



VED
ELECTION
ION

Giving the attention you deserve.

NOV 16 PM 4:34

November 14, 2017

Federal Election Commission
Office of Complaint Examination
And Legal Administration
Attn: Christal Dennis, Paralegal
999 E Street NW
Washington, DC 20463

FEDERAL

To whom it may concern:

I am responding to the matter MUR 7295 which was received by our institution's Vice Chairman Jonathan Brandt in a letter dated November 8, 2017 and received on November 13, 2017. The complaint states that Peru Federal Savings Bank made sizeable contributions to the Campaign of Brian Towne. The items listed include a total of \$2,550 from 2007 through 2016. These amounts do not represent contributions to the campaign by Peru Federal. These payments were for advertising and entry fees for golf outings. The bank routinely advertises by sponsoring golf outing flag sponsorships as a low-cost method of getting its name out into the community. We sponsor many golf outings throughout the year.

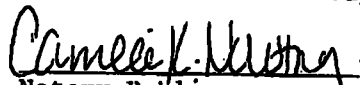
In addition to these small advertising amounts the bank participates in local golf outings each year as a way to network with current and potential customers. The bank either sends a foursome of officers to these golf outing or entertains customers by inviting them to attend and golf in these local golf outings. The golf outings that the bank selects to participate in are ones that are generally well attended and give the bank the opportunity to network with a wide audience of customers and prospects. While the checks were paid to Citizen's for Brian Towne, the bank does not consider these political contributions but rather marketing and advertising expenses as we received advertising and entry/participation in the event. I have enclosed documentation of these expenses dating back to 2013 for which we have documents retained in accordance with our record retention policy. If you have further questions regarding this matter, please feel free to contact me directly at 815-410-2311. Thank you and have a great day.

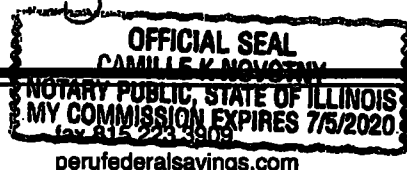
I, Eric Heagy, do hereby affirm that all of the foregoing statements are true and correct to the best of my knowledge and belief.

Sincerely,
PERU FEDERAL SAVINGS BANK


Eric Heagy, CPA
President/CEO/CFO

SUBSCRIBED AND SWORN TO and
before me this 14th day of November, 2017


Notary Public



1730 Fourth St.
P.O. Box 628
Peru, IL 61354
815.223.4300

914 Shooting Park Rd.
Peru, IL 61354
815.224.2213



Current Date: November 13, 2017

Account Number: ;
Capture Date: July 15, 2013
Item Number: 220001833621
Posted Date: July 15, 2013
Posted Item Number: 520
Amount: 400.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354



1730 Fourth St. • 914 Shooting Park Rd.
P.O. Box 628 • Peru, IL 61354-0628



No. 011626

70-7312
2719

CHECK DATE	CHECK NUMBER	CHECK NUMBER
06/27/2013	11626	400.00

PAY**Four Hundred and NO/100 Dollars**

VOID AFTER 90 DAYS
PERU FEDERAL SAVINGS BANK

TO THE CITIZENS FOR BRIAN TOWNE
ORDER OF P.O. BOX 1047
LA SALLE, IL 61301

TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00

AUTHORIZED SIGNATURE

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016551017200

1060
452

BRIAN
TOWNE
STATES ATTORNEY

JUN 27 2013
11626
7060

Golf Outing

Friday, July 19, 2013
SENICA'S OAK RIDGE GOLF CLUB

11:30 am Tee off

Registration at 10:30 am

Shotgun Start/Four Person Scramble

• Men's • Women's • Mixed Divisions

Green Fee • Golf Cart • Giveaway Games & Prizes

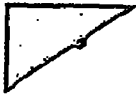
Lunch will be served on the course

**PRIZES
GAMES
FOOD
DRINKS**

OakRidge
is requesting
all players wear
a collared shirt

4 @

**\$100
PER PERSON**



Sylvia Ballard

To: Eric Heagy
Subject: RE: Brian Towne Golf Outing

From: Eric Heagy
Sent: Wednesday, June 26, 2013 4:53 PM
To: Sylvia Ballard
Subject: RE: Brian Towne Golf Outing

Yes – The other two are coming as guests of Peru Federal. Thanks.

