



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20541

THIS IS THE END OF TCR # 813

Date Filmed 2/14/79 Camera No. --- 2

Cameraman bpc



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

SD
12-7-78

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4873.

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

79040102013



FEDERAL ELECTION COMMISSION

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

February 5, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alvin M. Binder, Esquire
Binder, Moore, and Howell
511 East Pearl Street
Jackson, Mississippi 39205

Re: MUR 813-Governor Cliff
Finch for U.S. Senate
Campaign Committee

Dear Mr. Binder:

This letter will confirm the Commission's receipt of your letter, dated January 15, 1979, in connection with your client, the Governor Cliff Finch for U.S. Senate Campaign Committee. After reviewing your letter, the Commission determined, on February 1, 1979 to find no reasonable cause to believe that your client violated 2 U.S.C. § 441f and 2 U.S.C. § 434(b)(12). Accordingly, the Commission has closed its file on this matter.

Should you have any further questions, please call Susan Donaldson at (202) 523-4073.

Sincerely,

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

William C. Oldaker
General Counsel

79040102011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alvin M. Binder, Esquire
Binder, Moore, and Howell
511 East Pearl Street
Jackson, Mississippi 39201

Re: MUR 813 Governor Cliff
Finch for U.S. Senate
Campaign Committee

Dear Mr. Binder:

This letter will confirm the Commission's receipt of your letter, dated January 15, 1979, in connection with your client, the Governor Cliff Finch for U.S. Senate Campaign Committee. After reviewing your letter, the Commission determined, on 1979 to find no reasonable cause to believe that your client violated 2 U.S.C. § 441f and 2 U.S.C. § 4434(b)(12). Accordingly, the Commission has closed its file on this matter.

Should you have any further questions, please call Susan Donaldson at (202) 523-4073.

Sincerely,

151
William C. Oldaker
General Counsel

79040102013

40
2-5-79

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter)
)
) MUR 813
Governor Cliff Finch for)
U.S. Senate Campaign Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 1, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated February 1, 1979, regarding the above-captioned matter:

1. Find no reasonable cause to believe that the Governor Cliff Finch for U.S. Senate Campaign Committee violated 2 U.S.C. §441f or 2 U.S.C. §434(b)(12).
2. Send the letter attached to the above-named report.
3. Close the file.

Voting for this determination were Commissioners Springer, Aikens, Tiernan, McGarry, and Thomson.

Attest:

2/1/79

Marjorie W. Emmons

Date

Marjorie W. Emmons, Secretary to the Commission

Received in Office of Commission Secretary: 1-30-79, 10:08

Circulated on 48 hour vote basis: 1-30-79, 2:15

January 30, 1979

MEMORANDUM TO: Marge Hanson
FROM: Elissa T. Carr
SUBJECT: MUR 813

Please have the attached General Counsel's Report
on MUR 813 distributed to the Commission on a 48 hour
tally basis.

Thank you.

79040102017

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Governor Cliff Finch for)
U.S. Senate Campaign Committee)

MUR 813
79 JAN 30 10:08

GENERAL COUNSEL'S REPORT

Allegations

A newspaper article which appeared in the Delta Democrat on August 27, 1978, alleged that the Governor Cliff Finch for U.S. Senate Campaign Committee ("the Committee") violated 2 U.S.C. §441f in connection with a letter which solicited contributions in the name of another; and 2 U.S.C. §434(b)(12) for failing to report all of the Committee's campaign debts.

Evidence and Analysis

The Commission, on December 6, 1978, found reason to believe that the Committee may have violated 2 U.S.C. §441f and 2 U.S.C. §434(b)(12). Alvin M. Binder, counsel for the Committee, responded to the allegations in a letter dated January 15, 1979 (Attachment I).

2 U.S.C. §441f prohibits contributions made in the name of another person. The Delta Democrat article alleged that three individuals associated with the Finch campaign sent out solicitation letters which stated that if you had already contributed the maximum amount to Finch's campaign, then you could contribute in the name of your wife or children. Mr. Binder sent a copy of one of the solicitation letters to the Commission. The relevant part of the letter reads as follows:

"If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100. However, this will not restrict your wife nor family from contributing should they desire to do so.

"We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days."

It appears that the newspaper article was inaccurate in connection with the Committee's solicitation for contributions prohibited by 2 U.S.C. § 441f.

2 U.S.C. § 434(b)(12) requires that each Committee's report disclose the amount and nature of debts and obligations owed by or to the committee... The newspaper article alleged that the Finch deficit, reported at \$136,582 was actually \$300,000 when "all of the loans around the state are thrown in." Mr. Binder stated that the Committee "reported timely all debts of the campaign as compiled by the bookkeeper who was supervised by a certified public accounting firm." Binder listed all of the loans which were authorized by the Committee. Each loan had been disclosed by the Committee on their FEC reports. There is no evidence to indicate that the Committee authorized loans which were not disclosed in violation of 2 U.S.C. § 434(b)(12).

Recommendation

Find no reasonable cause to believe that the Governor Cliff Finch for U. S. Senate Campaign Committee violated 2 U.S.C. § 441f or 2 U.S.C. § 434(b)(12). Send attached letter. Close the file.

Attachment

1. Response from Binder dated January 15, 1979.
2. Proposed letter to Binder

DATE

WILLIAM C. OLDAKER
GENERAL COUNSEL

ATTACHMENT I

QAC

9084

LAW OFFICES
BINDER, MOORE & HOWELL
511 EAST PEARL STREET
P.O. BOX 25
JACKSON, MISSISSIPPI 39205

79 JAN 15 PM 2:13

ALVIN M. BINDER
RUSSELL D. MOORE, III
WILLIAM B. HOWELL
WILLIAM B. KIRKSEY
BOBBY B. DeLAUGHTER

January 15, 1979

MILLARD M. BUSH (1968)
TELEPHONE
948-8800
AREA CODE 601

000373

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

Re: MUR 813

Dear Mr. Oldaker:

On January 12, 1979, at approximately 10:00 a.m. Dr. Howard D. Clark received a letter from you under date of December 7, 1978. He promptly telephoned me and sent a copy of the letter to me which we received the morning of January 13, 1979. This morning I telephoned Mrs. Susan Donaldson to tell her of our receipt of the letter and our response. A copy of your letter is attached hereto as Exhibit "A".

I wish to advise that I will represent Dr. Howard D. Clark, Mr. Mike Amis and Mr. Benny Pittman in response to the matters complained of.

FIRST ALLEGATION: "It is alleged that you, Mike Amis and Benny Pittman, sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election Law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C., Sec. 441f)."

The allegation is denied by Messrs. Clark, Amis and Pittman as being inaccurate and not at all correct.

The Governor of Mississippi did not receive the democratic endorsement in his Senate race and as the records will reflect he had a deficit in excess of \$100,000.00 reported to the Federal Election Commission and filed appropriately with the Secretary of State of the State of Mississippi and with the Federal Election Commission.

Mr. William C. Oldaker
January 15, 1979
Page Two

A letter was mailed by the named individuals in the alleged complaint; however, the letter does not state that if one had contributed the maximum amount then that person could contribute in the name of his wife or children. The appropriate part of the letter that is relevant states as follows:

"If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100.00. However, this will not restrict your wife nor family from contributing should they desire to do so.

"We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days."

This letter containing the above statement is attached hereto as Exhibit "B".

The letter speaks for itself and does not in any manner imply what has been alleged.

SECOND ALLEGATION: "It is alleged that the Finch deficit was incorrectly reported as \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. Sec. 434(b)(12))."

The Governor Cliff Finch Campaign Committee has reported timely all debts of the campaign as compiled by the bookkeeper who was supervised by a certified public accounting firm. The only note obligations known and authorized by the Committee were as follows, to wit:

(a) On May 23, 1978, attached to the 10-day pre-runoff report covering a period of May 23 through June 12, was a letter of disclosure forwarded to the Secretary of the Senate indicating the names of individuals who had signed a letter of guarantee to the Mississippi Bank which was to stand good for payment for the Campaign Committee's telephone bills

Mr. William C. Oldaker
January 15, 1979
Page Three

with South Central Bell Telephone Company should the campaign not pay these bills in full when due. Since the note was not carried by the Bank as an asset and, therefore, since the Committee did not list this on Schedule C, Debts and Obligations, when the guarantee was executed, Mr. Doug Patton advised that this could be construed a potential liability and should be handled by a letter of disclosure. This was accomplished and was always disclosed on each and every report sent to the Secretary of the Senate and filed with the Secretary of State of the State of Mississippi. Copy of the letter of disclosure of May 23, 1978, is attached as Exhibit "C".

(b) On June 14, 1978, a note was executed in the amount of \$20,000.00 payable to the Bank of Flora, Mississippi, with interest at the rate of eight (8) percent and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978. See disclosure letter of July 27, 1978, attached hereto as Exhibit "D".

(c) Open note in the amount of \$50,000.00 was executed June 13, 1978, with interest at the rate of nine (9) percent by the candidate, Governor Cliff Finch, to the Mississippi Bank and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978, and filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi. See copy of Debts and Obligations attached hereto as Exhibit "E".

(d) A note in the amount of \$5,522.00 payable to the First National Bank of Jackson was executed July 14, 1978, bearing interest at nine (9) percent and was disclosed to the Secretary of the Senate on the 30-day report following primary runoff and covered the period July 1 through July 17. A copy of the disclosure filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi is attached and designated Exhibit "F".

The term "Cliff Finch Deficit Fund" were the words utilized in the letter after the Governor's defeat and refers, I am informed, to the deficit that was reflected in the reports that

Mr. William C. Oldaker
January 15, 1979
Page Four

have been previously furnished. No other loans except those mentioned above, copies of the reports which have been attached, are known to the Committee.

The Campaign Committee paid the costs of the solicitation letter which was made appropriately on campaign stationery and Messrs. Clerk, Amis and Pittman did not incur any independent expenditure on their part and nothing was done by them not in conjunction with the Campaign Committee. All expenditures for this letter, cost of paper, etc., has been properly reported in the bookkeeping entries furnished the FEC and the Secretary of State of the State of Mississippi.

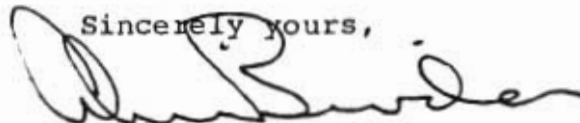
Dr. Howard D. Clark's residence address is 221 Second Street, Morton, Mississippi 39117; Mr. Jesse Mike Amis' address is 2219 Greenbriar, Jackson, Mississippi 39211; and Mr. Benny Pittman's address is 5495 Briarfield Road, Jackson, Mississippi 39211.

Dr. Clark's position in the Senate Campaign was that of treasurer; Mr. Amis' position was that of Chairman of the Campaign Committee; and Mr. Pittman's position in the campaign was that of Chairman of the Finance Committee. These positions were properly noticed on March 31, 1978, and May 24, 1978, filed with the Secretary of State of the State of Mississippi.

We hope that this fully responds to the issues presented and should you desire further information whatsoever, please do not hesitate to communicate same to the undersigned.

With respect, we remain

Sincerely yours,



ALVIN M. BINDER

AMB:ncb

Enclosures

cc Mrs. Susan Donaldson



FEDERAL ELECTION COMMISSION

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

December 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

ref to letter in our report
Investigate & talk to SEC about
with 85% we feel are not proper

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4073.

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,

Witt. T. Oldaker

William C. Oldaker
General Counsel

70040100202

CLIFF FINCH



FOR UNITED STATES SENATE

August 7, 1978

Colonel William Gerald Fisher
2511 Buckner Avenue
Tupelo, Mississippi 38801

Dear William:

YOUR FRIEND, CLIFF FINCH, NEEDS YOUR HELP NOW!

On behalf of our Governor, we would like to express to you his appreciation for your loyalty, support, dedication, and, above all, your friendship. After the last election, Governor Finch called his staff together and asked each member to give rededication to their responsibilities so that even greater services might be rendered to the citizens of the State of Mississippi.

