

Giving the attention you deserve.

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HERAL

November 14, 2017

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

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.

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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

1730 Fourth St. P.O. Box 628 Peru, IL 61354 815.223.4300 914 Shooting Park Rd. Peru, IL 61354 815.224.2213

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

OFFICIAL SEAL CAMILLE & NOVOTINE NOTARY PUBLIC, STATE OF ILLINOIS MY COMMISSION EXPIRES 7/5/2020. perufederalsavings.com



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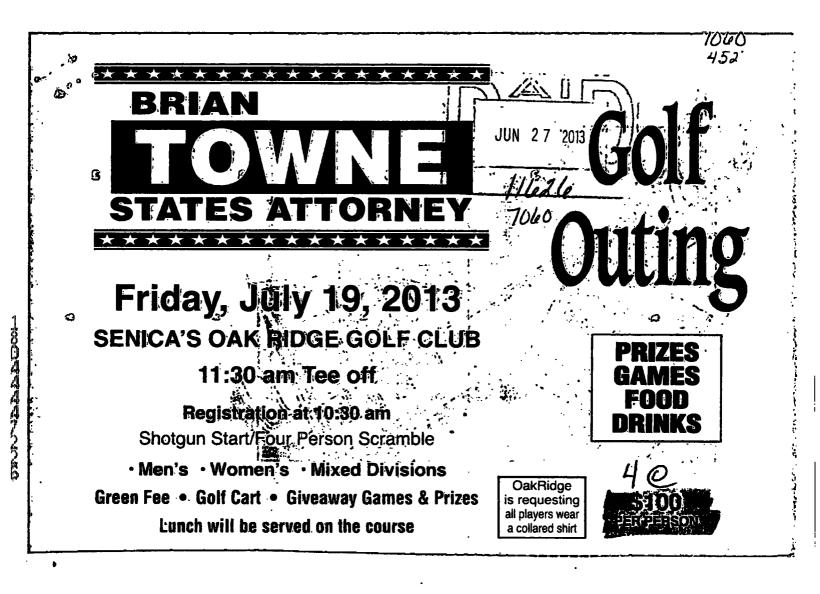
November 13, 2017

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Account Number:	;
Capture Date:	July 15, 2013
tem 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

Peru Federal Savings Bank 1730 Fourth 31. • 914 Shooting Park Rd. P.O. Box 528 • Peru, IL 01354-0528	No. 011626 70-7312 2719 CHECK DATE CHECK NUMBER CHECK NUMBER 06/27/2013 11626 400.00
PAY**Four Hundred and NO/100 Dollars** TOTHE CITIZENS FOR BRIAN TOWNE ORDER OFP.O. BOX 1047 LA SALLE, IL 61301	VOID AFTER 90 DAYS PERU FEDERAL BAVINGS BANK TWO SIGNATORES REDUIRED ON AMOUNTS OVER \$10,000.00 AUTHORIZED SIGNATURE
	PAY TO THE ORDER OF PERU FEDERAL SAVINGS BANK CITIZENS FOR TOWNE ST. ATTY 01655 1017200



Sylvia Ballard

To: Subject: Eric Heagy 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

Eríc,

1804447259

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

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Thanks, Sylvía

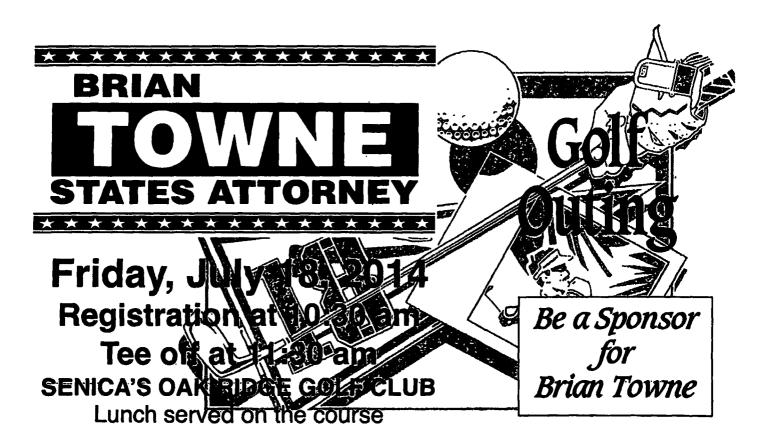
November 13, 2017

Account Number:Capture Date:MayItem Number:2200Posted Date:MayPosted Item Number:666Amount:150.Record Type:Debi