Eric Heagy, CPA
President
Chief Executive Officer
Peru Federal Savings Bank

From: Sylvia Ballard
Sent: Wednesday, June 26, 2013 4:48 PM
To: Eric Heagy
Subject: Brian Towne Golf Outing

Eric,

Do you want me to cut a check for all four golfers for the Brian Towne Golf Outing?

Thanks,
Sylvia

Current Date: November 13, 2017

Account Number: ;
Capture Date: May 30, 2014
Item Number: 220002066409
Posted Date: May 30, 2014
Posted Item Number: 666
Amount: 150.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354



1730 Fourth St. • 914 Shooting Park Rd.
P.O. Box 628 • Peru, IL 61354-0628



No. 012557

70-7312
2719

CHECK DATE	CHECK NUMBER	CHECK NUMBER
05/09/2014	12557	150.00

PAY **One Hundred Fifty and NO/100 Dollars**

VOID AFTER 90 DAYS

PERU FEDERAL SAVINGS BANK

TO THE
ORDER OF
CITIZENS FOR BRIAN TOWNE
P.O. BOX 1047
LA SALLE, IL 61301

TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00

AUTHORIZED SIGNATURE

P.F.S.B. #24

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016531017200

BRIAN TOWNE STATES ATTORNEY



Friday, July 18, 2014
Registration at 10:30 am
Tee off at 11:30 am
SENICA'S OAK RIDGE GOLF CLUB
 Lunch served on the course

*Be a Sponsor
for
Brian Towne*

The friends of Brian Towne will hold a golf outing fund raiser Friday, July 18, 2014 at Senica's Oak Ridge Golf Club 11:30 a.m. with lunch served on the course.

The proceeds from your contributions will benefit *Brian Towne's campaign for LaSalle County States Attorney*. Please complete and return this form by July 11, 2014. Your name will be placed in the appropriate manner to recognize your support.

Thank you for your generosity!

Check your choice of Sponsorship

MAY - 9 2014

7230

12557

☒ Hole Sponsorship \$150.00

☐ Half of the Golf Carts \$250.00

☐ Refreshment Cart. \$250.00

☐ I do not wish to participate in the golf outing, but would like to send a donation. \$ _____

Business Name Peru Federal Savings Bank Person _____

Address 1730 4th St.

City Peru State IL Zip 61354

Phone 815-223-4300 Fax _____

Your Signature [Signature] ☐ Check ☐ Cash

No logos - two lines only: _____

Remit to and checks payable to: Citizens for Towne State's Attorney • P.O. Box 1047 • LaSalle, IL 61301

A copy of our report is filed with the State Board of Elections and the County Clerk is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois, or from the county clerk, Etna Road, Ottawa, Illinois.

Current Date: November 13, 2017

Account Number:

Capture Date: July 25, 2014

Item Number: 220002107406

Posted Date: July 25, 2014

Posted Item Number: 515

Amount: 400.00

Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354



Peru
Federal
Savings
Bank



FDIC

1730 Fourth St. • 914 Shooting Park Rd.
P.O. Box 628 • Peru, IL 61354-0628

No. 012741

70-7312
2719

CHECK DATE

CHECK NUMBER

CHECK NUMBER

07/16/2014

12741

400.00

PAY **Four Hundred and NO/100 Dollars**

VOID AFTER 90 DAYS

PERU FEDERAL SAVINGS BANK

TO THE
ORDER OF

CITIZENS FOR BRIAN TOWNE

P.O. BOX 1047

LA SALLE IL 61301

TWO SIGNATURES REQUIRED FOR AMOUNTS OVER \$10,000.00

AUTHORIZED SIGNATURE

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. CITY
016531017200

**BRIAN
TOWNE
STATES ATTORNEY**

Friday, July 18, 2014
SENICA'S OAK RIDGE GOLF CLUB

11:30 am Tee off

Registration at 10:30 am

Shotgun Start/Four Person Scramble

• Men's • Women's • Mixed Divisions

Green Fee • Golf Cart • Giveaway Games & Prizes

Lunch will be served on the course

**Golf
Outing**

**PRIZES
GAMES
FOOD
DRINKS**

OakRidge
is requesting
all players wear
a collared shirt

**\$100
PER PERSON**

Remit to and checks payable to: Citizens for Towne State's Attorney • P.O. Box 1047 • LaSalle, IL 61301