Our campaign has a deficiency in excess of \$100,000 and we must look to our friends to aid and assist in clearing up this campaign debt immediately. We have all agreed that each of us will contribute \$100 or more to the CLIFF FINCH SENATE DEFICIT FUND so that this debt may be reduced and cleared in order that it will not be of concern to the Governor as he continues his efforts for the people. If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100. However, this will not restrict your wife nor family from contributing should they desire to do so.

We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days. Please be sure to complete this receipt in its entirety, keeping the pink copy for your records, before returning it to us. This receipt must be signed.

Governor Finch and his family send their personal regards, best wishes and love to you and your family, who are all our dear friends.

Sincerely,

MIRE ANIS

HOWARD D. CLARK, H.D.

DENNY PITMAN

MA/HDC/BP/js

1045 HIGH STREET JACKSON, MS 39205 PO BOX 22968 PHONE 354 3036

Auto. return to: 1045 High Street, Jackson, MS 39205
For Postage: 1045 High Street, Jackson, MS 39205

Postage provided with this Official Election Communication
Postage from the U.S. Government
Copyright 1978

7 9 0 4 0 1 0 1 0 3 3

CLIFF FINCH



FOR UNITED STATES SENATE

May 23, 1978

Secretary of the Senate
119 "D" Street, N.E.
Washington, D.C. 20510

RE: Disclosure to 10 Day Pre-
Election Report

Sir:

The principal campaign committee wishes to disclose a guarantee agreement in the sum of \$15,000.00 which is to stand good for payment of the campaign committee's telephone bills to South Central Bell Telephone Company should the campaign not pay these bills in full when due.

The undersigned executed a note which may be called upon should the telephone bills not be paid aforesaid. The note is not carried by the bank as an asset and the committee did not list same on Schedule C, Debts and Obligations. When this guarantee was executed, a telephone call was made to Mr. Doug Patton in Washington who advises the committee from time to time, and it was explained that this could be construed as a potential liability and therefore a scrutiny of the signatories below will reflect that none have been allowed to contribute to the campaign.

Joseph David Hamlin
430 Boehle
Pearl, MS 39208

Howard D. Clark, M.D.
221 Second Street
Morton, MS 39117

Nathan Eugene McClintock
156 Glenstone Circle
Jackson, MS 39212

Jesse Mike Amis
2219 Greenbriar Drive
Jackson, MS 39211

B. G. Perry
1840-B Meadowbrook Drive
Jackson, MS 39211

Alvin M. Binder
4320 Deer Creek
Jackson, MS 39211

Thomas L. Wallace
Route 6, Box 89-B
Columbia, MS 39429

W. J. Caraway
1604 Belmont
Jackson, MS 39202

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

*This was attached to the 10-Day
Pre-Runoff Report*

By 1001 May 23 - June 12

Exhibit C

Secretary of the Senate
May 23, 1978
Page 2

Milton York
625 Benning Road
Jackson, MS 39206

Jerry Howie
3509 Old Brandon Road, #3
Pearl, MS 39208

Charley Mac Jones
4311 Old Brandon Road
Jackson, MS 39208

Jackie Clark
221 Second Street
Morton, MS 39117

Donald Travis
3545 Forest Hill Road
Jackson, MS 39212

Norman Harris
6132 Whitestone Road
Jackson, MS 39206

E. C. Lloyd
37 Dickens Court
Jackson, MS 39206

Johnnie Moss Bush
227 Lakebend Circle
Brandon, MS 39042

We disclose this information pursuant to memo in the file that was made after discussion with Mr. Patton on how we should handle this and for your information purposes only.

Sincerely yours,


Howard D. Clark
Treasurer

bjb

7 2 7 1 0 1 0 3 0 7 0

South Central Bell

P. O. Box 2218
221 East Capitol Street
Jackson, Mississippi 39205

July 14, 1978

The Mississippi Bank
P. O. Box 979
Jackson, Mississippi 39205

Dear Mr. Levings:

Enclosed is the bank letter of credit established by The Mississippi Bank for Cliff Finch covering his obligation of payment to South Central Bell during the recent political campaign.

Return of the above mentioned letter cancels The Mississippi Bank's obligation of payment of the telephone service outlined in the original letter of credit.

Sincerely,

Leslie Moore
Leslie Moore
Manager

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 90-day note in the amount of \$20,000.00 payable to the Bank of Flora, Flora, Mississippi:

Beth Stone
Route 3, Box 93-B
Florence, MS 39073

Charlie Graham
Route One
Collins, MS 39428

Kevin Sharpe
6300 Old Canton Road
Jackson, MS 39216

Lanee^t Ashley
3569 Old Brandon Road, Apt. 107
Pearl, MS 39208

Herman Glazier
P. O. Box 368
Rolling Fork, MS 39159

Greg Brand
833 Briarwood Drive
Jackson, MS 39211

Mary Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Charles Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Pat Day
165 Kristen Court
Jackson, MS 39211

Walter Pol
5600 Keele Street, Apt. 1707
Jackson, MS 39206

Bill Kirksey
210 Briarwood, Apt. E-104
Jackson, MS 39206

Dave Hamlin
430 Boehle
Pearl, MS 39208

D

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee
for the United States Senate" Howard D. Clark, M.D. Treasurer

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.

7 9 0 1 0 1 0 2 0 3 2
Secretary of the Senate
Page 2
July 27, 1678

Joe Stone
Route 3, Box 93-B
Florence, MS 39073

Wayne Lester
208 Bruce
Batesville, MS 38606

Ron Boutwell
Route One
Tupelo, MS 38801

Don Travis
3545 Forest Hill Road
Jackson, MS 39212

Mike Chrestman
337 Stonecastle
Jackson, MS 39208

Cathy Chrestman
337 Stonecastle
Jackson, MS 39208

Marsha Hilliard
621 Briarcliff Circle
Jackson, MS 39212

Mrs. Jerry Howie
3569 Old Brandon Road, Apt. 3
Pearl, MS 39208

This note, with interest at the rate of 8%, is due in full October 12, 1978.

Sincerely,


HOWARD D. CLARK, M. D.
TREASURER

HDC/js

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 1 of 13 for
Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full
GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE UNITED STATES SENATE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071	07-14-78	20,000.00		*341.92
☒ Primary ☐ General ☐ Other	09-30-78	\$ 20,000.00	\$ 3,000.00	\$ 17,000.00

NATURE OF OBLIGATION (Details of Debt):

*Accrued interest. Open note executed on July 14, 1978, in the amount of \$20,000 payable to the Bank of Flora with interest at the rate of 8%. (Disclosure of loan reported in period of occurrence, 07/01 - 07/17)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Internal Revenue Service Stop 13-A Atlanta, Ga 31101				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 1,169.23	\$ 20,027.14	\$ 1,169.23

NATURE OF OBLIGATION (Details of Debt):

Payroll withholdings and taxes for the reporting period.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
The Mississippi Bank Box 979 Jackson, MS 39205				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 50,000.00	\$ -0-	*150.00 \$ 50,000.00

NATURE OF OBLIGATION (Details of Debt):

*accrued interest.
Open note in the amount of \$50,000 executed on June 13, 1978, with interest at the rate of 9%, due in full December 9, 1978. Note based on financial statement on Governor Cliff Finch. (Disclosure of loan reported in period of occurrence)

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$

Carry outstanding balance only to appropriate line of summary

*These were included in the October 10
Quarterly Report for the period July 18-
Sept. 30, 1978.*

CLARK FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 30-day note in the amount of \$5,522.00 payable to the First National Bank of Jackson, Jackson, Mississippi:

Latrelle Ashley
3569 Old Brandon Road
Apt. 107
Pearl, MS 39208

Warren Emfinger
General Delivery
Mount Olive, MS 39119

Alvin M. Binder
4320 Deer Creek Drive
Jackson, MS 39205

Anita Day
165 Kristen Court
Jackson, MS 39211

Kimsey K. Lawrence, Jr.
1000 Lakeshore Drive, Box 70
Brandon, MS 39042

Charles Jackson
4929 Oak Leaf Drive
Jackson, MS 39212

This note, with interest at the rate of 9%, is due in full August 14, 1978.

Sincerely,

HOWARD D. CLARK, M. D.
TREASURER

HDC/js

1045 HIGH STREET • JACKSON, MS 39205 • P.O. BOX 22968 • PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee for the United States Senate." Howard D. Clark, M.D. Treasurer.

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.

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 1 of 7 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U. S. SENATE				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
The Honorable Cliff Finch Governor of Ms. 20th Floor, Walter Sillers Bldg. Jackson, MS 39205				
☒ Primary ☐ General ☐ Other	06-13-78	\$50,000.00	\$ -0-	\$ 50,000.00
NATURE OF OBLIGATION (Details of Debt): On 06-13-78, received \$50,000 open note at 9% interest based on financial statement of Gov. Finch. Payment due in full on December 9, 1978.				
Internal Revenue Service Stop 13A Atlanta, Ga. 31101				
☒ Primary ☐ General ☐ Other	06-26-78	\$ 430.31	\$ 12,378.52	\$430.31
NATURE OF OBLIGATION (Details of Debt): Payroll withholdings for reporting period.				
Telecom P. O. Box 16892 Jackson, MS 39206				
☒ Primary ☐ General ☐ Other	06-16-78	\$770.00	\$ -0-	\$770.00
NATURE OF OBLIGATION (Details of Debt): Consultation services and creative writing, location videotaping/equipment and crew, master tape re televiaion spots for Mrs. Cliff Finch.				
SUBTOTALS this period this page (optional)		\$	\$	\$51,200.31
TOTAL this period (last page this line number only)		\$	\$	\$
Carry outstanding balance only to appropriate line of summary.				

*This was included in the 30-Day Primary Report
for the period: June 13 - June 26*

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 8 of 13 for
Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Governor Cliff Finch Campaign Committee for the United States Senate

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 20,000.00	\$ -0-	\$ 20,000.00

NATURE OF OBLIGATION (Details of Debt):

Ninety-day note at the rate of 8% interest due in full October 12, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
First National Bank of Jackson Box 291 Jackson, MS 39205				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 5,522.00	\$ -0-	\$ 5,522.00

NATURE OF OBLIGATION (Details of Debt):

Thirty-day note at the rate of 9% interest due in full August 14, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Jimmy Cagle Rt. 7, Box 332 Columbia, MS 39429	06-17-78 06-24-78	1,878.83 1,848.31		
☒ Primary ☐ General ☐ Other		\$	\$ 5,250.77	\$ 3,727.14

NATURE OF OBLIGATION (Details of Debt):

Aircraft rental

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$

Carry outstanding balance only to appropriate line of summary.

*The note was repaid on the 30-day
paper bearing interest and covered the
first day 1 month only*



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alvin M. Binder, Esquire
Binder, Moore, and Howell
511 East Pearl Street
Jackson, Mississippi 39205

Re: MUR 813-Governor Cliff
Finch for U.S. Senate
Campaign Committee

Dear Mr. Binder:

This letter will confirm the Commission's receipt of your letter, dated January 15, 1979, in connection with your client, the Governor Cliff Finch for U.S. Senate Campaign Committee. After reviewing your letter, the Commission determined, on , 1979 to find no reasonable cause to believe that your client violated 2 U.S.C. § 441f and 2 U.S.C. § 434(b)(12). Accordingly, the Commission has closed its file on this matter.

Should you have any further questions, please call Susan Donaldson at (202) 523-4073.

