR ROGER B TILLES
105 E HIGHAM
ST JOHN MICH 48879

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IF YOU HAVE MOVED OR PLAN TO MOVE,
NOTIFY YOUR ACCOUNT EXECUTIVE OF YOUR
NEW ADDRESS.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECUR-
ITIES SOLD ARE DUE ON SETTLEMENT DATE.
IF DATE DUE IS INDICATED ABOVE, FOR THREE (3) DAYS AFTER
SETTLEMENT DATE, YOU WILL BE RESPONSIBLE FOR PAYING THE
SETTLEMENT DATE WILL AVOID ANY PENALTY CHARGES.
PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES.
IN OTHER CASES, NO SET DATE, YOU WILL BE RESPONSIBLE FOR
PAYING THE FULL AMOUNT OF THE PURCHASE OR DEPOSIT OF THE
FULL AMOUNT OF THE PURCHASE OR DEPOSIT OF THE FULL AMOUNT
IN ALL OTHER CASES, AN EXPLANATION WILL BE PROVIDED ON
REQUEST.

CODE 7000 REV 11-77 PRINTED IN U.S.A.

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**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST.
FLINT MI

48502 TELEPHONE
313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT. OR STATE TAX	POST REG. FEE	CHARGE OR MARK UP/DOWN	NET AMOUNT
67826497	50878	50878	C 3	750000	225000		19500	244500

BOT 30 CALL FNM 015
EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE
FEDL NTL MTGE ASSN
FNM GC JUL 015
OPENING TRANSACTION

Personal Finance

MR ROGER R TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48958

ZFOL1
6568 00000

WE HAVE OPENED AN ACCOUNT FOR YOU IN THE NAME OF MR ROGER R TILLES AND AT THE TIME OF YOUR TRANSACTION IT MAY HAVE HAD EITHER A LONG OR SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN PAR-
TIAL OR COMPLETELY HEDGED
IF YOU WISH TO KNOW THE DETAILS OF YOUR TRANSACTION OR THE ACCOUNT PLEASE CONTACT YOUR BROKER OR CORRESPONDENT
AND FORWARD TO THE STREET ADDRESS OF YOUR ACCOUNT

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE
IF YOU HAVE NOT RECEIVED YOUR SECURITIES BY THE SETTLEMENT DATE PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES
UNLESS YOU HAVE BEEN ADVISED OTHERWISE BY YOUR BROKER OR CORRESPONDENT
IF YOU HAVE BEEN ADVISED OTHERWISE BY YOUR BROKER OR CORRESPONDENT
IN ALL OTHER CASES AN EXPLANATION WILL BE FURNISHED UPON REQUEST

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

CONFIRMATION 11 77 PRINTED IN U.S.A.

**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

48502 TELEPHONE
313-767-6900

WE CONFIRM THE FOLLOWING TRANSACTION SUBJECT TO THE AGREEMENT ON THE REVERSE SIDE HEREOF

ACCOUNT NUMBER	TRADE DATE	DATE DUE	PRICE	AMOUNT	INT. OR STATE TAX	POST REG. FEE	CHARGE OR MARK UP/DOWN	NET AMOUNT
67826497	51878	51878	C 2	1.750000	700000	24	32608	667268

SLD 10 CALL FNM 015
EXP 07-22-78 NOCC
CHICAGO BOARD OPTIONS EXCHANGE
FEDL NTL MTGE ASSN
FNM GC JUL 015
CLOSING TRANSACTION

MR ROGER R TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48958

ZFOL1
6568 00000

WE HAVE OPENED AN ACCOUNT FOR YOU IN THE NAME OF MR ROGER R TILLES AND AT THE TIME OF YOUR TRANSACTION IT MAY HAVE HAD EITHER A LONG OR SHORT POSITION IN THIS SECURITY WHICH MAY HAVE BEEN PAR-
TIAL OR COMPLETELY HEDGED
IF YOU WISH TO KNOW THE DETAILS OF YOUR TRANSACTION OR THE ACCOUNT PLEASE CONTACT YOUR BROKER OR CORRESPONDENT
AND FORWARD TO THE STREET ADDRESS OF YOUR ACCOUNT

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECURITIES SOLD ARE DUE ON SETTLEMENT DATE
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UNLESS YOU HAVE BEEN ADVISED OTHERWISE BY YOUR BROKER OR CORRESPONDENT
IF YOU HAVE BEEN ADVISED OTHERWISE BY YOUR BROKER OR CORRESPONDENT
IN ALL OTHER CASES AN EXPLANATION WILL BE FURNISHED UPON REQUEST

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

Personal Finance

CONFIRMATION 11 77 PRINTED IN U.S.A.



**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

48502

ACCOUNT NUMBER TRADE DATE

57826497 070378

SLE 600 GENOVA INC

DESCRIPTION

AMOUNT

071178 32113

CURR. VAL.

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ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48858

6568

IT IS ESSENTIAL THAT YOU CONSULT
THE "DESCRIPTIVE NOTES AND REG-
ULATORY REQUIREMENTS" ON THE
REVERSE SIDE.

IF YOU HAVE ALREADY PAID THE AMOUNT
OR DEPOSITED THESE SECURITIES PLEASE DIS-
REGARD THIS NOTICE IF YOU HAVE ANY
QUESTIONS REGARDING THIS NOTICE PLEASE
CONTACT YOUR ACCOUNT EXECUTIVE IMMEDIATELY.

PLEASE WRITE YOUR ADDRESS AND ALL INFORMATION TO THE
FACE OF YOUR CHECK. MONEY ORDER OR CASHIER'S CHECK
AND FORWARD TO THE OFFICE OF THE CUSTODIAN.

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS



**Merrill Lynch
Pierce Fenner & Smith Inc.**

444 CHURCH ST
FLINT MI

48502

TELEPHONE
313-767-6900

WE CONFIRM THE FOLLOWING TRANSAC-
TION IS SUBJECT TO THE AGREEMENT ON
THE REVERSE SIDE HEREOF.