; May 30, 2014 220002066409 May 30, 2014 666 150.00 Debit

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

Peru Federal Savings Bank 1730 Fourth &L • S14 Bhooting Patk Rd. P.O. Box 624 • Paru, IL e1354-0828	- No. ()12557 70.7312 2719
P.O. Box 628 • Peru, H. 61354-0628	CHECK DATE CHECK NUMBER	CHECK NUMBER
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	P.F.S.B, #24	PAY TO THE ORDER OF PERU FEDERAL SAVINGS BANK FOR DEPOSIT ONLY CITIZENS FOR TOWNE ST. ATTY 016531017200



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.

torney. Please complete and return this form by July anner to recognize your support. ank you for your generosity!	y 11, 2014. Your name will be placed in the appropriate MAY - 9 2014
Check your choic	e of Sponsorship 72.
	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	It would like to send a donation. \$
Business Name Peru Federal Snum	KS Brailkerson
Address 1730 4th St.	
city Peru	State_(<u></u>
	OldleAlp

Your 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.



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

November 13, 2017

Account Number:	•
Capture Date:	Jul
Item Number:	22(
Posted Date:	Jui
Posted Item Number:	51
Amount:	40
Record Type:	De

July 25, 2014 220002107406 July 25, 2014 515 400.00 Debit

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

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1730 Fourth St. • 914 Shooting Park Rd. P.O. Box 628 • Penu, IL 61334-0629	CHECK DATE CHECK NUMBER CHECK NUMBER
	07/16/2014 12741 400.00
PAY **Four Hundred and NO/100 Dollars**	VOID AFTER 90 DAYS
TO THE CITIZENS FOR BRIAN TOWNE ORDER OF P.O. BOX 1047	PERU FEDERAL SAVINGS BANK
LA SALLE IL 61301	TWO SIGNAT ORES AFOLINTED DITEMOUNTS OVER \$10,000.00
	AUTHORAZED SIGNATURE
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BRIAN	
STATES ATTOR	
Friday, July 18	
SENICA'S OAK RIDGE GO	
11:30 am Teo 11	GAMES
Registration at 1020 am	FOOD
Shotgun Start/Hour Person Ser	
• Men's • Women's • Mixed Div	
Green Fee • Golf Cart • Giveaway Gan	nes & Prizes is requesting \$100
Lunch will be served on the cou	rse a collared shirt PER PERSON
Remit to and checks payable to: Citizens for Tow	vne State's Attorney · P.O. Box 1047 · LaSalle, IL 61301
Do you have a 4 some? 🛈 Xes 🗆 No 🛛 If not please indicat	
Total Dollar Amount Enclosed \$ 400	Please accept my donation of \$
1. Name ERIC HEAGY	2. Name Chris Vaske
Address 1730 445 57	Address
City <u>fers</u> state <u>1</u> zip <u>b(357</u>	CityStateZip
Phone 815-223-4300	Phone
Senica's OakRidge Golf Club Member? 🗆 Yes XNo	Senica's OakRidge Golf Club Member? 🗆 Yes 🖾 No
3. Name Doug Overlee	4. Name GARY CURTAIN
Address	
CityStateZip	CityState Zip
Phone	Phone
Senica's OakRidge Golf Club Member? Yes No	Senica's OakRidge Golf Club Member?
Springfield, Illinois, or from the For Additional Information call: John Bal	county Clerk is (or will be) available for purchase from the State Board of Elections, e county clerk, Etna Road, Ottawa, Illinois. astri - 815-223-6600 or Jim Conness - 815-228-8248 NT WITH ENTRY REGISTRATION