Sincerely,

William C. Oldaker
General Counsel

79010102037

ALVIN M. BINDER
RUSSELL D. MOORE, III
WILLIAM B. HOWELL
WILLIAM B. KIRKSEY
BOBBY B. DeLAUGHTER

BINDER, MOORE & HOWELL
IN EAST PEARL STREET
JACKSON, MISSISSIPPI 39206

January 15, 1979

RECEIVED
FEDERAL ELECTION
COMMISSION

79 JAN 19 2:32

MILLARD M. BUSH (1968)
TELEPHONE
548-8400
AREA CODE 601

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

Re: MUR 813

Dear Mr. Oldaker:

On January 12, 1979, at approximately 10:00 a.m. Dr. Howard D. Clark received a letter from you under date of December 7, 1978. He promptly telephoned me and sent a copy of the letter to me which we received the morning of January 13, 1979. This morning I telephoned Mrs. Susan Donaldson to tell her of our receipt of the letter and our response. A copy of your letter is attached hereto as Exhibit "A".

I wish to advise that I will represent Dr. Howard D. Clark, Mr. Mike Amis and Mr. Benny Pittman in response to the matters complained of.

FIRST ALLEGATION: "It is alleged that you, Mike Amis and Benny Pittman, sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election Law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C., Sec. 441f)."

The allegation is denied by Messrs. Clark, Amis and Pittman as being inaccurate and not at all correct.

The Governor of Mississippi did not receive the democratic endorsement in his Senate race and as the records will reflect he had a deficit in excess of \$100,000.00 reported to the Federal Election Commission and filed appropriately with the Secretary of State of the State of Mississippi and with the Federal Election Commission.

79040102038

Mr. William C. Clinker
January 15, 1979
Page Two

A letter was mailed by the named individuals in the alleged complaint; however, the letter does not state that if one had contributed the maximum amount then that person could contribute in the name of his wife or children. The appropriate part of the letter that is relevant states as follows:

"If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100.00. However, this will not restrict your wife nor family from contributing should they desire to do so.

"We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days."

This letter containing the above statement is attached hereto as Exhibit "B".

The letter speaks for itself and does not in any manner imply what has been alleged.

SECOND ALLEGATION: "It is alleged that the Finch deficit was incorrectly reported as \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. Sec. 434(b)(12))."

The Governor Cliff Finch Campaign Committee has reported timely all debts of the campaign as compiled by the bookkeeper who was supervised by a certified public accounting firm. The only note obligations known and authorized by the Committee were as follows, to wit:

(a) On May 23, 1978, attached to the 10-day pre-runoff report covering a period of May 23 through June 12, was a letter of disclosure forwarded to the Secretary of the Senate indicating the names of individuals who had signed a letter of guarantee to the Mississippi Bank which was to stand good for payment for the Campaign Committee's telephone bills

79040102039

Mr. William C. Oldaker
January 15, 1979
Page Three

79040102040

with South Central Bell Telephone Company should the campaign not pay these bills in full when due. Since the note was not carried by the Bank as an asset and, therefore, since the Committee did not list this on Schedule C, Debts and Obligations, when the guarantee was executed, Mr. Doug Patton advised that this could be construed a potential liability and should be handled by a letter of disclosure. This was accomplished and was always disclosed on each and every report sent to the Secretary of the Senate and filed with the Secretary of State of the State of Mississippi. Copy of the letter of disclosure of May 23, 1978, is attached as Exhibit "C".

(b) On June 14, 1978, a note was executed in the amount of \$20,000.00 payable to the Bank of Flora, Mississippi, with interest at the rate of eight (8) percent and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978. See disclosure letter of July 27, 1978, attached hereto as Exhibit "D".

(c) Open note in the amount of \$50,000.00 was executed June 13, 1978, with interest at the rate of nine (9) percent by the candidate, Governor Cliff Finch, to the Mississippi Bank and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978, and filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi. See copy of Debts and Obligations attached hereto as Exhibit "E".

(d) A note in the amount of \$5,522.00 payable to the First National Bank of Jackson was executed July 14, 1978, bearing interest at nine (9) percent and was disclosed to the Secretary of the Senate on the 30-day report following primary runoff and covered the period July 1 through July 17. A copy of the disclosure filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi is attached and designated Exhibit "F".

The term "Cliff Finch Deficit Fund" were the words utilized in the letter after the Governor's defeat and refers, I am informed, to the deficit that was reflected in the reports that

79040102041

Mr. William C. Oldaker
January 15, 1979
Page Four

have been previously furnished. No other loans except those mentioned above, copies of the reports which have been attached, are known to the Committee.

The Campaign Committee paid the costs of the solicitation letter which was made appropriately on campaign stationery and Messrs. Clerk, Amis and Pittman did not incur any independent expenditure on their part and nothing was done by them not in conjunction with the Campaign Committee. All expenditures for this letter, cost of paper, etc., has been properly reported in the bookkeeping entries furnished the FEC and the Secretary of State of the State of Mississippi.

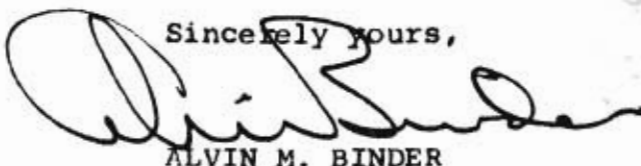
Dr. Howard D. Clark's residence address is 221 Second Street, Morton, Mississippi 39117; Mr. Jesse Mike Amis' address is 2219 Greenbriar, Jackson, Mississippi 39211; and Mr. Benny Pittman's address is 5495 Briarfield Road, Jackson, Mississippi 39211.

Dr. Clark's position in the Senate Campaign was that of treasurer; Mr. Amis' position was that of Chairman of the Campaign Committee; and Mr. Pittman's position in the campaign was that of Chairman of the Finance Committee. These positions were properly noticed on March 31, 1978, and May 24, 1978, filed with the Secretary of State of the State of Mississippi.

We hope that this fully responds to the issues presented and should you desire further information whatsoever, please do not hesitate to communicate same to the undersigned.

With respect, we remain

Sincerely yours,



ALVIN M. BINDER

AMB:ncb

Enclosures

cc Mrs. Susan Donaldson



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

December 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

ref to letter in our report
investigate, I call to SEC about
plaintiff's letter, we feel we will prove

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4073.

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,

Witt. T. Oldaker

William C. Oldaker
General Counsel

79040102043

CLIFF FINCH



FOR
UNITED STATES
SENATE

August 7, 1978

Colonel William Gerald Fisher
2511 Buckner Avenue
Tupelo, Mississippi 38801

Dear William:

YOUR FRIEND, CLIFF FINCH, NEEDS YOUR HELP NOW!

On behalf of our Governor, we would like to express to you his appreciation for your loyalty, support, dedication, and, above all, your friendship. After the last election, Governor Finch called his staff together and asked each member to give rededication to their responsibilities so that even greater services might be rendered to the citizens of the State of Mississippi.

Our campaign has a deficiency in excess of \$100,000 and we must look to our friends to aid and assist in clearing up this campaign debt immediately. We have all agreed that each of us will contribute \$100 or more to the CLIFF FINCH SENATE DEFICIT FUND so that this debt may be reduced and cleared in order that it will not be of concern to the Governor as he continues his efforts for the people. If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100. However, this will not restrict your wife nor family from contributing should they desire to do so.

We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days. Please be sure to complete this receipt in its entirety, keeping the pink copy for your records, before returning it to us. This receipt must be signed.

Governor Finch and his family send their personal regards, best wishes and love to you and your family, who are all our dear friends.

Sincerely,

MIKE AMIS

HOWARD D. CLARK, M.D.

BENNY FITZMA

MA/HDC/BP/js

1045 HIGH STREET JACKSON, MS 39205 P.O. BOX 22968 PHONE 354-3636

Authorized and paid for by: Governor's Office, Campaign Committee
Not to be used for any other purpose

Approved for filing with the Federal Election Commission
and transmission to the Federal Election Commission

Washington, D.C.

CLIFF FINCH



FOR
UNITED STATES
SENATE

May 23, 1978

Secretary of the Senate
119 "D" Street, N.E.
Washington, D.C. 20510

RE: Disclosure to 10 Day Pre-
Election Report

Sir:

The principal campaign committee wishes to disclose a guarantee agreement in the sum of \$15,000.00 which is to stand good for payment of the campaign committee's telephone bills to South Central Bell Telephone Company should the campaign not pay these bills in full when due.

The undersigned executed a note which may be called upon should the telephone bills not be paid aforesaid. The note is not carried by the bank as an asset and the committee did not list same on Schedule C, Debts and Obligations. When this guarantee was executed, a telephone call was made to Mr. Doug Patton in Washington who advises the committee from time to time, and it was explained that this could be construed as a potential liability and therefore a scrutiny of the signatories below will reflect that none have been allowed to contribute to the campaign.

Joseph David Hamlin
430 Boehle
Pearl, MS 39208

Howard D. Clark, M.D.
221 Second Street
Morton, MS 39117

Nathan Eugene McClintock
156 Glenstone Circle
Jackson, MS 39212

Jesse Mike Amis
2219 Greenbriar Drive
Jackson, MS 39211

B. G. Perry
1840-B Meadowbrook Drive
Jackson, MS 39211

Alvin M. Binder
4320 Deer Creek
Jackson, MS 39211

Thomas L. Wallace
Route 6, Box 89-B
Columbia, MS 39429

W. J. Caraway
1604 Belmont
Jackson, MS 39202

1045 HIGH STREET • JACKSON, MS 39205 • PO. BOX 22968 • PHONE 354-3636

*This was attached to the 10-Day
Pre-Runoff Report*

U.S. Supp. 11 May 23 - June 12

EXHIBIT C

Secretary of the Senate
May 23, 1978
Page 2

Milton York
625 Benning Road
Jackson, MS 39206

Jerry Howie
3569 Old Brandon Road, #3
Pearl, MS 39208

Charley Mac Jones
4311 Old Brandon Road
Jackson, MS 39208

Jackie Clark
221 Second Street
Morton, MS 39117

Donald Travis
3545 Forest Hill Road
Jackson, MS 39212

Norman Harris
6132 Whitestone Road
Jackson, MS 39206

E. C. Lloyd
37 Dickens Court
Jackson, MS 39206

Johnnie Moss Bush
227 Lakebend Circle
Brandon, MS 39042

We disclose this information pursuant to memo in the file that was made after discussion with Mr. Patton on how we should handle this and for your information purposes only.

Sincerely yours,


Howard D. Clark
Treasurer

bjb

7 9 0 4 0 1 0 2 0 4 7

THE
MISSISSIPPI BANK
POST OFFICE BOX 978, JACKSON, MISSISSIPPI 39205

March 30, 1978

SANFORD H. LEVINGS
VICE PRESIDENT

South Central Bell
P. O. Box 811
Jackson, Mississippi 39205

Attention: Ms. Marie Murphy

Dear Ms. Murphy:

The Mississippi Bank, Jackson, Mississippi, guaranties payment to South Central Bell on all charges, up to \$15,000, for telephone service provided to Governor Cliff Finch and billed to the following account numbers.

354-3636
354-3637
354-3640
354-3641

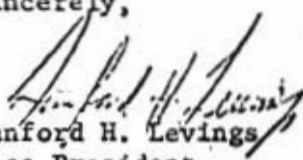
and on the following Wats numbers -

060-0504 (W 31-3099)
060-0507 (W 31-3100)
800-682-6421 (W 31-3098)

Should Governor Finch default in payment of these accounts prior to April 1, 1979, and upon presentation of the bills to us, The Mississippi Bank agrees to pay all charges, up to \$15,000, to South Central Bell immediately upon demand.

This agreement expires on April 1, 1979, and shall not be voided prior to that time, except by the mutual consent of The Mississippi Bank and South Central Bell.

Sincerely,


Sanford H. Levings
Vice President

SHL/mw

South Central Bell

P. O. Box 2218
221 East Capitol Street
Jackson, Mississippi 39205

July 14, 1978

The Mississippi Bank
P. O. Box 979
Jackson, Mississippi 39205

Dear Mr. Levings:

Enclosed is the bank letter of credit established by The Mississippi Bank for Cliff Finch covering his obligation of payment to South Central Bell during the recent political campaign.

Return of the above mentioned letter cancels The Mississippi Bank's obligation of payment of the telephone service outlined in the original letter of credit.