DATE DATE PRICE
070378 071178 1 3 1/4
SECURITY DESCRIPTION
GENOVA INC

AMOUNT
195000

INT OR STATE TAX

POST BKG FEE

40

CHARGE OR
MARK-UP/DOWN
9229

NET AMOUNT

195731

ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48858

22113 3212434100
568 14759

MERRILL LYNCH TRADER FOR ITS OWN ACCOUNT AS AN ODD LOT
DEALER, UNDER POSITIONER AND/OR ARBITRAGEUR AND AT THE
TIME OF YOUR TRANSACTION, IT MAY HAVE HAD EITHER A LONG OR
SHORT POSITION IN THIS SECURITY, WHICH MAY HAVE BEEN FOR
TRADING OR COMPLETELY MISSED.

PLEASE WRITE YOUR ADDRESS AND ALL INFORMATION TO THE
FACE OF YOUR CHECK, MONEY ORDER OR CASHIER'S CHECK
AND FORWARD TO THE OFFICE OF THE CUSTODIAN.

PAYMENT FOR SECURITIES PURCHASED AND DELIVERY OF SECUR-
ITIES SOLD ARE DUE ON SETTLEMENT DATE.
DATE DUE: AS INDICATED ABOVE FOR SYMBOL. EXPLANATION
REFR TO REVERSE SIDE HEREOF. DELIVERY ON OR BEFORE SET-
TLEMENT DATE WILL AVOID PREMIUM CHARGES.
PLEASE PRESERVE THIS CONFIRMATION FOR INCOME TAX PURPOSES.
ON OTHER THAN ROUND LOTS (EVENLY 100 SHARES OR
OVER) AN AMOUNT OF 12% CENTS PER SHARE (ADDED TO THE
PRICE OF PURCHASES OR DEDUCTED FROM SALES BY THE CUSTODIAN)
WILL BE DEDUCTED FROM THE PURCHASE PRICE OR ADDED TO THE
SALES PRICE AS PROVIDED BY THE RULES OF THE STOCK EXCHANGE.
IN ALL OTHER CASES AN EXPLANATION AND REQUEST

IF YOU HAVE MOVED
OR PLAN TO MOVE
NOTIFY YOUR ACCOUNT
EXECUTIVE OF YOUR
NEW ADDRESS

CODE 7700 REV 11 77 PRINTED IN U.S.A.

ACCOUNT # 678 25497	A/E # 6568	PAGE # 1
[REDACTED]		PERIOD ENDING 05 26 1978
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

MR. ROGER B. TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

filed

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
04 29			US FDS BALANCE APR 28		\$106.58
05 03	10		DEPOSIT 04/27		\$106.58CR
			CALL FNM 015		\$881.25
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
05 04			FNM GC JUL 015	.812500	
05 08	30		DEPOSIT 05/03		\$900.00CR
			CALL FNM 015		\$2445.00
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
05 09			FNM GC JUL 015	.750000	
05 18		40	DEPOSIT		\$2500.00CR
			CALL FNM 015		\$6673.68CR
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	1.750000	
			US FDS CLOSING BALANCE		\$6747.43CR

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 05 25
9		CALL IGL 040	1.0000
		INTL MNRL CHEM PVS	
		EXP 07-22-78 NOCC	

PROFESSIONAL PORTFOLIO MANAGEMENT CAN HELP YOU OBTAIN THE RESULTS YOU WANT FROM YOUR PORTFOLIO. TO LEARN MORE, READ THIS MONTH'S STATEMENT ENCLOSURE.

78049031500

0060801000

Statement of
Security Account

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
PERIOD ENDING 05 26 1978		
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

MR ROGER B TILLES
1604 CANTERBURY TR
MT PLEASANT MICH 48858

file - personal finance

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
05 03	10		US FDS BALANCE APR 28		\$106.58
			CALL FNM 015		\$881.25
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.812500	
05 04			DEPOSIT 05/03		\$900.00CR
05 06			DEPOSIT 04/27		\$106.58CR
05 08	30		CALL FNM 015		\$2445.00
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	.750000	
05 09			DEPOSIT		\$2500.00CR
05 18		40	CALL FNM 015		\$6673.68CR
			FEDL NTL MTGE ASSN		
			EXP 07-22-78 NOCC		
			FNM GC JUL 015	1.750000	
			US FDS CLOSING BALANCE		\$6747.43CR

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 05 25
9		CALL ICL 040	1.0000
		INTL MTRL CHEM PV5	
		EXP 07-22-78 NOCC	

PROFESSIONAL PORTFOLIO MANAGEMENT CAN HELP YOU OBTAIN THE RESULTS YOU WANT FROM YOUR PORTFOLIO. TO LEARN MORE, READ THIS MONTH'S STATEMENT ENCLOSURE.

7 3 0 1 1 1 0 3

ACCOUNT # 678 26497	A/E # 6568	PAGE # 1
PERIOD ENDING 07 28 1978		
ACCOUNT EXECUTIVE NAME CRAIG, ROBERT H		

ROGER B TILLES
1604 H CANTERBURY TRAIL
MT PLEASANT MICH 48858

DATE	BOT/RECD	SOLD/DELD	DESCRIPTION	PRICE	AMOUNT
07 11		600	GENOVA INC	3 1/4	\$1857.31CR
07 20			CHECK F		\$1857.31
07 21	50		GENOVA INC	JE	
			RCD		
07 24		9	AS OF 02 06 78		
			CALL IGL 040	EXPD	
			INTL MNRL CHEM PV5		
07 24	100		EXP 07-22-78 NOCC		
			GENOVA INC	RCD	
			US FDS CLOSING BALANCE		\$.00

LONG	SHORT	POSITION IN YOUR ACCOUNT	PX AS OF 07 27
		450 GENOVA INC	N/A

MERRILL LYNCH READY ASSETS TRUST CAN HELP YOU TAKE ADVANTAGE OF TODAY'S HIGH INTEREST RATES. ASK YOUR ACCOUNT EXECUTIVE FOR A FREE PROSPECTUS.

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32

2 2 2 1 0 2 8 7 9 3 1



MANLEY, BENNETT, McDONALD & CO.
100 RENAISSANCE CENTER 25th FLOOR
DETROIT MICHIGAN 48243

033

NON-NEGOTIABLE

CHCK NO.	ACCOUNT NUMBER	DATE	AMOUNT
33 060682	22-72024-3-9	5/30/78	22.50

* PAYMENT FOR INCOME CREDITED TO YOUR TYPE 3 INCOME ACCOUNT FOR THE PRECEDING MONTH
REFER TO YOUR MONTHLY STATEMENT FOR DETAILS

ROGER R. TILLES
OFFICE OF THE SPEAKER
STATE CAPITOL
LANSING

MI 48901

*file personal
finance*

8811 - HARDY FORMS CORP.