Do you have a 4 some? ☒ Yes ☐ No If not please indicate number in group _____

Total Dollar Amount Enclosed \$ 400

I cannot attend, but would like to donate.
Please accept my donation of \$ _____

1. Name Eric Heagy
Address 1730 4th St
City Peru State IL Zip 61357
Phone 815-223-4300
Senica's OakRidge Golf Club Member? ☐ Yes ☒ No
3. Name Doug Overlee
Address _____
City _____ State _____ Zip _____
Phone _____
Senica's OakRidge Golf Club Member? ☐ Yes ☒ No

2. Name Chris Vaske
Address _____
City _____ State _____ Zip _____
Phone _____
Senica's OakRidge Golf Club Member? ☐ Yes ☒ No
4. Name GARY Curtain
Address _____
City _____ State _____ Zip _____
Phone _____
Senica's OakRidge Golf Club Member? ☐ Yes ☒ No

A copy of our report is filed with the State Board of Elections and the County Clerk is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois, or from the county clerk, Etna Road, Ottawa, Illinois.

For Additional Information call: John Balestri - 815-223-6600 or Jim Conness - 815-228-8248

PLEASE INCLUDE PAYMENT WITH ENTRY REGISTRATION

Current Date: November 13, 2017

Account Number: ;
Capture Date: June 05, 2015
Item Number: 220002327436
Posted Date: June 05, 2015
Posted Item Number: 743
Amount: 150.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354



1730 Fourth St. • 914 Shooting Park Rd.
P.O. Box 628 • Peru, IL 61354-0628



No. 013693

70-7312
2719

CHECK DATE

CHECK NUMBER

CHECK NUMBER

05/21/2015

13693

150.00

PAY **One Hundred Fifty and NO/100 Dollars**

VOID AFTER 90 DAYS

PERU FEDERAL SAVINGS BANK

TO THE
ORDER OF

CITIZENS FOR BRIAN TOWNE
P.O. BOX 1047
LA SALLE IL 61301

TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00

AUTHORIZED SIGNATURE

P.P.S

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE, ST. ATTY
016621017200

BRIAN TOWNE STATES ATTORNEY

Golf Outing

Friday, June 19, 2015

Registration at 10:30 am

Tee off at 11:30 am

SENICA'S OAKRIDGE GOLF CLUB

Lunch served on the course

*Be a Sponsor
for
Brian Towne*

The friends of Brian Towne will hold a golf outing fund raiser Friday, June 19, 2015 at Senica's Oak Ridge Golf Club 11:30 a.m. with lunch served on the course.

The proceeds from your contributions will benefit *Brian Towne's campaign for LaSalle County States Attorney*. Please complete and return this form by June 12, 2015. Your name will be placed in the appropriate manner to recognize your support.

Thank you for your generosity!

MAY 21 2015

Check your choice of Sponsorship

☒ Hole Sponsorship \$150.00

☐ Half of the Golf Carts \$250.00

☐ Refreshment Cart. \$250.00

☐ I do not wish to participate in the golf outing, but would like to send a donation. \$ _____

Business Name Peru Federal Savings Bank Person _____

Address 1730 4th St

City Peru State IL Zip 61354

Phone 815-223-4300 Fax 815-223-3909

Your Signature [Signature] ☒ Check ☐ Cash

No logos - two lines only: Peru Federal Savings Bank

Remit to and checks payable to: Citizens for Towne State's Attorney • P.O. Box 1047 • LaSalle, IL 61301

A copy of our report is filed with the State Board of Elections and the County Clerk is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois, or from the county clerk, Etna Road, Ottawa, Illinois.