Sincerely,

Leslie Moore
Leslie Moore
Manager

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 90-day note in the amount of \$20,000.00 payable to the Bank of Flora, Flora, Mississippi:

Beth Stone
Route 3, Box 93-B
Florence, MS 39073

Kevin Sharpe
6300 Old Canton Road
Jackson, MS 39216

Herman Glazier
P. O. Box 368
Rolling Fork, MS 39159

Mary Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Pat Day
165 Kristen Court
Jackson, MS 39211

Bill Kirksey
210 Briarwood, Apt. E-104
Jackson, MS 39206

Charlie Graham
Route One
Collins, MS 39428

Lanee' Ashley
3569 Old Brandon Road, Apt. 107
Pearl, MS 39208

Greg Brand
833 Briarwood Drive
Jackson, MS 39211

Charles Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Walter Pol
5600 Keele Street, Apt. 1707
Jackson, MS 39206

Dave Hamlin
430 Boehle
Pearl, MS 39208

D

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee
for the United States Senate" Howard D. Clark, M.D. Treasurer

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.

Secretary of the Senate
Page 2
July 27, 1978

Joe Stone
Route 3, Box 93-B
Florence, MS 39073

Ron Boutwell
Route One
Tupelo, MS 38801

Mike Chrestman
337 Stonecastle
Jackson, MS 39208

Marsha Hilliard
621 Briarcliff Circle
Jackson, MS 39212

Wayne Lester
208 Bruce
Batesville, MS 38606

Don Travis
3545 Forest Hill Road
Jackson, MS 39212

Cathy Chrestman
337 Stonecastle
Jackson, MS 39208

Mrs. Jerry Howie
3569 Old Brandon Road, Apt. 3
Pearl, MS 39208

This note, with interest at the rate of 8%, is due in full October 12, 1978.

Sincerely,


HOWARD D. CLARK, M. D.
TREASURER

HDC/js

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 13 for

Line Number 13

(Use Separate Schedules for
each numbered line)

Name of Candidate and Committee in Full
GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE UNITED STATES SENATE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071	07-14-78	20,000.00		*341.92
☐ Primary ☐ General ☐ Other	09-30-78	\$ 20,000.00	\$ 3,000.00	\$ 17,000.00

NATURE OF OBLIGATION (Details of Debt)

*Accrued interest. Open note executed on July 14, 1978, in the amount of \$20,000 payable to the Bank of Flora with interest at the rate of 8%. (Disclosure of loan reported in period of occurrence, 07/01 - 07/17)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
Internal Revenue Service Stop 13-A Atlanta, Ga 31101				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 1,169.23	\$ 20,027.14	\$ 1,169.23

NATURE OF OBLIGATION (Details of Debt)

Payroll withholdings and taxes for the reporting period.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payments To Date	Outstanding Balance at Close of This Period
The Mississippi Bank Box 979 Jackson, MS 39205				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 50,000.00	\$ -0-	*150.00 \$ 50,000.00

NATURE OF OBLIGATION (Details of Debt)

*accrued interest.
Open note in the amount of \$50,000 executed on June 13, 1978, with interest at the rate of 9%, due in full December 9, 1978. Note based on financial statement on Governor Cliff Finch. (Disclosure of loan reported in period of occurrence)

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$

Carry outstanding balance only to appropriate line of summary

*These were included in the October 10
Quarterly Report for the period July 18-
Sept. 30, 1978.*

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 30-day note in the amount of \$5,522.00 payable to the First National Bank of Jackson, Jackson, Mississippi:

Latrelle Ashley
3569 Old Brandon Road
Apt. 107
Pearl, MS 39208

Warren Emfinger
General Delivery
Mount Olive, MS 39119

Alvin M. Binder
4320 Deer Creek Drive
Jackson, MS 39205

Anita Day
165 Kristen Court
Jackson, MS 39211

Kimsey K. Lawrence, Jr.
1000 Lakeshore Drive, Box 70
Brandon, MS 39042

Charles Jackson
4929 Oak Leaf Drive
Jackson, MS 39212

This note, with interest at the rate of 9%, is due in full August 14, 1978.

Sincerely,

HOWARD D. CLARK, M. D.
TREASURER

HDC/js

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee for the United States Senate." Howard D. Clark, M.D. Treasurer.

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.

7 9 0 4 0 1 0 2 0 5 3

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
 of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 7 for

Line Number 13

(Use Separate Schedules for
 each numbered line)

Name of Candidate and Committee in Full

GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U. S. SENATE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
 The Honorable Cliff Finch
 Governor of Ms.
 20th Floor, Walter Sillers Bldg.
 Jackson, MS 39205

Date (month,
 day, year)

Amount of Original
 Debt, Contract,
 Agreement or
 Promise

Cumulative
 Payment
 To Date

Outstanding
 Balance at
 Close of
 This Period

☒ Primary

☐ General

☐ Other

06-13-78

\$50,000.00

\$ -0-

\$ 50,000.00

NATURE OF OBLIGATION (Details of Debt):

On 06-13-78, received \$50,000 open note at 9% interest based on financial statement of Gov. Finch. Payment due in full on December 9, 1978.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
 Internal Revenue Service
 Stop 13A
 Atlanta, Ga. 31101

Date (month,
 day, year)

Amount of Original
 Debt, Contract,
 Agreement or
 Promise

Cumulative
 Payment
 To Date

Outstanding
 Balance at
 Close of
 This Period

☒ Primary

☐ General

☐ Other

06-26-78

\$ 430.31

\$ 12,378.52

\$430.31

NATURE OF OBLIGATION (Details of Debt):

Payroll withholdings for reporting period.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
 Telecom
 P. O. Box 16892
 Jackson, MS 39206

Date (month,
 day, year)

Amount of Original
 Debt, Contract,
 Agreement or
 Promise

Cumulative
 Payment
 To Date

Outstanding
 Balance at
 Close of
 This Period

☒ Primary

☐ General

☐ Other

06-16-78

\$770.00

\$ -0-

\$770.00

NATURE OF OBLIGATION (Details of Debt):

Consultation services and creative writing, location videotaping/equipment and crew, master tape re television spots for Mrs. Cliff Finch.

SUBTOTALS this period this page (optional)

\$

\$

\$51,200.31

TOTAL this period (last page this line number only)

\$

\$

\$

Carry outstanding balance only to appropriate line of summary.

*This was included in the 30-Day Primary Report
 for the period: June 13 - June 26*

7 9 0 4 0 1 0 2 0 5 4

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 8 of 13 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Governor Cliff Finch Campaign Committee for the United States Senate

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 20,000.00	\$ -0-	\$ 20,000.00
NATURE OF OBLIGATION (Details of Debt): Ninety-day note at the rate of 8% interest due in full October 12, 1978. (See attachment to report for further details)				
First National Bank of Jackson Box 291 Jackson, MS 39205				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 5,522.00	\$ -0-	\$ 5,522.00
NATURE OF OBLIGATION (Details of Debt): Thirty-day note at the rate of 9% interest due in full August 14, 1978. (See attachment to report for further details)				
Jimmy Cagle Rt. 7, Box 332 Columbia, MS 39429	06-17-78 06-24-78	1,878.83 1,848.31		
☒ Primary ☐ General ☐ Other		\$	\$ 5,250.77	\$ 3,727.14
NATURE OF OBLIGATION (Details of Debt): Aircraft rental				
SUBTOTALS this period this page (optional)		\$	\$	\$
TOTAL this period (last page this line number only).		\$	\$	\$
Carry outstanding balance only to appropriate line of summary.				

*These note were repaid on the 30-day
Paper following primary June 28 and covered the
period July 1 through July 17*

7 9 0 4 0 1 0 2 0 5 5

LAW OFFICES
BINDER, MOORE & HOWELL
511 EAST PEARL STREET
P. O. BOX 25
JACKSON, MISSISSIPPI 39205

JAN 7
MISS
REGISTER
1117248

MS. SUSAN DONALDSON
FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463

CERTIFIED
No. 61-3153
MAIL

79 JUN 19 PM 2:32

RECEIVED
FEDERAL ELECTION COMMISSION

900 908d

LAW OFFICES

BINDER, MOORE & HOWELL

511 EAST PEARL STREET

P. O. BOX 28

JACKSON, MISSISSIPPI 39205

January 15, 1979

79 JAN 16 PM 2:13

ALVIN M. BINDER
RUSSELL D. MOORE, III
WILLIAM B. HOWELL
WILLIAM B. KIRKSEY
BOBBY B. DeLAUGHTER

MILLARD M. BUSH (1968)
TELEPHONE
948-8800
AREA CODE 601

900313

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

Re: MUR 813

Dear Mr. Oldaker:

On January 12, 1979, at approximately 10:00 a.m. Dr. Howard D. Clark received a letter from you under date of December 7, 1978. He promptly telephoned me and sent a copy of the letter to me which we received the morning of January 13, 1979. This morning I telephoned Mrs. Susan Donaldson to tell her of our receipt of the letter and our response. A copy of your letter is attached hereto as Exhibit "A".

I wish to advise that I will represent Dr. Howard D. Clark, Mr. Mike Amis and Mr. Benny Pittman in response to the matters complained of.

FIRST ALLEGATION: "It is alleged that you, Mike Amis and Benny Pittman, sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election Law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C., Sec. 441f)."

The allegation is denied by Messrs. Clark, Amis and Pittman as being inaccurate and not at all correct.

The Governor of Mississippi did not receive the democratic endorsement in his Senate race and as the records will reflect he had a deficit in excess of \$100,000.00 reported to the Federal Election Commission and filed appropriately with the Secretary of State of the State of Mississippi and with the Federal Election Commission.

79010102035

7 9 0 1 0 2 0 5 7

Mr. William C. Oldaker
January 15, 1979
Page Two

A letter was mailed by the named individuals in the alleged complaint; however, the letter does not state that if one had contributed the maximum amount then that person could contribute in the name of his wife or children. The appropriate part of the letter that is relevant states as follows:

"If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100.00. However, this will not restrict your wife nor family from contributing should they desire to do so.

"We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days."

This letter containing the above statement is attached hereto as Exhibit "B".

The letter speaks for itself and does not in any manner imply what has been alleged.

SECOND ALLEGATION: "It is alleged that the Finch deficit was incorrectly reported as \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. Sec. 434(b)(12))."

The Governor Cliff Finch Campaign Committee has reported timely all debts of the campaign as compiled by the bookkeeper who was supervised by a certified public accounting firm. The only note obligations known and authorized by the Committee were as follows, to wit:

(a) On May 23, 1978, attached to the 10-day pre-runoff report covering a period of May 23 through June 12, was a letter of disclosure forwarded to the Secretary of the Senate indicating the names of individuals who had signed a letter of guarantee to the Mississippi Bank which was to stand good for payment for the Campaign Committee's telephone bills

Mr. William C. Oldaker
January 15, 1979
Page Three

with South Central Bell Telephone Company should the campaign not pay these bills in full when due. Since the note was not carried by the Bank as an asset and, therefore, since the Committee did not list this on Schedule C, Debts and Obligations, when the guarantee was executed, Mr. Doug Patton advised that this could be construed a potential liability and should be handled by a letter of disclosure. This was accomplished and was always disclosed on each and every report sent to the Secretary of the Senate and filed with the Secretary of State of the State of Mississippi. Copy of the letter of disclosure of May 23, 1978, is attached as Exhibit "C".

(b) On June 14, 1978, a note was executed in the amount of \$20,000.00 payable to the Bank of Flora, Mississippi, with interest at the rate of eight (8) percent and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978. See disclosure letter of July 27, 1978, attached hereto as Exhibit "D".

(c) Open note in the amount of \$50,000.00 was executed June 13, 1978, with interest at the rate of nine (9) percent by the candidate, Governor Cliff Finch, to the Mississippi Bank and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978, and filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi. See copy of Debts and Obligations attached hereto as Exhibit "E".