MEMBER NEW YORK STOCK EXCHANGE
AND OTHER LEADING EXCHANGES



MANLEY, BENNETT, McDONALD & CO.

100 RENAISSANCE CENTER
25th FLOOR
DETROIT, MICHIGAN 48243

BLOOMFIELD HILLS • FLINT • GRAND RAPIDS
LANSING • OWOSSO • PLYMOUTH
SOUTHFIELD • TRAVERSE CITY • WARREN

YOU BOUGHT	YOU SOLD		PRICE	M	C
	300	BRUNSWICK CORP CALL ASSIGNED	15	3	1

file personal finance

CU. 117043109000

186-1 S-07

PRINCIPAL	INTEREST	COMMISSION	STATE TAX	SEC FEE	OTHER	NET AMOUNT	TRADE DATE	SETTLEMENT DATE	PROCESS DATE
450000		10626		15		439359	072478	072878	0724

ROGER B TILLES
OFFICE OF THE SPEAKER,
STATE CAPITOL
LANSING

MI 48901

2272024-2-1

204

B677841

00074

761

27

FOR THE ACCOUNT OF

ON OTHER THAN ROUND LOTS, NORMALLY 100
SHARES, AN AMOUNT MAY HAVE BEEN ADDED
TO THE PRICE ON PURCHASES OR DEDUCTED ON
SALES, DEPENDING UPON WHICH EXCHANGE
THE TRADE WAS EXECUTED. IN ALL CASES AN
EXPLANATION WILL BE PROVIDED ON REQUEST.

SUBJECT TO CONDITIONS ON REVERSE SIDE

PLEASE NOTIFY US IMMEDIATELY OF ANY ERROR OR OMISSION

MEMBER NEW YORK STOCK EXCHANGE
AND OTHER LEADING EXCHANGES



MANLEY, BENNETT, McDONALD & CO.

100 RENAISSANCE CENTER
25th FLOOR
DETROIT, MICHIGAN 48243

BLOOMFIELD HILLS • FLINT • GRAND RAPIDS
LANSING • OWOSSO • PLYMOUTH
SOUTHFIELD • TRAVERSE CITY • WARREN

YOU BOUGHT	YOU SOLD		PRICE	M	C
	3	CALL PRO SHICK EXP 07/22/1978 OPENING POS	2	5	1

file personal finance

CU. 11704396039

187-1 S-07

PRINCIPAL	INTEREST	COMMISSION	STATE TAX	SEC FEE	OTHER	NET AMOUNT	TRADE DATE	SETTLEMENT DATE	PROCESS DATE
55840		4150		02		55840	052278	052378	0522

ROGER B TILLES
OFFICE OF THE SPEAKER,
STATE CAPITOL
LANSING

MI 48901

2272024-3-4

204

9507259

00227

761

27

FOR THE ACCOUNT OF

ON OTHER THAN ROUND LOTS, NORMALLY 100
SHARES, AN AMOUNT MAY HAVE BEEN ADDED
TO THE PRICE ON PURCHASES OR DEDUCTED ON
SALES, DEPENDING UPON WHICH EXCHANGE
THE TRADE WAS EXECUTED. IN ALL CASES AN
EXPLANATION WILL BE PROVIDED ON REQUEST.

SUBJECT TO CONDITIONS ON REVERSE SIDE

PLEASE NOTIFY US IMMEDIATELY OF ANY ERROR OR OMISSION

7801008098

Mr. Wm. Oldaker
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, D.C.

20463



'78 AUG 15 AM 11:09

FEDERAL ELECTION
COMMISSION



FEDERAL ELECTION COMMISSION

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

August 4, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles
1604 H. Canterbury Trail
Mt. Pleasant, Michigan 48858

RE: MUR 640

Dear Mr. Tilles:

The Federal Election Commission has received a complaint which alleges you committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 640.

The Commission has reason to believe that the matters alleged therein state a violation of 2 U.S.C. §441f. Specifically, it appears that the \$25,000 that you acquired in June, 1978, was not accounted for in your March 20, 1978, financial statement. It is alleged that part of the sum may have come from an outside source in violation of 2 U.S.C. §441f; and that the \$10,000 stock market profits may have come from your family which would put them over the \$1000 contribution limitation in violation of 2 U.S.C. §441a(1)(A).

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. These materials may include a statement of your assets at the time you became a candidate and a copy of the financial statement you gave to the press on March 20, 1978.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

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

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. Roger B. Telle
1604 N. Canterbury Trail
2817 Pleasant, Michigan 48134

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

943997

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

8/8/78

5. ADDRESS (Complete, only if requested)

6. UNABLE TO DELIVER BECAUSE:

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Roger Tilles)

MUR 640

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 2, 1978, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel in the above-captioned matter to find Reason to Believe that Roger Tilles is in violation of 2 U.S.C. §441f and to so inform the respondent.

Attest:

8/2/78
Date

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

73010080983
79010080983



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: JULY 31, 1978
SUBJECT: MUR 640 First General Counsel's Report
Dated- July 28, 1978
Received in the Office of the Commission
Secretary: 7-28-78, 11:41

The above named document was circulated on a 48 hour
vote basis at 3:00, July 28, 1978.

Commissioner Staebler submitted an objection at
4:26 p.m. on July 28, 1978, thereby placing MUR 640 on
the agenda for Wednesday, August 2, 1978.

A copy of Commissioner Staebler's vote sheet is
attached.

Attachment:
vote sheet

cc: Commissioner Staebler





FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463RECEIVED
OFFICE OF THE
COMMISSIONER

78 JUL 28 P 4: 26

Date and Time Transmitted: 3:00 July 28, 1978Commissioner StenderRETURN TO OFFICE OF COMMISSION SECRETARY BY: 3:00 AUGUST 1, 1978MUR No. 640 - First General Counsel's Report dated 7-28-78

() I approve the recommendation

(X) I object to the recommendation

COMMENTS:

IS RESPONDENT'S FIGURE
INCORRECT? 12,000 + 10,000 = "ABOUT 25,000"

Date: 7/28/78Signature: Neil Smith

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER
 UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE
 RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO
 THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM
 ON THE EXECUTIVE SESSION AGENDA.