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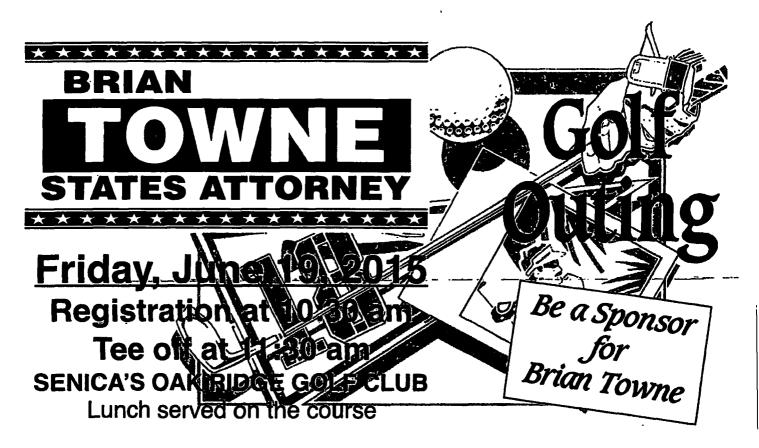
November 13, 2017

Account Number:Capture Date:JuneItem Number:22000Posted Date:JunePosted item Number:743Amount:150.0Record Type:Debit

; June 05, 2015 220002327436 June 05, 2015 743 150.00 Debit

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

PAY **One Hundred Fifty and NO/100 Dollars To THE ORDER OF CITIZENS FOR BRIAN TOWNE P.O. BOX 1047 LA SALLE IL 61301	VOIDA	13693 15 FTER 90 DAYS SERAL SAVINGS BANK HELT ON-ALLOUNTS: OVER \$10,	16A 50.00
	S'H'c	R TC	PAY TO THE ORDER OF



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!*

☐ Hole Sponsorship\$150.00	ce of Sponsorship MAY 2 1 2015 //
I do not wish to participate in the golf outing, b	ut would like to send a donation. \$
Business Name Peru Faleran Savings B	awk_Person
Address 1730 4th 5t	
cityPeru	State 1 Zip 6(354
Phone 815-223-4306	•
Your Signature 20	Check 🗆 Cash
No logos - two lines only: Peru Feleraz	Savings Bank

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.



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November 13, 2017

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

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

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Peru Federal Savings Bank 1730 Fourth Ba + Bid Shooting Park Rd FO. Bax 528 - Park, LE 61384-0628 PAY **Four Hundred and NO/100 Dollars** TO THE ORDER OF CITIZENS FOR BRIAN TOWNE P.O. BOX 1047 LA SALLE IL 61301	No. 013750 70-7312 2719 CHECK DATE CHECK NUMBER CHECK NUMBER 06/10/2015 13750 400.00 VOID AFTER 90 DAYS PERU FEDERAL SAVINGS BANK TWO SIGNATURES DEOWNED ON AMOUNTS: OVER \$10,000.00 IP AUTHORIZED SIGNATURE
	PAY TO THE ORDER OF PERU FEDERAL SAVINGS BANK FOR DEPOSIT ONLY 016531017290 P.F.S.D. #21 P.F.S.D. #21

BRIAN BRIAN STATES ATTOR	
Friday, June 1 SENICA'S OAK POCE GE 11:30 am Tec off Registration at total am Shotgun Start Four Person Ser	GAMES FOOD J37.5 DRINKS
Men's · Women's · Mixed Div Green Fee • Golf Cart • Giveaway Gar Lunch will be served on the cou	mes & Prizes OakRidge is requesting \$100
Do you have a 4 some? I Yes I No If not please indica Total Dollar Amount Enclosed \$	
1. Name Dale Tieman	2. Name Dean Treman
Address	Address
· · · · · · · · · · · · · · · ·	
City Zip	State Zip
Phone	Phone
Senica's OakRidge Golf Club Member? 🛛 Yes 🖃 Tio	Senica's OakRidge Golf Club Member? 🛛 Yes 🖆 No
3. Name CHARLIC LISHERDSK'	4. Name ZOGER SINCS
Address	
City State Zip	City State Zip
_	Phone
Phone	Senica's OakRidge Golf Club Member? ☐ Yes ☐ No
A copy of our report is filed with the State Board of Elections and the O Springfield, Winols, or from th For Additional Information call: John Bal	County Clerk is (or will be) available for purchase from the State Board of Elections, te county clerk, Etna Road, Ottawa, Illinols. lestri - 815-223-6600 or Jim Conness - 815-228-8248 ENT WITH ENTRY REGISTRATION