(d) A note in the amount of \$5,522.00 payable to the First National Bank of Jackson was executed July 14, 1978, bearing interest at nine (9) percent and was disclosed to the Secretary of the Senate on the 30-day report following primary runoff and covered the period July 1 through July 17. A copy of the disclosure filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi is attached and designated Exhibit "F".

The term "Cliff Finch Deficit Fund" were the words utilized in the letter after the Governor's defeat and refers, I am informed, to the deficit that was reflected in the reports that

Mr. William C. Oldaker
January 15, 1979
Page Four

have been previously furnished. No other loans except those mentioned above, copies of the reports which have been attached, are known to the Committee.

The Campaign Committee paid the costs of the solicitation letter which was made appropriately on campaign stationery and Messrs. Clerk, Amis and Pittman did not incur any independent expenditure on their part and nothing was done by them not in conjunction with the Campaign Committee. All expenditures for this letter, cost of paper, etc., has been properly reported in the bookkeeping entries furnished the FEC and the Secretary of State of the State of Mississippi.

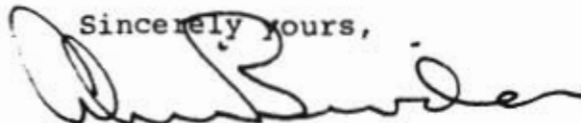
Dr. Howard D. Clark's residence address is 221 Second Street, Morton, Mississippi 39117; Mr. Jesse Mike Amis' address is 2219 Greenbriar, Jackson, Mississippi 39211; and Mr. Benny Pittman's address is 5495 Briarfield Road, Jackson, Mississippi 39211.

Dr. Clark's position in the Senate Campaign was that of treasurer; Mr. Amis' position was that of Chairman of the Campaign Committee; and Mr. Pittman's position in the campaign was that of Chairman of the Finance Committee. These positions were properly noticed on March 31, 1978, and May 24, 1978, filed with the Secretary of State of the State of Mississippi.

We hope that this fully responds to the issues presented and should you desire further information whatsoever, please do not hesitate to communicate same to the undersigned.

With respect, we remain

Sincerely yours,



ALVIN M. BINDER

AMB:ncb

Enclosures

cc Mrs. Susan Donaldson



FEDERAL ELECTION COMMISSION

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

December 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard B. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

ref to letter in our report
Investigate, I talk to SEC about
about 200,000 we please not pay

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amir and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4073.

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,

Witt. I. Oldaker

William C. Oldaker
General Counsel

79040102061

EX-100
Q1P34 PO
20610

CLIFF FINCH



FOR UNITED STATES SENATE

August 7, 1978

Colonel William Gerald Fisher
2511 Buckner Avenue
Tupelo, Mississippi 38801

Dear William:

YOUR FRIEND, CLIFF FINCH, NEEDS YOUR HELP NOW!

On behalf of our Governor, we would like to express to you his appreciation for your loyalty, support, dedication, and, above all, your friendship. After the last election, Governor Finch called his staff together and asked each member to give rededication to their responsibilities so that even greater services might be rendered to the citizens of the State of Mississippi.

Our campaign has a deficiency in excess of \$100,000 and we must look to our friends to aid and assist in clearing up this campaign debt immediately. We have all agreed that each of us will contribute \$100 or more to the CLIFF FINCH SENATE DEFICIT FUND so that this debt may be reduced and cleared in order that it will not be of concern to the Governor as he continues his efforts for the people. If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100. However, this will not restrict your wife nor family from contributing should they desire to do so.

We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days. Please be sure to complete this receipt in its entirety, keeping the pink copy for your records, before returning it to us. This receipt must be signed.

Governor Finch and his family send their personal regards, best wishes and love to you and your family, who are all our dear friends.

Sincerely,

MIKE AMIS

HOWARD D. CLARK, M.D.

DENNY PITTMAN

MA/HDC/BP/js

1045 HIGH STREET · JACKSON, MS 39205 · PO BOX 22968 · PHONE 354-3636

Authorized by the Federal Election Commission

This receipt is filed with the Federal Election Commission
Washington, D.C.

CLIFF FINCH



FOR
UNITED STATES
SENATE

May 23, 1978

Secretary of the Senate
119 "D" Street, N.E.
Washington, D.C. 20510

RE: Disclosure to 10 Day Pre-
Election Report

Sir:

The principal campaign committee wishes to disclose a guarantee agreement in the sum of \$15,000.00 which is to stand good for payment of the campaign committee's telephone bills to South Central Bell Telephone Company should the campaign not pay these bills in full when due.

The undersigned executed a note which may be called upon should the telephone bills not be paid aforesaid. The note is not carried by the bank as an asset and the committee did not list same on Schedule C, Debts and Obligations. When this guarantee was executed, a telephone call was made to Mr. Doug Patton in Washington who advises the committee from time to time, and it was explained that this could be construed as a potential liability and therefore a scrutiny of the signatories below will reflect that none have been allowed to contribute to the campaign.

Joseph David Hamlin
430 Boehle
Pearl, MS 39208

Howard D. Clark, M.D.
221 Second Street
Morton, MS 39117

Nathan Eugene McClintock
156 Glenstone Circle
Jackson, MS 39212

Jesse Mike Amis
2219 Greenbriar Drive
Jackson, MS 39211

B. G. Perry
1840-B Meadowbrook Drive
Jackson, MS 39211

Alvin M. Binder
4320 Deer Creek
Jackson, MS 39211

Thomas L. Wallace
Route 6, Box 89-B
Columbia, MS 39429

W. J. Caraway
1604 Belmont
Jackson, MS 39202

1045 HIGH STREET JACKSON, MS 39205 • P.O. BOX 22968 • PHONE 354-3636

*This was attached to the 10-Day
Pre-Runoff Report*

Wm. J. Caraway - June 12

Exhibit C

Secretary of the Senate
May 23, 1978
Page 2

Milton York
625 Benning Road
Jackson, MS 39206

Jerry Howie
3569 Old Brandon Road, #3
Pearl, MS 39208

Charley Mac Jones
4311 Old Brandon Road
Jackson, MS 39208

Jackie Clark
221 Second Street
Morton, MS 39117

Donald Travis
3545 Forest Hill Road
Jackson, MS 39212

Norman Harris
6132 Whitestone Road
Jackson, MS 39206

E. C. Lloyd
37 Dickens Court
Jackson, MS 39206

Johnnie Moss Bush
227 Lakebend Circle
Brandon, MS 39042

We disclose this information pursuant to memo in the file that was made after discussion with Mr. Patton on how we should handle this and for your information purposes only.

Sincerely yours,


Howard D. Clark
Treasurer

bjb

South Central Bell

P. O. Box 2218
221 East Capitol Street
Jackson, Mississippi 39205

July 14, 1978

The Mississippi Bank
P. O. Box 979
Jackson, Mississippi 39205

Dear Mr. Levings:

Enclosed is the bank letter of credit established by The Mississippi Bank for Cliff Finch covering his obligation of payment to South Central Bell during the recent political campaign.

Return of the above mentioned letter cancels The Mississippi Bank's obligation of payment of the telephone service outlined in the original letter of credit.

Sincerely,

Leslie Moore
Leslie Moore
Manager

THE
MISSISSIPPI BANK
POST OFFICE BOX 979, JACKSON, MISSISSIPPI 39208

March 30, 1978

SANFORD H. LEVINGS
VICE PRESIDENT

South Central Bell
P. O. Box 811
Jackson, Mississippi 39205

Attention: Ms. Marie Murphy

Dear Ms. Murphy:

The Mississippi Bank, Jackson, Mississippi, guaranties payment to South Central Bell on all charges, up to \$15,000, for telephone service provided to Governor Cliff Finch and billed to the following account numbers.

354-3636
354-3637
354-3640
354-3641

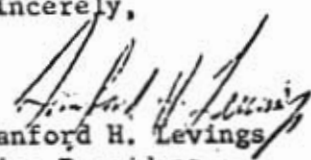
and on the following Wats numbers -

060-0504 (W 31-3099)
060-0507 (W 31-3100)
800-682-6421 (W 31-3098)

Should Governor Finch default in payment of these accounts prior to April 1, 1979, and upon presentation of the bills to us, The Mississippi Bank agrees to pay all charges, up to \$15,000, to South Central Bell immediately upon demand.

This agreement expires on April 1, 1979, and shall not be voided prior to that time, except by the mutual consent of The Mississippi Bank and South Central Bell.

Sincerely,


Sanford H. Levings
Vice President

SHL/mw

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of loan

On July 14, 1978, the undersigned executed a 90-day note in the amount of \$20,000.00 payable to the Bank of Flora, Flora, Mississippi:

Beth Stone
Route 3, Box 93-B
Florence, MS 39073

Charlie Graham
Route One
Collins, MS 39428

Kevin Sharpe
6300 Old Canton Road
Jackson, MS 39216

Lanee¹ Ashley
3569 Old Brandon Road, Apt. 107
Pearl, MS 39208

Herman Glazier
P. O. Box 368
Rolling Fork, MS 39159

Greg Brand
833 Briarwood Drive
Jackson, MS 39211

Mary Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Charles Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Pat Day
165 Kristen Court
Jackson, MS 39211

Walter Pol
5600 Keele Street, Apt. 1707
Jackson, MS 39206

Bill Kirksey
210 Briarwood, Apt. E-104
Jackson, MS 39206

Dave Hamlin
430 Boehle
Pearl, MS 39208

D

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee
for the United States Senate" Howard D. Clark, M.D. Treasurer

4-2-7

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.

7 9 0 4 0 1 0 2 0 6 8

Secretary of the Senate
Page 2
July 27, 1978

Joe Stone
Route 3, Box 93-B
Florence, MS 39073

Wayne Lester
208 Bruce
Batesville, MS 38606

Ron Boutwell
Route One
Tupelo, MS 38801

Don Travis
3545 Forest Hill Road
Jackson, MS 39212

Mike Chrestman
337 Stonecastle
Jackson, MS 39208

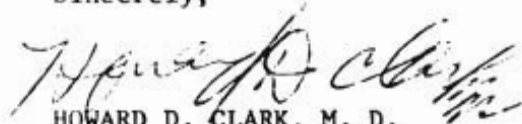
Cathy Chrestman
337 Stonecastle
Jackson, MS 39208

Marsha Hilliard
621 Briarcliff Circle
Jackson, MS 39212

Mrs. Jerry Howie
3569 Old Brandon Road, Apt. 3
Pearl, MS 39208

This note, with interest at the rate of 8%, is due in full October 12, 1978.

Sincerely,


HOWARD D. CLARK, M. D.
TREASURER

HDC/js

7 9 0 4 0 1 0 2 0 6 9

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 1 of 13 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE UNITED STATES SENATE				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071	07-14-78	20,000.00		*341.92
☐ Primary ☐ General ☐ Other	09-30-78	\$ 20,000.00	\$ 3,000.00	\$ 17,000.00
NATURE OF OBLIGATION (Details of Debt) *Accrued interest. Open note executed on July 14, 1978, in the amount of \$20,000 payable to the Bank of Flora with interest at the rate of 8%. (Disclosure of loan reported in period of occurrence, 07/01 - 07/17)				
Internal Revenue Service Stop 13-A Atlanta, Ga 31101				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 1,169.23	\$ 20,027.14	\$ 1,169.23
NATURE OF OBLIGATION (Details of Debt) Payroll withholdings and taxes for the reporting period.				
The Mississippi Bank Box 979 Jackson, MS 39205				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 50,000.00	\$ -0-	*150.00 \$ 50,000.00
NATURE OF OBLIGATION (Details of Debt) *accrued interest. Open note in the amount of \$50,000 executed on June 13, 1978, with interest at the rate of 9%, due in full December 9, 1978. Note based on financial statement on Governor Cliff Finch. (Disclosure of loan reported in period of occurrence)				
SUBTOTALS this period this page (optional)		\$	\$	\$
TOTAL this period (last page this line number only)		\$	\$	\$
Carry outstanding balance only to appropriate line of summary				

*These were included in the October 10
Quarterly Report for the period July 18-
Sept. 30, 1978.*

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 30-day note in the amount of \$5,522.00 payable to the First National Bank of Jackson, Jackson, Mississippi:

Latrell Ashley
3569 Old Brandon Road
Apt. 107
Pearl, MS 39208

Warren Emfinger
General Delivery
Mount Olive, MS 39119

Alvin M. Binder
4320 Deer Creek Drive
Jackson, MS 39205

Anita Day
165 Kristen Court
Jackson, MS 39211

Kimsey K. Lawrence, Jr.
1000 Lakeshore Drive, Box 70
Brandon, MS 39042

Charles Jackson
4929 Oak Leaf Drive
Jackson, MS 39212

This note, with interest at the rate of 9%, is due in full August 14, 1978.