780411080900
 730100501

July 28, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 640

Please have the attached First General Counsel's Report on MUR 640 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040080991
~~78040080593~~

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION JUL 28 1978

MUR NO. 640
DATE COMPLAINT RECIEVED
BY OGC June 30, 1978

STAFF MEMBER(S) Donaldson

COMPLAINANT'S NAME: Donald J. Albosta/Albosta for Congress '78
P.O. Box 158
St. Charles, Michigan 48655

RESPONDENT'S NAME: Roger Tilles

RELEVANT STATUTE: 2 U.S.C. §441a(f)

INTERNAL REPORTS CHECKED: Roger Tilles for Congress Committee
Albosta for Congress '78

FEDERAL AGENCIES CHECKED:

SUMMARY OF ALLEGATIONS

It is alleged that Roger B. Tilles, a candidate for the U.S. House of Representatives from the Tenth District of Michigan, is receiving campaign contributions from an outside source that he is reporting as personal funds in violation of 2 U.S.C. §441f. Don Albosta who is Tilles' opponent in the Democratic primary on August 8, 1978, also alleges that there are possible stock transfers from Mr. Tilles' family which would violate 2 U.S.C. §441a(1)(A). (Attachment I).

EVIDENCE

On March 20, 1978, Mr. Tilles released a statement of his personal financial worth to the press, disclosing net worth of \$15,780, of which \$12,000 was cash. (Attachment II). In a newspaper article dated June 20, 1978, Mr. Tilles stated that he had "about \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market. (Attachment III). Tilles' reports reveal that he has spent the following personal funds for his primary election campaign:

4-17-88/12-31-77	\$11,492.77
1-1-78/3-31-78	1,983.97
1-25-78	1,000.00
2-10-78	750.00

3-10-78	6,000.00
4-1-78/6-30-78	4,378.11
6-13-78	5,880.00
*6-28-78	<u>12,325.34</u>
TOTAL	\$43,810.19

*(60 day unsecured note to candidate from European American Bank)

LEGAL ANALYSIS

Mr. Albosta interpreted Tilles' June 20th statement to mean that he had acquired \$25,000 plus \$10,000 from the stock market; however, it appears that the \$10,000 from the stock market was included in the \$25,000 total. In either case, it appears likely that the \$25,000 Tilles acquired in June, 1978, was not accounted for in his March 20, 1978, financial statement. The complainant contends that the stock market profits possibly came from recent transfers of stock by his family which would put them over the \$1000 contribution limitation in violation of 2 U.S.C. §441a(1)(A), but he supplies no evidence to support this.

Based on the March 20, 1978, financial statement of Roger Tilles, and the contributions he made to his committee following that date, it appears there is a possible violation of 2 U.S.C. §441f.

RECOMMENDATION

Find reason to believe that the matter alleged in the complaint states a violation of 2 U.S.C. §441f. Send attached letter.

DON ALBOSTA CONGRESS '78

ATTACHMENT I
FEDERAL ELECTION
COMMISSION

'78 JUN 30 PM 12:42

June 27, 1978

804005

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

Dear Sirs:

In compliance with statute 111.2 "Complaint; filing" in the Federal Election Commission: Regulations of April 1977 I am hereby requesting an investigation and audit of a candidate in the Democratic Primary Election. This complaint is filed against Roger B. Tilles, candidate for the 10th Congressional District of Michigan to the United States House of Representatives.

Complainant: Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, MI 48655

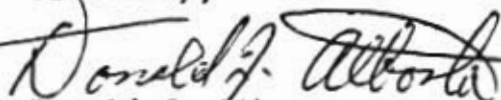
I, Donald J. Albosta, am requesting an investigation and audit of Mr. Tilles' campaign contributions under sections 100.4 "Contributions by persons," sub-sections (ii) and (iii) (A) and 110.1 "Contributions by persons," sub-section (a) (1). On March 20, 1978 Roger Tilles released a statement of his personal financial worth showing his total assets at \$29,000; liabilities of \$13,300 and a net worth of \$15,780. At the same time Mr. Tilles stated that he "spent about \$11,000 of his own money, and has added about \$9,000 so far this year." In June, 1978 "the candidate said he had about \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market."

My contention is that, if Roger Tilles, in June, 1978, came into some \$35,000 more, he is receiving this money from some outside source. It is very possible that the profit of \$10,000 in the stock market is from recent transfers of stock by his family in Long Island, New York. If this is the case, such a transference would be considered a campaign contribution under Section 100.4, Sub-section (iii) (A) which states "anything of value includes securities, goods, ..." and violates Section 110.1. As Mr. Tilles' family members have already contributed the maximum amount allowable, this would be a violation of the F.E.C. Regulations.

To substantiate my contentions I have enclosed copies of the newspaper articles from which this material has been compiled. I believe, using this as evidence, that an investigation and audit are in order.

Thank you for your cooperation in this matter.

Sincerely,

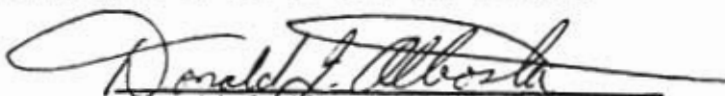



Donald J. Albosta
Candidate for Congress
10th District, Michigan

Enclosure

dmf

Donald J. Albosta personally appeared before me, a notary public on June 28, 1978 and swears the statement made by him is true and factual.


Donald J. Albosta


Notary Public
June 28, 1978

GLORIA SWEATLAND
Notary Public, Saginaw County, Mich.
My Comm. Expires July 30, 1980

73143180905

MIDTOWN

Albosta gets opposition

Tilles declares bid for Congress

BY JOHN A. PURAVS
News Staff Writer

MIDLAND — Democrat Roger B. Tilles declared a candidacy for Congress today that he says has at least an even chance of unseating 13-term incumbent Republican Elford A. Cederberg in the 10th District.