Current Date: November 13, 2017

Account Number: }
Capture Date: June 17, 2015
Item Number: 220002335823
Posted Date: June 17, 2015
Posted Item Number: 726
Amount: 400.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354



1730 Fourth St. • 814 Shooting Park Rd.
P.O. Box 828 • Peru, IL 61354-0628



No. 013750

70-7312
2719

CHECK DATE	CHECK NUMBER	CHECK NUMBER
06/10/2015	13750	400.00

PAY **Four Hundred and NO/100 Dollars**

TO THE
ORDER OF
CITIZENS FOR BRIAN TOWNE
P.O. BOX 1047
LA SALLE IL 61301

VOID AFTER 90 DAYS
PERU FEDERAL SAVINGS BANK

TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00

AUTHORIZED SIGNATURE

P.F.S.B. #21

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016531017200

BRIAN TOWNE STATES ATTORNEY

Friday, June 19, 2015

SENICA'S OAK RIDGE GOLF CLUB

11:30 am Tee off

Registration at 10:30 am

Shotgun Start/Four Person Scramble

• Men's • Women's • Mixed Divisions

Green Fee • Golf Cart • Giveaway Games & Prizes

Lunch will be served on the course

OakRidge
is requesting
all players wear
a collared shirt

**\$100
PER PERSON**

**PRIZES
GAMES
FOOD
DRINKS**

Remit to and checks payable to: Citizens for Towne State's Attorney • P.O. Box 1047 • LaSalle, IL 61301

Do you have a 4 some? ☒ Yes ☐ No If not please indicate number in group _____

Total Dollar Amount Enclosed \$ _____

I cannot attend, but would like to donate.
Please accept my donation of \$ _____

1. Name Dale Tieman

Address _____

City _____ State _____ Zip _____

Phone _____

Senica's OakRidge Golf Club Member? ☐ Yes ☒ No

2. Name Dean Tieman

Address _____

City _____ State _____ Zip _____

Phone _____

Senica's OakRidge Golf Club Member? ☐ Yes ☒ No

3. Name CHARLIE LISHERSKI

Address _____

City _____ State _____ Zip _____

Phone _____

Senica's OakRidge Golf Club Member? ☐ Yes ☐ No

4. Name ROGER SINES

Address _____

City _____ State _____ Zip _____

Phone _____

Senica's OakRidge Golf Club Member? ☐ Yes ☐ No

A copy of our report is filed with the State Board of Elections and the County Clerk is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois, or from the county clerk, Etna Road, Ottawa, Illinois.

For Additional Information call: John Balestri - 815-223-6600 or Jim Connors - 815-228-8248

PLEASE INCLUDE PAYMENT WITH ENTRY REGISTRATION



APPLE PRESS - PERU, IL

Current Date: November 13, 2017

Account Number: ;
Capture Date: May 24, 2016
Item Number: 220002560075
Posted Date: May 24, 2016
Posted Item Number: 754
Amount: 150.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354



1730 Fourth St. • 914 Shooting Park Rd.
P.O. Box 628 • Peru, IL 61354-0628



No. 014735

70-7312
2719

CHECK DATE

CHECK NUMBER

CHECK NUMBER

05/17/2016

14735

150.00

PAY **One Hundred Fifty and NO/100 Dollars**

VOID AFTER 90 DAYS

PERU FEDERAL SAVINGS BANK

TO THE
ORDER OF

CITIZENS FOR BRIAN TOWNE
P.O. BOX 1047
LA SALLE IL 61301

TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00

AUTHORIZED SIGNATURE

PFSE 2

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016531017200

BRIAN TOWNE STATES ATTORNEY

Friday, June 10, 2016

Registration at 10:30 am

Tee off at 11:30 am

SENICA'S OAK RIDGE GOLF CLUB

Lunch served on the course

Golf Outing

*Be a Sponsor
for
Brian Towne*

Citizens for Towne State's Attorney will hold a golf outing fund raiser **Friday, June 10, 2016** at Senica's Oak Ridge Golf Club 11:30 a.m. with lunch served on the course.

The proceeds from your contributions will benefit **Brian Towne's campaign for LaSalle County States Attorney**. Please complete and return this form by **June 3, 2016**. Your name will be placed in the appropriate manner to recognize your support.

Thank you for your generosity!