Sincerely,


HOWARD D. CLARK, M. D.
TREASURER

HDC/js

1045 HIGH STREET • JACKSON, MS 39205 • P.O. BOX 22968 • PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee for the United States Senate." Howard D. Clark, M.D. Treasurer

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.

7 0 4 0 1 0 2 0 7

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 1 of 7 for

Line Number 13

(Use Separate Schedules for
each numbered line)

Name of Candidate and Committee in Full

GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U. S. SENATE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
 The Honorable Cliff Finch
 Governor of Ms.
 20th Floor, Walter Sillers Bldg.
 Jackson, MS 39205

Date (month,
day, year)

Amount of Original
 Debt, Contract,
 Agreement or
 Promise

Cumulative
 Payment
 To Date

Outstanding
 Balance at
 Close of
 This Period

☒ Primary

☐ General

☐ Other

06-13-78

\$50,000.00

\$ -0-

\$ 50,000.00

NATURE OF OBLIGATION (Details of Debt):

On 06-13-78, received \$50,000 open note at 9% interest based on financial statement of Gov. Finch. Payment due in full on December 9, 1978.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
 Internal Revenue Service
 Stop 13A
 Atlanta, Ga. 31101

Date (month,
day, year)

Amount of Original
 Debt, Contract,
 Agreement or
 Promise

Cumulative
 Payment
 To Date

Outstanding
 Balance at
 Close of
 This Period

☒ Primary

☐ General

☐ Other

06-26-78

\$ 430.31

\$ 12,378.52

\$430.31

NATURE OF OBLIGATION (Details of Debt):

Payroll withholdings for reporting period.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
 Telecom
 P. O. Box 16892
 Jackson, MS 39206

Date (month,
day, year)

Amount of Original
 Debt, Contract,
 Agreement or
 Promise

Cumulative
 Payment
 To Date

Outstanding
 Balance at
 Close of
 This Period

☒ Primary

☐ General

☐ Other

06-16-78

\$770.00

\$ -0-

\$770.00

NATURE OF OBLIGATION (Details of Debt):

Consultation services and creative writing, location videotaping/equipment and crew, master tape re televiaion spots for Mrs. Cliff Finch.

SUBTOTALS this period this page (optional)

\$

\$

\$51,200.31

TOTAL of period (last page this line number only)

\$

\$

\$

Carry outstanding balance only to appropriate line of summary.

*This was included in the 30-Day Primary Report
 for the period: June 13 - June 26*

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 8 of 13 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Governor Cliff Finch Campaign Committee for the United States Senate

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 20,000.00	\$ -0-	\$ 20,000.00

NATURE OF OBLIGATION (Details of Debt):

Ninety-day note at the rate of 8% interest due in full October 12, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
First National Bank of Jackson Box 291 Jackson, MS 39205				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 5,522.00	\$ -0-	\$ 5,522.00

NATURE OF OBLIGATION (Details of Debt):

Thirty-day note at the rate of 9% interest due in full August 14, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Jimmy Cagle Rt. 7, Box 332 Columbia, MS 39429	06-17-78 06-24-78	1,878.83 1,848.31		
☒ Primary ☐ General ☐ Other		\$	\$ 5,250.77	\$ 3,727.14

NATURE OF OBLIGATION (Details of Debt):

Aircraft rental

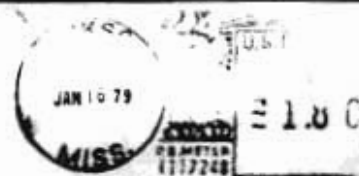
SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only).	\$	\$	\$

Carry outstanding balance only to appropriate line of summary.

*This note was reported on the 30-Day
Report following primary term and covered the
period July 1 through July 17*

7 9 0 4 0 1 0 2 0 7 3

LAW OFFICES
BINDER, MOORE & HOWELL
511 EAST PEARL STREET
P. O. BOX 25
JACKSON, MISSISSIPPI 39205



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

CERTIFIED

No. 663263

MAIL

79 JAN 10 11 21 AM

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS *MWE*

DATE:

JANUARY 15, 1979

SUBJECT:

MUR 813 - Interim Investigative
Report dated 1-2-79; Signed 1-11-79
Received in OCS1-12-79, 10:47

The above-named document was circulated on a 24
hour no-objection basis at 3:30, January 12, 1979.

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

79040102074

January 12, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: MUR 813

Please have the attached Interim Invest Report on
MUR 813 distributed to the Commission.

Thank you.

79040102075

BEFORE THE FEDERAL ELECTION COMMISSION
January 2, 1979

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 JAN 5 P 1: 26

In the Matter of)
Governor Cliff Finch)
for U.S. Senate Campaign)
Committee)

MUR 813

INTERIM INVESTIGATIVE REPORT

The allegations in this matter are that the Governor Cliff Finch for U.S. Senate Campaign Committee ("the Committee") may have violated 2 U.S.C. §441f in connection with an alleged solicitation letter; and 2 U.S.C. §434(b)(12) in connection with alleged unreported loans. The Commission found reason to believe on December 6, 1978, and the notification letter was sent on December 7, 1978.

After the return receipt card was not returned and there was no response from the Committee; Dr. Howard Clark, treasurer of the Committee, was contacted. Dr. Clark had not received the Commission's letter, and the Committee's address had been changed. The reason to believe notification letter was resent on December 29, 1978, and a response is expected shortly.

1/11/79
Date


William C. Oldaker
General Counsel

79 JAN 12 A 10: 47

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79040102075



FEDERAL ELECTION COMMISSION

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

December 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

79040102077

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4073.

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,

W. C. Oldaker

William C. Oldaker
General Counsel

79040103073

6203010062

DONALDSON - YORK S13 ✓

IS (PM) JAN 14 1971 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 \$ _____
 (CONSULT POSTMASTER FOR FEES)

2. **ARTICLE ADDRESSED TO**
 Dr. Howard Clark
 241 So. 1st Street
 Louisville, Miss 38117

3. **ARTICLE DESCRIPTION**
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943448

(Always obtain signature of addressee or agent)

I have received the article described above:
 SIGNATURE Addressee Authorized agent
☒ *Howard Clark, D. Legum*
 DATE OF DELIVERY POSTMARK

5. **ADDRESS** Complete only if requested

6. **UNABLE TO DELIVER BECAUSE** CLERK'S INITIALS
 34

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Governor Cliff Finch for)
U. S. Senate Campaign)
Committee)

MUR 813

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 6, 1978, the Commission, meeting in an executive session at which a quorum was present, determined by a vote of 5-1 to adopt the recommendation of the General Counsel to take the following actions in MUR 813:

1. Find reason to believe that the Governor Cliff Finch for U. S. Senate Campaign Committee may have violated 2 U.S.C. §441f and 2 U.S.C. §434(b) (12).
2. Send the letter attached to the First General Counsel's Report in this matter.

Commissioners Aikens, Harris, Springer, Thomson, and Tiernan voted affirmatively for the above determinations. Commissioner McGarry dissented.

Attest:

12/6/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: DECEMBER 5, 1978
SUBJECT: MUR 813 - First General Counsel's
Report dated 12-1-78
Received in OCS: 12-1-78,
10:27

The above-named document was circulated on a
48 hour vote basis at 2:30, December 1, 1978.

Commissioner McGarry submitted an objection
at 9:58, December 5, 1978, thereby placing MUR 813
on the Amended Agenda for December 6, 1978.

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

7 2 0 1 0 1 0 2 0 2 1

2.48 12/1/78
48 HOUR TALLY SHEET



FEDERAL ELECTION COMMISSION

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

DEC 5 49:58

Date and Time Transmitted: Dec. 1, 1978 - 2:30

Commissioner SPRINGER, AIKENS, TIERNAN, MCGARRY, THOMSON, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: December 5, 1978 - 2:30

MUR No. 813 First General Counsel's Report, dated 12-1-78

☒ I approve the recommendation
☐ (L) I object to the recommendation

COMMENTS:

For discussion
compare to MUR 778

Date: 12/5/78 Signature:

John W. McGarry

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.



December 1, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 813

Please have the attached State General Counsel's
Report on MUR 813 distributed to the Commission on a
48 hour tally basis.

Thank you.

79040102083

FEDERAL ELECTION COMMISSION
OFFICE OF THE
SECRETARY
FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION DEC 1 1978

78 NOV 31 AJO: 27
MUR NO. 815
STAFF MEMBER(S) Donaldson

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

RESPONDENT'S NAME: Governor Cliff Finch for U.S. Senate
Campaign Committee

RELEVANT STATUTE: 2 U.S.C. §441f
2 U.S.C. §434(b) (12)

INTERNAL REPORTS CHECKED: Governor Cliff Finch for U.S. Senate
Campaign Committee

FEDERAL AGENCIES CHECKED:

GENERATION OF MATTER

Reports Analysis referred this matter to the Office of General Counsel on September 19, 1978. The referral was based on a newspaper article which alleged that the Governor Cliff Finch for U.S. Senate Campaign Committee ("the Committee") violated 2 U.S.C. §441f and 2 U.S.C. §434(b) (12). The Commission, on November 2, 1978, voted to open a MUR on this matter in order that the Committee may be questioned in regard to the allegations.

EVIDENCE

The newspaper article which appeared in the Delta Democrat on August 27, 1978, stated that three named individuals involved with Governor Finch sent out letters requesting contributions to the Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children. The article also alleges that the Finch deficit, reported at \$136,582, is actually \$300,000.

A review of the Governor Cliff Finch for U.S. Senate Campaign Committee reports revealed no indication of either the Cliff Finch Senate Deficit Fund or the subject solicitation letters. Reports Analysis also confirmed that the Committee reported outstanding debts of \$151,185.75 rather than the alleged \$300,000.

PRELIMINARY ANALYSIS

2 U.S.C. §441f prohibits the making of contributions in the names of others and the knowing acceptance of such contributions. The letter reported in the article invited people to make contributions in violation of this section.

2 U.S.C. §434(b)(12) requires that campaign reports shall disclose the amount and nature of debts and obligations owed by or to the Committee. The article reported that the Finch deficit was substantially greater than the amount the Finch Committee had reported. This would indicate a possible violation of §434(b)(12).

RECOMMENDATION

Find reason to believe that the Governor Cliff Finch for U.S. Senate Campaign Committee may have violated 2 U.S.C. §441f and 2 U.S.C. §434(b)(12). Send attached letter.

Attachments

1. Referral from Reports Analysis Division
2. Proposed letter to Respondent

7001010303



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: William C. Oldaker

September 19, 1978

THROUGH: Orlando B. Potter *OBP*

FROM: Tom Haselhors *TH*

SUBJECT: Newspaper article concerning debt retirement for Senate candidate, Governor Cliff Finch. See attached.

After an in-depth analysis of the Governor Cliff Finch Campaign Committee for the U.S. Senate reports (through July 10, 1978), the following information from the attached newspaper article has been verified:

1. A loan from the Bank of Mississippi has been endorsed by Governor Cliff Finch in the amount of \$50,000 and is due on December 9, 1978.
2. As of the July 10 Report, the committee reports a negative cash on hand of \$39,421.79. (A request for additional information has been sent)
3. As of the July 10 Report, the committee reports outstanding debts of \$151,185.75 (including the \$50,000 bank loan endorsed by the candidate).