Tilles, 31, an attorney who moved from St. Johns to Mount Pleasant three weeks ago, was kicking off a month of intensive campaigning and fund-raising with candidacy announcements today in Midland, Mount Pleasant and Traverse City.

However, the sessions were only a formality since Tilles has been campaigning in the 23-county district for more than a year.

So has Donald J. Albosta of St. Charles, the other declared contender for the Democratic nomination against Cederberg. But Albosta's campaign has run into staffing problems recently that prompted Tilles to

predict that if he faces a primary contest, he will win it.

Tilles said his optimism comes from being "right on target" with campaign goals that include raising as much as \$200,000, more than twice as much as any Democrat ever has spent in the district. Albosta spent more than \$60,000 in 1976 to take 42.8 percent of the vote against Cederberg.

Tilles today found a financial sta-

tement that put his personal net worth at \$15,782.24, a move he said was prompted by "some comments I've heard about my tremendous wealth. I wish I had it, believe me."

In 1977, Tilles said he spent about \$11,000 of his own money, and has added about \$9,000 so far this year.

Of his remaining personal net worth, about \$12,000 is in cash, he said, and declared he's willing to spend that too in his election bid.

"There won't be that much money coming from my family," added Tilles, a native of Long Island, New York, where his family is in the contracting business. He noted campaign law limits individual contributions to \$1,000 per election.

But Tilles said he hopes to raise "\$10,000 in 10 days" during a series of campaign events starting March 27 in Owosso and continuing in Alma, Midland, Harrison, Cadillac, Big Rapids, Traverse City, Au Gres, St. Helens and Mount Pleasant, site of his campaign headquarters.

He said he also expects "substantial" help from business, especially in Midland and Mount Pleasant, and noted he has "good contacts" within the Michigan Democratic party.

An analysis in Congressional Quarterly said Tilles also may receive aid from "the wealthy Jewish community in the state," but Tilles said he

Democrats statewide are Jewish."

Tilles said the issue of his religion has not been raised so far in the campaign. "If it is raised, I hope it's raised publicly, because I would like to confront it publicly," he declared. "I have always been proud of my religion. I believe people in this district are too intelligent to succumb to this kind of bigotry."

Albosta, a farmer, has insisted the largely rural district never would elect a lawyer. Tilles admitted he has found "no overwhelming love for the legal profession," but contended voters "re-

spect the ability of lawyers to get things done because of their legal training."

Tilles said he was in private law practice only a year. He was elected to the State Board of Education in 1974 but resigned to become top aide to State House Speaker Bobby Crim. He resigned that post in February.

His campaign staff, Tilles said, now includes five full-time paid workers, plus 10 volunteers putting in at least 10 hours a week. All are from the 10th District, he noted.

ATTACHMENT III
Michigan, MI
6/20/78
JCE/78
June 20, 1978

Tilles admits race tight for Democrat nomination

By JOHN A PALEN
Editor
The Daily News

Editor's journal

Roger Tilles is a former bureaucrat who says bureaucrats have too much power in American public life. Now he's seeking the Democratic nomination to run for Congress in the 10th District, and says more accountability for bureaucrats will be one of his main goals if he makes it all the way.

To make it into the race against the incumbent, Elford A. Cederberg, a Midland Republican seeking his 13th term in Congress, Tilles will have to make it past Don Albosta, who had the nomination two years ago and lost. Tilles concedes it will be a tight primary race.

A 32-year-old lawyer who now lives in Mount Pleasant, Tilles came by to see us the other day. Here's what we learned about him.

After growing up in Long Island, he graduated from Amherst and was certified for teaching at the C. W. Post College in New York. He never taught, going to the University of Michigan Law School instead, where he received his juris doctor degree.

Then it was into the bureaucracy, first as director of school law and legislation for the Michigan Department of Education for two years.

In 1973 he joined the law firm of David Laro, a University of Michigan regent, and after about a year ran for statewide office, successfully, for the state Board of Education. He had been a Democrat since 1960.

The board of education race gave him his first campaign exposure in the 10th District.

While on the state board, he also taught education law in the graduate program at Central Michigan University and was state chairman of the National Organization for Legal Problems in Education, whose accomplishment, he says, was the "education of our members."

Meanwhile, as a board of education member, he was trying unsuccessfully to deal with 2,000-page agendas "while the superintendent and the bureaucrats ran the show."

Frustrated with the office, he went into private law practice in 1975 with Abe Singer and Paul Rosenbaum, a

state senator who is trying for the Democratic nomination for U.S. Senator this year in a crowded field.

Eight months later, Bobby Crim, Speaker of the Michigan House, "asked me to give everything up" and be Crim's executive secretary, a position Crim had held under former Speaker William Ryan.

Tilles took the job, he says, because "it was a chance to do things for him (Crim) that I had wanted to do on the state board."

In February of this year, he resigned to run for Congress, and moved recently from St. John to Mount Pleasant, nearer the center of the big district.

It will be "a very tight race" against Albosta, Tilles concedes. "Don has the name identification, but he has not campaigned very vigorously."

Albosta's main drawback, from Tilles' point of view, is that he is a one-issue candidate, that issue being PBB, the chemical contaminant of the state's food chain of which Albosta was an early and vocal critic.

"I agree with him in substance," Tilles said, "but I vehemently disagreed with his approach."

"In 1975 and '76, when we were trying to do research and butt heads against the bureaucrats, he was taking his road show out. He hurt our efforts to get something done."

"We were doing it quietly, while he was having public hearings. He was abrasive and strident, without having done his homework, and he tended to polarize the community."

"The legislature became polarized. Nobody had respect for the results of the circus hearings. He probably slowed our legislative action."

Tilles says his opponent "was also interested in the conspiracy theory," a theory which Tilles doesn't totally discount. There was foot-dragging, he says, in the Farm Bureau, at whose elevator the contaminated feed was mixed, and there was foot-dragging among the bureaucrats in the departments of health and agriculture.

"Our interest was human needs. The bureaucrats were responsive to special interest, instead of the public interest. We need to regain power back from the bureaucrats."