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PLEASE INCLUDE PAYMENT WITH ENTRY REGISTRATION

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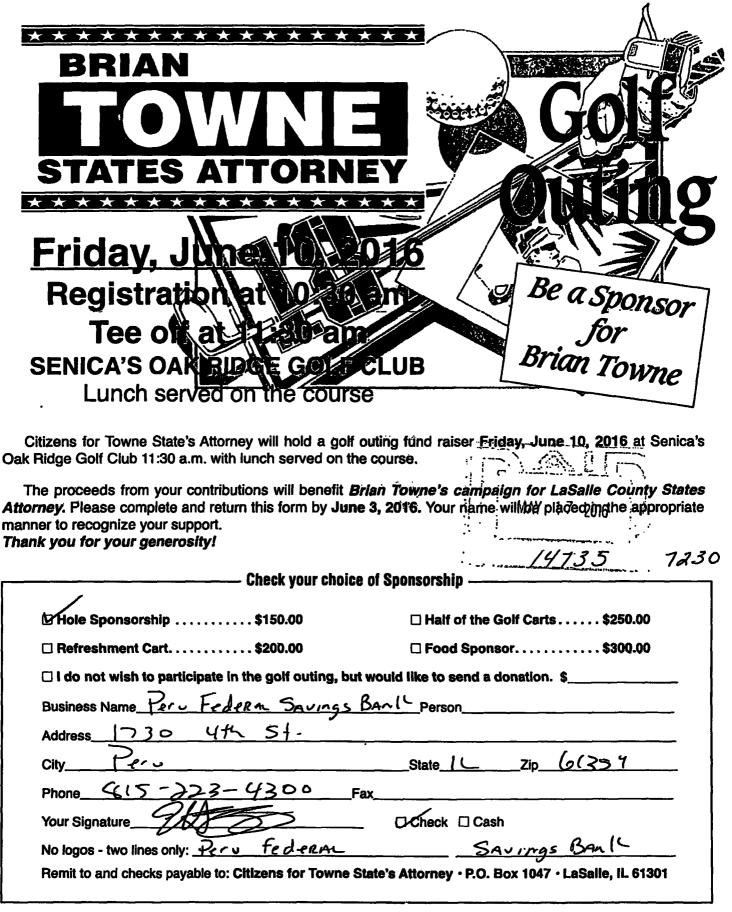
November 13, 2017

Account Number:Capture Date:MayItem Number:2200Posted Date:MayPosted Item Number:754Amount:150.Record Type:Debi

May 24, 2016
 220002560075
 May 24, 2016
 754
 150.00
 Debit

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

Peru Federal Savings Bank 1730 Fourth St. • 914 Shooting Park Rd. P.O. Bax 623 • Peru, IL 61354-0628	CHECK DATE CHECK NUMBER	, 014735 ^{-<u>70-7312</u> 2718 снеск нимвея}
	05/17/2016 14735	150.00
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	PFSE	AY TO THE ORDE FEDERAL SAVIN FOR DEPOSIT OI INS FOR TOWNE 016531017200
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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

November 13, 2017

Account Number:3Capture Date:June 09, 2016Item Number:220002571552Posted Date:June 09, 2016Posted Item Number:381Amount:400.00Record Type:Debit

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

Peru Federal Savings 1730 Fourth St. + 814 Bhooling Park Rd. P.O. Dox 628 + Peru, IL 61354-0628	No. 014779 70-7312 2719 CHECK DATE CHECK NUMBER CHECK NUMBER
PAY **Four Hundred and NO/100 Dollars**	05/31/2016 14779 400.00 VOID AFTER 90 DAYS PERU FEDERAL SAVINGS BANK TWO SIGNATURES DECHIPSOT ON AMOUNTS OVER \$10,000.00
	PAY TO THE ORDER OF PERU FEDERAL SAVINGS BANK FOR DEPOSIT ONLY O16531017200 PFSB #77

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