Check your choice of Sponsorship

☒ **Hole Sponsorship** \$150.00

☐ **Half of the Golf Carts** \$250.00

☐ **Refreshment Cart** \$200.00

☐ **Food Sponsor** \$300.00

☐ **I do not wish to participate in the golf outing, but would like to send a donation.** \$ _____

Business Name Peru Federal Savings Bank Person _____

Address 1730 4th St.

City Peru State IL Zip 61357

Phone 815-223-4300 Fax _____

Your Signature [Signature] ☒ Check ☐ Cash

No logos - two lines only: Peru Federal Savings Bank

Remit to and checks payable to: **Citizens for Towne State's Attorney • P.O. Box 1047 • LaSalle, IL 61301**

A copy of our report is filed with the State Board of Elections and the County Clerk is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois, or from the county clerk, Etna Road, Ottawa, Illinois.



For Additional Information call: John Balestri - 815-223-8600 or Jim Conness - 815-228-8248

[Handwritten signature]

Current Date: November 13, 2017

Account Number: ;
Capture Date: June 09, 2016
Item Number: 220002571552
Posted Date: June 09, 2016
Posted Item Number: 381
Amount: 400.00
Record Type: Debit

PERU FEDERAL SAVINGS BANK
ACCOUNTS PAYABLE
1730 4TH ST
PERU IL 61354



Peru
Federal
Savings
Bank



FDIC

1730 Fourth St. • 814 Shooting Park Rd.
P.O. Box 628 • Peru, IL 61354-0628

No. 014779 70-7312
2719

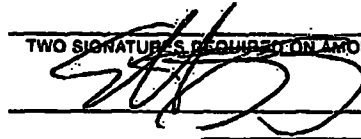
CHECK DATE	CHECK NUMBER	CHECK NUMBER
05/31/2016	14779	400.00

PAY **Four Hundred and NO/100 Dollars**

VOID AFTER 90 DAYS
PERU FEDERAL SAVINGS BANK

TO THE
ORDER OF
CITIZENS FOR BRIAN TOWNE
P.O. BOX 1047
LA SALLE IL 61301

TWO SIGNATURES REQUIRED ON AMOUNTS OVER \$10,000.00


AUTHORIZED SIGNATURE

PFSB #97

PAY TO THE ORDER OF
PERU FEDERAL SAVINGS BANK
FOR DEPOSIT ONLY
CITIZENS FOR TOWNE ST. ATTY
016531017200

Golf Outing

SENICA'S OAK RIDGE GOLF CLUB

11:30 am Tee off

Registration at 10:30 am

Shotgun Start/Four Person Scramble

• Men's • Women's • Mixed Divisions

Green Fee • Golf Cart • Giveaway Games & Prizes

Lunch will be served on the course

**OakRidge
is requesting
all players wear
a collared shirt**

**\$100
PER PERSON**

Remit to and checks payable to: Citizens for Towne State's Attorney • P.O. Box 1047 • LaSalle, IL 61301

Do you have a 4 some? ☐ Yes ☐ No **If not please indicate number in group** _____

Total Dollar Amount Enclosed \$_____

I cannot attend, but would like to donate.
Please accept my donation of \$ _____

1. Name ERIC HAZOV

Address 1730 9th St

City Per State IL Zip 61359

Phone 815-225-9300

Senica's OakRidge Golf Club Member? ☐ Yes ☐ No

3. Name TBD

Address

City _____ State _____ Zip 1477

Phone _____ 704

Senica's OakRidge Golf Club Member? ☐ Yes ☐ No

2. Name TBI

Address

City _____ State _____ Zip _____

Phone 800-368-2267

Senica's OakRidge Golf Club Member? ☐ Yes ☐ No

4. Name TBD

Address

City _____ State _____ Zip _____

Phone _____

Senica's OakRidge Golf Club Member? ☐ Yes ☐ No

A copy of our report is filed with the State Board of Elections and the County Clerk is (or will be) available for purchase from the State Board of Elections, Springfield, Illinois, or from the county clerk, Etna Road, Ottawa, Illinois.

For Additional Information call: John Balestri - 815-223-6600 or Jim Connors - 815-228-8248

PLEASE INCLUDE PAYMENT WITH ENTRY REGISTRATION



#400