Tilles charges that both parties tend to walk away from problems, but he says there is a younger element in the Michigan Congressional delegation — Bob Traxler, Carl D. Pursell, David A. Stockman, Dale E. Kildee, M. Robert Carr, William M. Brodhead and James J. Blanchard — that he hopes to join.

He contrasts with them what he calls "oldtimers" like Cederberg and Rep. Charles C. Diggs.

Money is a big concern in both the primary and general elections. Tilles said he expects it will cost \$175,000 for him to make it all the way, and he expects Cederberg to spend about \$200,000.

The candidate said he had about \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market. "The question is, when to put it in," he said.

One of his complaints about Cederberg is that the Congressman is supported by the major oil companies and other big national business interests. By contrast, "our campaign will be based in the district," he said.

He says, however, that he has accepted support from the National Committee for an Effective Congress, with whose stand for public financing of campaigns and an end to the seniority system he agrees.

He also has the support of the National and Michigan Education Associations, plus some other scattered labor backing, and is seeking contributions from the Dow and Dow Corning Political Action Committees.

He would accept money from the MEA and NEA, he says, because although they are vested interests, "I am pro public education."

On issues other than the bureaucracy, Tilles took these positions:

— Rural areas like the 10th district need federal aid with problems like housing, redevelopment and unemployment. Such aid is now aimed primarily at the cities.

— The nation needs a strong defense, but Cederberg is "going beyond even what the Pentagon asks for."

— Tilles is personally opposed to abortion, but since it is now legal under certain circumstances, he doesn't see how the federal government can cut off payments to the poor for abortions.

— He agrees with an emphasis on human rights in the nation's foreign policy, "to a realistic extent," but says there are a lot of human rights problems in this country, and that it is important not to be hypocritical about that.

— The job of a Congressman involves "being a manager of affairs and getting things for the people of the district. But it can be more than that. One Congressman can make a large impact, if he says 'I'm not going to vote until I've thought it through.'"



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Roger B. Tilles
1604 H. Canterbury Trail
Mt. Pleasant, Michigan 48858

RE: MUR 640

Dear Mr. Tilles:

The Federal Election Commission has received a complaint which alleges you committed certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 640.

The Commission has reason to believe that the matters alleged therein state a violation of 2 U.S.C. §441f. Specifically, it appears that the \$25,000 that you acquired in June, 1978, was not accounted for in your March 20, 1978, financial statement. It is alleged that part of the sum may have come from an outside source in violation of 2 U.S.C. §441f; and that the \$10,000 stock market profits may have come from your family which would put them over the \$1000 contribution limitation in violation of 2 U.S.C. §441a(1)(A).

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. These materials may include a statement of your assets at the time you became a candidate and a copy of the financial statement you gave to the press on March 20, 1978.

The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at 202-523-4026.

-2-

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

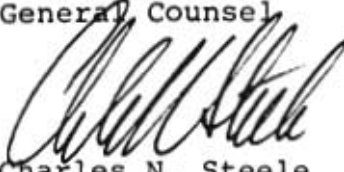
July 6, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTEDDonald J. Albosta
P.O. Box 158
St. Chris, MI 48655

Dear Mr. Albosta:

This is to acknowledge receipt of your complaint of July 3, 1978, alleging violations of the Federal Election Campaign Laws. A staff member has been assigned to analyze your allegations and a recommendation to the Federal Election Commission as to how this matter should be handled will be made shortly. You will be notified as soon as the Commission determines what action should be taken. For your information, we have attached a brief description of the Commission's preliminary procedures for the handling of complaints.

Sincerely yours,

William C. Oldaker
General Counsel
Charles N. Steele
Associate General Counsel

640

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1. 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.
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DON ALBOSTA CONGRESS '78

640
FEDERAL ELECTION
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'78 JUN 30 PM 12:42

June 27, 1978

804086

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

Dear Sirs:

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In compliance with statute 111.2 "Complaint: filing" in the Federal Election Commission: Regulations of April 1977 I am hereby requesting an investigation and audit of a candidate in the Democratic Primary Election. This complaint is filed against Roger B. Tilles, candidate for the 10th Congressional District of Michigan to the United States House of Representatives.

Complainant: Donald J. Albosta
Albosta for Congress - 78
P.O. Box 158
St. Charles, MI 48655

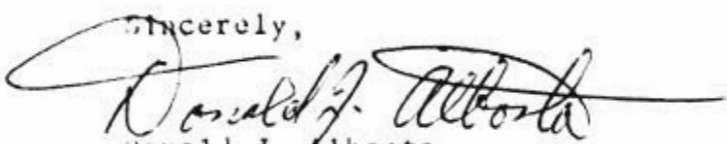
I, Donald J. Albosta, am requesting an investigation and audit of Mr. Tilles' campaign contributions under sections 100.4 "Contributions by persons," sub-sections (ii) and (iii) (A) and 110.1 "Contributions by persons," sub-section (a) (1). On March 20, 1978 Roger Tilles released a statement of his personal financial worth showing his total assets at \$29,000; liabilities of \$13,300 and a net worth of \$15,780. At the same time Mr. Tilles stated that he "spent about \$11,000 of his own money, and has added about \$9,000 so far this year." In June, 1978 "the candidate said he had about \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market."

My contention is that, if Roger Tilles, in June, 1978, came into some \$35,000 more, he is receiving this money from some outside source. It is very possible that the profit of \$10,000 in the stock market is from recent transfers of stock by his family in Long Island, New York. If this is the case, such a transference would be considered a campaign contribution under Section 100.4, Sub-section (iii) (A) which states "anything of value includes securities, goods, ..." and violates Section 110.1. As Mr. Tilles' family members have already contributed the maximum amount allowable, this would be a violation of the F.E.C. Regulations.

To substantiate my contentions I have enclosed copies of the newspaper articles from which this material has been compiled. I believe, using this as evidence, that an investigation and audit are in order.

Thank you for your cooperation in this matter.

Sincerely,



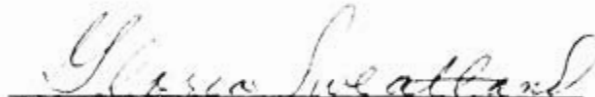
Donald J. Albosta
Candidate for Congress
10th District, Michigan

Enclosure

dmf

Donald J. Albosta personally appeared before me, a notary public on June 28, 1978 and swears the statement made by him is true and factual.