At this point, the reports from the Governor Cliff Finch for U.S. Senate Campaign Committee do not reflect the activity mentioned in the attached newspaper article (Cliff Finch Senate Deficit Fund, solicitation letters, deficit figure of \$300,000).

This newspaper article indicates a possible violation of 2 U.S.C. 441f (prohibition of contributions in the name of another) as well as 2 U.S.C. 434(b)(12)

In accordance with our interpretation of the Staff Director's May 10 1978 Memorandum concerning Procedures for the Handling of Internally Generated Matters, this information is being forwarded to your office for review and submission to the Commission for possible MUR determination.



Finch money went as far

Delta Democrat-Times 1/27/78

JACKSON—Cliff Finch, who not long ago had all the campaign money any politician in Mississippi would ever want, evidently has fallen on hard times.

Letters have gone out to most, if not all, of the governor's more than 7,000 colonels asking for \$100 contributions to the "Cliff Finch Senate Deficit Fund," which the letter says is "in excess of \$100,000."

This \$100, say the letters, would be in addition to anything you may have already given to the ill-fated Senate race. And if you've already given the \$2,000 maximum permitted by the Federal Election law, says the letter, then you can give in the name of your wife or kids.

Signing the letter are Mike Amis, Dr. Howard Clark and Benny Pittman. Amis and Clark have been visible in the Finch administration in various public posts, while Pittman, Finch's behind-the-scenes money man of varied business pursuits, has not. Pittman, however, is the keeper of the

bill minor

list of colonels, and also the keeper of the highly secretive colonels' fund, both of which have been kept from public view.

The colonels' list, as a matter of fact, is kept computerized in Dallas, Texas. For the first time since governors started having honorary colonels many years ago, the Finch colonels names will not appear in the state's official Blue Book soon to be issued by Secretary of State Heber Lathier. The reason is that the Finch folks wouldn't provide it.

In their letter, Amis, Clark and Pittman say that the Finch campaign deficit needs to be cleared so it won't bother the governor as he "continues his efforts for the people."

There are unconfirmed reports from

banking circles that the Finch deficit, which had been reported at \$136,582 in the official campaign filing, actually runs \$300,000 when all the loans made around the state are thrown in.

Finch himself secured a \$50,000 open note with Mississippi Bank during the second primary, and that note comes due on Dec. 9. Also deep in the Finch campaign reports is a \$19,421.78 second primary bank overdraft at Mississippi Bank.

That whopping overdraft revives memories of the Bert Lance case, and probably confirms the average bank customer's suspicions that people with political influence get special treatment.

Everything was rosy for the Finch campaign folks back before the June 6 primary when money was flowing like Pearl River, especially the \$1,000 checks from bankers and business people who were afraid of being left at the depot when the "Cliff Finch Train" pulled out.

Now, it is evident that the money

MISSISSIPPI

ist as it came

was being spent just about as freely as it was rolling in, and that's the problem.

Those who watch such things carefully could hardly comprehend how Finch spent more than \$420,000 reported as campaign expenses for the first primary, particularly since he never launched the media blitz that was expected.

What became evident from studying the expense reports is that Finch had very few volunteers around his campaign headquarters and out in the field.

He was having to lay out hard cash for workers to do his canvassing and to round up people to go to the polls, something that most candidates try to get volunteers to do.

After Finch's dismal showing in the first primary, the \$1,000 contributions from a lot of business types noticeably dropped off as many began to bail out before the train crashed.

The drive to generate enough money out of his "good friends," to pay off

the Senate campaign deficit should be an interesting test of how much loyalty Finch as a lame duck governor can still generate from his recent fanatical following.

There's no doubt that Finch refuses to accept the possibility his political career is at an end because of the trouncing he got in the senatorial runoff. Hence his concerted effort to change his image through the media and introduce a new openness and candor in his administration.

Word is already going around that Finch is going to run for something in 1979, because he must keep his hand in politics in order to stay alive. It may even be for the state legislature in his home district. That would give him a forum to continue to press for gubernatorial succession.

There also is a precedent for moving from the governor's office to the legislature. J. P. Coleman did it, and so did Hugh White.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to the Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit, reported at \$136,582, is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4073.

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

79040102090

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE 1-2-79

ANALYST CHIP FOLEY C. Foley

TO: WILLIAM OLDAKER, OGC
ATTENTION: S. DONALDSON

TEAM CHIEF SUZANNE WILSON S. Wilson

THROUGH: STAFF DIRECTOR AL for O.B.P.

COMPLIANCE REVIEW C. Bourn

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JH

MUR No. 813

DATE OF ORIGINAL REFERRAL 9/19/78

INFORMATION

**PURPOSE: RE: GOVERNOR CLIFF FINCH FOR U.S. SENATE CAMPAIGN COMMITTEE

Response to request for additional information sent on 9/25/78 concerning 10 Day Pre-Runoff, 30 Day Post Primary, and the July 10 Quarterly was considered inadequate with regard to problems with Schedule C, transfers, and possible fundraisers. An inadequate response letter, Reason to Believe, will be sent upon approval of OGC.

Two (2) additional requests for additional information were prepared on 12/9/78 for the 30 Day Post Primary and the October 10 Quarterly Reports. See attached.

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).
**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.



FEDERAL ELECTION COMMISSION

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

Dr. Howard D. Clark, Treasurer
Governor Cliff Finch Campaign Committee
For The U.S. Senate
Post Office Box 22968
Jackson, MS 39205

Dear Dr. Clark,

This letter is prompted by our interest in assisting Senate candidates and committees who wish to comply with the Federal Election Campaign Act.

30 Day Post Primary

During review of the October 10 Quarterly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Secretary of the Senate, Office of Public Records, 119 D Street, N.E., Washington, D.C. 20510, with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Susan Weber in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter
Staff Director

Attachment
FEC Form 12



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

CF/5

TO: GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR
THE U.S. SENATE MS

DATE: _____
I.D. NO.: C00091173

REQUEST FOR ADDITIONAL INFORMATION FOR THE OCTOBER 10 QUARTERLY REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 7/18/78 THROUGH 9/30/78
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please
return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- ☐ Coverage Dates: ☐ omitted or ☐ incorrect
- ☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☒ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect
- ☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted
- ☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☒ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) _____
- ☐ Inadequate Description of: ☐ proceeds ☐ dates ☐ events ☐ location of Schedule
- ☒ Signature: ☐ omitted ☐ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original
report. Please resubmit a signed copy of your report.

X Other: Schedule C, Line 13 itemizes debts and obligations owed by the committee. Please
be advised that loans or debts itemized on Schedule C should reflect the original
(continued on page two)

Your initial submission(s), together with this request for additional information, has been made available for
public inspection. The Commission urges you to file the additional submission(s) promptly to the above address.
If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-
9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House)
or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St.,
N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of
Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U.S. SENATE

REQUEST FOR ADDITIONAL INFORMATION

PAGE TWO

(continued from page one)

amount, cumulative payment(s) to date, and outstanding balance(s). Please amend your report to include the original amount of debts, contracts, agreements or promises, cumulative payment(s) to date, and outstanding balance(s).

Please be advised that any outstanding debt or obligation owed by the committee that is in the amount of \$500 or more must be reported on Schedule C. In addition, any debt or obligation in the amount of \$500 or less and is outstanding for sixty(60) days or more must be reported on Schedule C.

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

CF/5

TO: GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE

DATE:

FOR THE U.S. SENATE

MS

I.D. NO.: C00091173

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 DAY POST PRIMARY REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 7/1/78 THROUGH 7/17/78. PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

☐ Coverage Dates: ☐ omitted or ☐ incorrect

☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect

☐ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect

☐ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted

☐ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☐ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Inadequate Description of: ☒ proceeds ☒ dates ☒ events ☒ location of Schedule

☐ Signature: ☐ omitted ☐ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

☒ Other: Entries on Schedule B, Line 20 indicate possible fundraising activity sponsored by your committee during the 30 Day Post-Primary reporting period. Please be
(continued on page two)

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U.S. SENATE

REQUEST FOR ADDITIONAL INFORMATION

PAGE TWO

(continued from page one)

advised that 2 U.S.C. 434(b)(6) and Section 104.2(b)(6) of the FEC Regulations requires disclosure of all fundraising events, to include the total gross proceeds, date(s) and location(s) of the event(s). This information should be reported on Schedule D and the total entered as a memo entry on Line 14(c) of the Detailed Summary Page. In addition, any receipt in excess of \$100 must be itemized on a separate Schedule A and included in the total of itemized receipts on Line 14(a) of the Detailed Summary Page. Receipts of less than \$100 must be included in the total of unitemized receipts on Line 14(b) of the Detailed Summary Page. Please amend your report accordingly to reflect this activity.

Schedule C, Line 13 itemizes debts and obligations owed by the committee. Please be advised that loans or debts itemized on Schedule C should reflect the original amount, cumulative payment(s) to date, and outstanding balance(s). Please amend your report to include the original amount of debts, contracts, agreements or promises, cumulative payment(s) to date, and outstanding balance(s).

Please be advised that any outstanding debt or obligation owed by the committee that is in the amount of \$500 or more must be reported on Schedule C. In addition, any debt or obligation in the amount of \$500 or less and is outstanding for sixty (60) days or more must be reported on Schedule C.

[illegible]

In the Matter of)
)
Governor Cliff Finch) PRE-MUR 13
Campaign Committee for the)
U. S. Senate (Mississippi))

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 2, 1978, the Commission determined by a vote of 4-0 to adopt the recommendation, as set forth in the General Counsel's memorandum dated October 30, 1978, that a MUR should be opened in order that the Commission may question the Governor Cliff Finch for U.S. Senate Campaign Committee in connection with this matter.

Voting for this determination were Commissioners Springer, Tiernan, Thomson, and Harris.

Attest:

11/2/78

Date _____

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

Received in Office of Commission Secretary: 10-30-78, 1:23
Circulated on 48 hour vote basis: 10-31-78, 4:00

October 30, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Carr
SUBJECT: Pre NUR 13

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis.

Thank you.

79040102098



FEDERAL ELECTION COMMISSION

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

78 OCT 30 P 1: 23

October 30, 1978

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker *W. C. Oldaker*

SUBJECT: Pre-MUR 13 - Governor Cliff Finch Campaign
Committee for the U.S. Senate (Mississippi)

Attached is a referral from the Reports Analysis Division to the Office of General Counsel dated September 19, 1978. The referral is based on a newspaper article which appeared in the Delta Democrat on August 27, 1978, in connection with Governor Cliff Finch's candidacy for the U.S. Senate.

The article alleges that three named individuals involved with Governor Finch sent out letters requesting contributions to the Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). The article also alleges that the Finch deficit, reported at \$136,582, is actually \$300,00 (in violation of 2 U.S.C. §434(b)(12)).

Reports Analysis reviewed the Governor Cliff Finch for U.S. Senate Campaign Committee reports which revealed that there is no indication of either the Cliff Finch Senate Deficit Fund or the subject solicitation letters. Reports Analysis also confirmed that the Committee reported outstanding debts of \$151,185.75 rather than the alleged \$300,000.

79040102099

Recommendation

Based on the allegations in the newspaper report, 1/ we think that a MUR should be opened in order that the Commission may question the Governor Cliff Finch for U.S. Senate Campaign Committee in connection with this matter.

Attachments

Referral from Reports Analysis dated September 19, 1978

1/ The article also describes a bank overdraft of \$39,421.78 at the Mississippi Bank. Reports Analysis noted a negative cash on hand of this amount on the Committee's July 10, 1978, report and has sent an RFAI out on this.

001001002



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: William C. Oldaker

September 19, 1978

THROUGH: Orlando B. Potter *OBP*

FROM: Tom Haselhorst *TH*

SUBJECT: Newspaper article concerning debt retirement for Senate candidate, Governor Cliff Finch. See attached.