Donald J. Albosta



Notary Public
June 28, 1978

— GLORIA SWATLAND
Notary Public, Saginaw County, Mich.
My Comm. Expires July 30, 1980

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Tilles admits race tight for Democrat nomination

By JOHN A PALEN
Editor
The Daily News

Editor's journal

Roger Tilles is a former bureaucrat who says bureaucrats have too much power in American public life. Now he's seeking the Democratic nomination to run for Congress in the 10th District, and says more accountability for bureaucrats will be one of his main goals if he makes it all the way.

To make it into the race against the incumbent, Edward A. Cederberg, a Midland Republican seeking his 13th term in Congress, Tilles will have to make it past Don Albosta, who had the nomination two years ago and lost. Tilles concedes it will be a tight primary race.

A 32-year-old lawyer who now lives in Mount Pleasant, Tilles came by to see us the other day. Here's what we learned about him.

After growing up in Long Island, he graduated from Amherst and was certified for teaching at the C. W. Post College in New York. He never taught, going to the University of Michigan Law School instead, where he received his juris doctor degree.

Then it was into the bureaucracy, first as director of school law and legislation for the Michigan Department of Education for two years.

In 1973 he joined the law firm of David Laro, a University of Michigan regent, and after about a year ran for statewide office, successfully, for the state Board of Education. He had been a Democrat since 1960.

The board of education race gave him his first campaign exposure in the 10th District.

While on the state board, he also taught education law in the graduate program at Central Michigan University and was state chairman of the National Organization for Legal Problems in Education, whose accomplishment, he says, was the "education of our members."

Meanwhile, as a board of education member, he was trying unsuccessfully to deal with 2,000-page agendas "while the superintendent and the bureaucrats ran the show."

Frustrated with the office, he went into private law practice in 1975 with Abe Singer and Paul Rosenbaum, a

state senator who is trying for the Democratic nomination for U.S. Senator this year in a crowded field.

Eight months later, Bobby Crim, Speaker of the Michigan House, "asked me to give everything up" and he Crim's executive secretary, a position Crim had held under former Speaker William Ryan.

Tilles took the job, he says, because "it was a chance to do things for him (Crim) that I had wanted to do on the state board."

In February of this year, he resigned to run for Congress, and moved recently from St. John to Mount Pleasant, nearer the center of the big district.

It will be "a very tight race" against Albosta, Tilles concedes. "Don has the name identification, but he has no campaign trail."

Albosta's main drawback, from Tilles' point of view, is that he is a one-issue candidate, that issue being PBB, the chemical contaminant of the state's food chain of which Albosta was an early and vocal critic.

"I agree with him in substance," Tilles said, "but I vehemently disagreed with his approach."

"In 1975 and '76, when we were trying to do research and butt heads against the bureaucrats, he was taking his road show out. He hurt our efforts to get something done."

"We were doing it quietly, while he was having public hearings. He was abrasive and strident, without having done his homework, and he tended to polarize the community."

"The legislature became polarized. Nobody had respect for the results of the circus hearings. He probably slowed out legislative action."

Tilles says his opponent "was also interested in the conspiracy theory," a theory which Tilles doesn't totally discount. There was foot-dragging, he says, in the Farm Bureau, at whose elevator the contaminated feed was mixed, and there was foot-dragging among the bureaucrats in the departments of health and agriculture.

"Our interest was human needs. The bureaucrats were responsive to special interest. Instead of the public interest. We need to regain power back from the bureaucrats."

Tilles charges that both parties tend to walk away from problems, but he says there is a younger element in the Michigan Congressional delegation — Bob Traxler, Carl D. Pursell, David A. Stockman, Dale E. Kildee, M. Robert Carr, William M. Brodhead and James J. Blanchard — that he hopes to join.

He contrasts with them what he calls "oldtimers" like Cederberg and Rep. Charles C. Diggs.

Money is a big concern in both the primary and general election. Tilles said he expects it will cost \$125,000 for him to make it all the way, and he expects Cederberg to spend about \$200,000.

The candidate said he had about \$25,000 more of his own money to put into the campaign, aided by a recent profit of \$10,000 in the stock market. "The question is, when to put it in," he said.

One of his complaints about Cederberg is that the Congressman is supported by the major oil companies and other big national business interests. By contrast, "our campaign will be based in the district," he said.

He says, however, that he has accepted support from the National Committee for an Effective Congress, with whose stand for public financing of campaigns and an end to the seniority system he agrees.

He also has the support of the National and Michigan Education Associations, plus some other scattered labor backing, and is seeking contributions from the Dow and Dow Corning Political Action Committees.

He would accept money from the MEA and NEA, he says, because although they are vested interests, "I am pro public education."

On issues other than the bureaucracy, Tilles took these positions:

— Rural areas like the 10th district need federal aid with problems in housing, redevelopment and unemployment. Such aid is now aimed primarily at the cities.

— The nation needs a strong defense, but Cederberg is "going beyond even what the Pentagon asks for."

— Tilles is personally opposed to abortion, but since it is now legal under certain circumstances, he doesn't see how the federal government can cut off payments to the poor for abortions.

— He agrees with an emphasis on human rights in the nation's foreign policy, "to a realistic extent," but says there are a lot of human rights problems in this country, and that it is important not to be hypocritical about that.

— The job of a Congressman involves "being a manager of affairs and getting things for the people of the district. But it can be more than that. One Congressman can make a large impact, if he says 'I'm not going to vote until I've thought it through.'"

hat into ring for Congress

By JIM HARGER
Sun Staff Writer

MOUNT PLEASANT—Roger Tilles says a lot of voters in the 10th Congressional District don't like Representative Elford Cederberg, but they've never had anyone they'd vote for instead.

The 31-year-old Democrat said Monday he is someone they'll vote for instead of Cederberg as he announced his candidacy for the 10th Congressional seat.

Tilles is a former member of the State Board of Education and recently resigned as Executive Secretary to State House Speaker Bobby Crim.

Now a full-time candidate, Tilles recently moved from St. Johns to Mount Pleasant, where he has located his campaign headquarters for the 23-county district.

"I have heard over and over again that what we need is a representative who is vigorous, energetic and experienced at getting things done," said Tilles at a noon press conference at the Mount Pleasant Holiday Inn.

"I am capable and willing to bring that kind of representation to the people of the 10th," he said.

Promising to run a campaign that is "very open and clean," Tilles conducted two other press conferences in Traverse City and Midland Monday to announce his candidacy.

Also in Mount Pleasant Monday was Phil Power, a Democratic candidate for Sen. Robert Griffin's seat in the U.S. Senate.

Power was on hand for the Tilles announcement, although he said the crossing of the two campaigns was not on purpose. He said he was in the area trying to build support for his effort. For details on Power's push for the Senate, see Wednesday's Morning Sun.

Tilles said he will have to draw votes from persons who traditionally have voted for Cederberg because the Democrats have not offered viable candidates challenging Cederberg.

That group of voters he will need to win includes educators, students, farmers and senior citizens, said Tilles, outlining his campaign strategy.

Cederberg does not respond to the needs within his district, said Tilles. "We can no longer sit idly by allowing economic stimulation legislation that affects us in the 10th pass us by," he said. "We must ask ourselves, in dollars and cents, what our current representative has done for us."

"I don't think we should sit by and allow other congressmen to decide what this district should have and should not have," said Tilles. "We need aggressive leadership in Congress so that the interests of the district are provided for and protected."

Tilles attacked Cederberg for his current stance on a bill extending the aid for college students to middle-income families.

Tilles said he was told Monday morning that Cederberg was attacking the plan on the floor of the House because of a technicality. "Whenever we need human service programs that would benefit the 10th District, Mr. Cederberg opposes them," said Tilles.

Tilles promised to fight for economic stimulus programs that would fight the high unemployment found in the 10th District. He also promised to obtain aid for new industries finding alternative sources of energy and new forms of energy.

Tilles also promised to fight for improved health care for senior citizens and production incentives for farmers.

Dow Chemical, one of the district's largest employers, also received kind words from Tilles as he vowed to work for legislation that would "bring up the standards of others to the high standards of Dow."

Tilles' background in education showed strongly in his campaign promises as he recalled his past record in the field.

"I have learned and helped to solve major problems which face our schools through my chairmanship of the Education Legislation Advisory Council, as State Director of School Law and Legislation, as an instructor of school law at Central Michigan University and as a member of the State Board of Education," said Tilles.

"I know education and I know I can vigorously work to bring about fair and realistic approaches to education in Michigan," said Tilles. "I now feel it is time to carry my work to Washington so that we can continue to build better learning environments for our children and our future."

Tilles also recalled his past record as Crim's top aide in cutting back on bureaucracies and their growth. "In my three years with the house, I helped hammer out legislation that took the first major step toward curbing the growth of the bureaucracy in Michigan," he said.

If Tilles is to win the 10th Congressional seat, he may have to first beat out St. Charles Democrat Donald Albosta in a primary race. Tilles said he would welcome a primary battle because the issues in the campaign would gain more attention.

Tilles also began his campaign by disclosing a statement of his financial assets and liabilities. Tilles challenged Albosta and Cederberg to do the same.

According to the statement, Tilles has \$29,082 in assets and \$13,300 in total liabilities, giving him a net worth of \$15,782.

MIDTOWN

Albosta gets opposition

Tilles declares bid for Congress

BY JOHN A. PURAVS
News Staff Writer

MIDLAND — Democrat Roger B. Tilles declared a candidacy for Congress today that he says has at least an even chance of unseating 13-term incumbent Republican Elford A. Cederberg in the 10th District.

Tilles, 31, an attorney who moved from St. Johns to Mount Pleasant three weeks ago, was kicking off a month of intensive campaigning and fund-raising with candidacy announcements today in Midland, Mount Pleasant and Traverse City.

However, the sessions were only a formality since Tilles has been campaigning in the 23-county district for more than a year.

So has Donald J. Albosta of St. Charles, the other declared contender for the Democratic nomination against Cederberg. But Albosta's campaign has run into staffing problems recently that prompted Tilles to

predict that if he faces a primary contest, he will win it.

Tilles said his optimism comes from being "right on target" with campaign goals that include raising as much as \$20,000, more than twice as much as any Democrat ever has spent in the district. Albosta spent more than \$4,000 in 1974, about 40 percent of the

Tilles today issued a financial sta-

tement that put his personal net worth at \$15,782.24, a move he said was prompted by "some comments I've heard about my tremendous wealth. I wish I had it, believe me."

In 1977, Tilles said he spent about \$11,000 of his own money, and has added about \$2,000 so far this year.

Of his remaining personal net worth, about \$12,600 is in cash, he said, and declared he's willing to spend that too in his election bid.

"There won't be that much money coming from my family," added Tilles, a native of Long Island, New York, where his family is in the contracting business. He noted campaign law limits individual contributions to \$1,000 per election.

But Tilles said he hopes to raise "\$10,000 in 10 days" during a series of campaign events starting March 27 in Owosso and continuing in Alma, Midland, Harrison, Cadillac, Big Rapids, Traverse City, Au Gres, St. Helens and Mount Pleasant, site of his campaign headquarters.

He said he also expects "substantial" help from business, especially in Midland and Mount Pleasant, and noted he has "good contacts" within the Michigan Democratic party.

Democrats statewide are Jewish."

Tilles said the issue of his religion has not been raised so far in the campaign. "If it is raised, I hope it's raised publicly, because I would like to confront it publicly," he declared. "I have always been proud of my religion. I believe people in this district are too intelligent to succumb to this kind of bigotry."

Albosta, a farmer, has insisted the largely rural district never would elect a lawyer. Tilles admitted he has found "no overwhelming love for the legal profession," but contended voters "re-

spect the ability of lawyers to get things done because of their legal training."

Tilles said he was in private law practice only a year. He was elected to the State Board of Education in 1974 but resigned to become top aide to State House Speaker Bobby Crim. He resigned that post in February.

His campaign staff, Tilles said, now includes five full-time paid workers, plus 10 volunteers putting in at least 10 hours a week. All are from the 10th District, he noted.

DON ALBOSTA CONGRESS '78

P.O. Box 158

Charles, Michigan 48655

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Federal Election Commissi
1325 K Street, Northwest
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

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