After an in-depth analysis of the Governor Cliff Finch Campaign Committee for the U.S. Senate reports (through July 10, 1978), the following information from the attached newspaper article has been verified:

1. A loan from the Bank of Mississippi has been endorsed by Governor Cliff Finch in the amount of \$50,000 and is due on December 9, 1978.
2. As of the July 10 Report, the committee reports a negative cash on hand of \$39,421.79. (A request for additional information has been sent)
3. As of the July 10 Report, the committee reports outstanding debts of \$151,185.75 (including the \$50,000 bank loan endorsed by the candidate).

At this point, the reports from the Governor Cliff Finch for U.S. Senate Campaign Committee do not reflect the activity mentioned in the attached newspaper article (Cliff Finch Senate Deficit Fund, solicitation letters, deficit figure of \$300,000).

This newspaper article indicates a possible violation of 2 U.S.C. 441f (prohibition of contributions in the name of another) as well as 2 U.S.C. 434(b)(12).

In accordance with our interpretation of the Staff Director's May 10 1978 Memorandum concerning Procedures for the Handling of Internally Generated Matters, this information is being forwarded to your office for review and submission to the Commission for possible MUR determination.



Finch money went as fast

Delta Democrat-Times 1/27/78

JACKSON—Cliff Finch, who not long ago had all the campaign money any politician in Mississippi would ever want, evidently has fallen on hard times.

Letters have gone out to most, if not all, of the governor's more than 7,000 colonels asking for \$100 contributions to the "Cliff Finch Senate Deficit Fund," which the letter says is "in excess of \$100,000."

This \$100, say the letters, would be in addition to anything you may have already given to the ill-fated Senate race. And if you've already given the \$2,000 maximum permitted by the Federal Election law, says the letter, then you can give in the name of your wife or kids.

Signing the letter are Mike Amis, Dr. Howard Clark and Benny Pittman. Amis and Clark have been visible in the Finch administration in various public posts, while Pittman, Finch's behind-the-scenes money man of varied business pursuits, has not. Pittman, however, is the keeper of the

bill minor

list of colonels, and also the keeper of the highly secretive colonels' fund, both of which have been kept from public view.

The colonels' list, as a matter of fact, is kept computerized in Dallas, Texas. For the first time since governors started having honorary colonels many years ago, the Finch colonels names will not appear in the state's official Blue Book soon to be issued by Secretary of State Heber Laddner. The reason is that the Finch folks wouldn't provide it.

In their letter, Amis, Clark and Pittman say that the Finch campaign deficit needs to be cleared so it won't bother the governor as he "continues his efforts for the people."

There are unconfirmed reports from

banking circles that the Finch deficit, which had been reported at \$136,582 in the official campaign filing, actually runs \$200,000 when all the loans made around the state are thrown in.

Finch himself secured a \$50,000 open note with Mississippi Bank during the second primary, and that note comes due on Dec. 9. Also deep in the Finch campaign reports is a \$39,421.78 second primary bank overdraft at Mississippi Bank.

That whopping overdraft revives memories of the Bert Lance case, and probably confirms the average bank customer's suspicions that people with political influence get special treatment.

Everything was rosy for the Finch campaign folks back before the June 6 primary when money was flowing like Pearl River, especially the \$1,000 checks from bankers and business people who were afraid of being left at the depot when the "Cliff Finch Train" pulled out.

Now, it is evident that the money

ist as it came

was being spent just about as freely as it was rolling in, and that's the problem.

Those who watch such things carefully could hardly comprehend how Finch spent more than \$420,000 reported as campaign expenses for the first primary, particularly since he never launched the media blitz that was expected.

What became evident from studying the expense reports is that Finch had very few volunteers around his campaign headquarters and out in the field.

He was having to lay out hard cash for workers to do his canvassing and to round up people to go to the polls, something that most candidates try to get volunteers to do.

After Finch's dismal showing in the first primary, the \$1,000 contributions from a lot of business types noticeably dropped off as many began to bail out before the train crashed.

The drive to generate enough money out of his "good friends," to pay off

the Senate campaign deficit should be an interesting test of how much loyalty Finch as a lame duck governor can still generate from his recent fanatical following.

There's no doubt that Finch refuses to accept the possibility his political career is at an end because of the trouncing he got in the senatorial runoff. Hence his concerted effort to change his image through the media and introduce a new openness and candor in his administration.

Word is already going around that Finch is going to run for something in 1979, because he must keep his hand in politics in order to stay alive. It may even be for the state legislature in his home district. That would give him a forum to continue to press for gubernatorial succession.

There also is a precedent for moving from the governor's office to the legislature. J.P. Coleman did it, and so did Hugh White.



FEDERAL ELECTION COMMISSION

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

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker

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Recommendation

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RE-MUR 13



FEDERAL ELECTION COMMISSION

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

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bill minor

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FEDERAL ELECTION COMMISSION

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 813

Date Filmed 2/14/79 Camera No. --- 2

Cameraman bpc



FEDERAL ELECTION COMMISSION

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

MICROFILM ROLL #

12





FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 813

Date Filmed 4/25/79 Camera No. --- 2

Cameraman SPC

Recent Rec. 7904012000

FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

DEC 26 1978

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch for U.S. Senate
Campaign Committee
P. O. Box 22968
Jackson, Mississippi 39205

POSTAGE AND FEES PAID



Second Notice. No reply
to first notice mailed

DEC 19 1978



DEC 21 1978

CERTIFIED

943/96

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813 Dossedon

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one): ☐ Show to whom and date delivered¢ ☒ Show to whom, date, and address of delivery¢ ☐ RESTRICTED DELIVERY Show to whom and date delivered¢ ☐ RESTRICTED DELIVERY Show to whom, date, and address of delivery \$..... (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: Howard D Clark	
3. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO. 923/16	
(Always obtain signature of addressee or agent)	
I have received the article described above. SIGNATURE ☐ Addressee ☐ Authorized agent	
4	DATE OF DELIVERY
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE	CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

December 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

79040120004

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

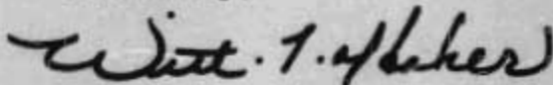
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at 202-523-4073.

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

79040120003

79040120006

MUR 813 *Donaldson*

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 \$
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
Alvin M Bender
511 East Pearl Street
Jackson, Miss. 39205

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943883

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
2-7-79

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

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

February 5, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alvin M. Binder, Esquire
Binder, Moore, and Howell
511 East Pearl Street
Jackson, Mississippi 39205

Re: MUR 813-Governor Cliff
Finch for U.S. Senate
Campaign Committee

Dear Mr. Binder:

This letter will confirm the Commission's receipt of your letter, dated January 15, 1979, in connection with your client, the Governor Cliff Finch for U.S. Senate Campaign Committee. After reviewing your letter, the Commission determined, on February 1, 1979 to find no reasonable cause to believe that your client violated 2 U.S.C. § 441f and 2 U.S.C. § 434(b)(12). Accordingly, the Commission has closed its file on this matter.

Should you have any further questions, please call Susan Donaldson at (202) 523-4073.

Sincerely,

William C. Oldaker
General Counsel

79040102011
79040120007

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alvin M. Binder, Esquire
Binder, Moore, and Howell
511 East Pearl Street
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Finch for U.S. Senate
Campaign Committee

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Should you have any further questions, please call Susan Donaldson at (202) 523-4073.

Sincerely,

151
William C. Oldaker
General Counsel

40
2-5-79

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter)
)
) MUR 813
Governor Cliff Finch for)
U.S. Senate Campaign Committee)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 1, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated February 1, 1979, regarding the above-captioned matter:

1. Find no reasonable cause to believe that the Governor Cliff Finch for U.S. Senate Campaign Committee violated 2 U.S.C. §441f or 2 U.S.C. §434(b)(12).
2. Send the letter attached to the above-named report.
3. Close the file.

Voting for this determination were Commissioners Springer, Aikens, Tiernan, McGarry, and Thomson.

Attest:

2/1/79

Marjorie W. Emmons

Date Marjorie W. Emmons, Secretary to the Commission
Received in Office of Commission Secretary: 1-30-79, 10:08
Circulated on 48 hour vote basis: 1-30-79, 2:15

79040102015
79040120007

January 30, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 813

Please have the attached General Counsel's Report on MUR 813 distributed to the Commission on a 48 hour tally basis.

Thank you.

79040102017
79040120010

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Governor Cliff Finch for)
U.S. Senate Campaign Committee)

MUR 813
79 JAN 30 10:08

GENERAL COUNSEL'S REPORT

Allegations

A newspaper article which appeared in the Delta Democrat on August 27, 1978, alleged that the Governor Cliff Finch for U.S. Senate Campaign Committee ("the Committee") violated 2 U.S.C. §441f in connection with a letter which solicited contributions in the name of another; and 2 U.S.C. §434(b)(12) for failing to report all of the Committee's campaign debts.

Evidence and Analysis

The Commission, on December 6, 1978, found reason to believe that the Committee may have violated 2 U.S.C. §441f and 2 U.S.C. §434(b)(12). Alvin M. Binder, counsel for the Committee, responded to the allegations in a letter dated January 15, 1979 (Attachment I).

2 U.S.C. §441f prohibits contributions made in the name of another person. The Delta Democrat article alleged that three individuals associated with the Finch campaign sent out solicitation letters which stated that if you had already contributed the maximum amount to Finch's campaign, then you could contribute in the name of your wife or children. Mr. Binder sent a copy of one of the solicitation letters to the Commission. The relevant part of the letter reads as follows:

79040102018
79040120011

"If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100. However, this will not restrict your wife nor family from contributing should they desire to do so.

"We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days."

It appears that the newspaper article was inaccurate in connection with the Committee's solicitation for contributions prohibited by 2 U.S.C. § 441f.

2 U.S.C. § 434(b)(12) requires that each Committee's report disclose the amount and nature of debts and obligations owed by or to the committee... The newspaper article alleged that the Finch deficit, reported at \$136,582 was actually \$300,000 when "all of the loans around the state are thrown in." Mr. Binder stated that the Committee "reported timely all debts of the campaign as compiled by the bookkeeper who was supervised by a certified public accounting firm." Binder listed all of the loans which were authorized by the Committee. Each loan had been disclosed by the Committee on their FEC reports. There is no evidence to indicate that the Committee authorized loans which were not disclosed in violation of 2 U.S.C. § 434(b)(12).

79040102019
79040120012

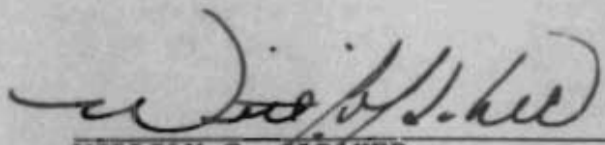
Recommendation

Find no reasonable cause to believe that the Governor Cliff Finch for U. S. Senate Campaign Committee violated 2 U.S.C. § 441f or 2 U.S.C. § 434(b)(12). Send attached letter. Close the file.

Attachment

1. Response from Binder dated January 15, 1979.
2. Proposed letter to Binder

79040102020
79040120013
2/1/79
DATE


WILLIAM C. OLDAKER
GENERAL COUNSEL

ATTACHMENT I
9084

LAW OFFICES
BINDER, MOORE & HOWELL
511 EAST PEARL STREET
P. O. BOX 26
JACKSON, MISSISSIPPI 39205

79 JAN 14 PM 2:13

ALVIN M. BINDER
RUSSELL D. MOORE, III
WILLIAM S. HOWELL
WILLIAM S. KIRKSEY
BOBBY B. DeLAUGHTER

January 15, 1979

MILLARD M. BUSH (1988)
TELEPHONE
948-3800
AREA CODE 801

000013

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

Re: MUR 813

Dear Mr. Oldaker:

On January 12, 1979, at approximately 10:00 a.m. Dr. Howard D. Clark received a letter from you under date of December 7, 1978. He promptly telephoned me and sent a copy of the letter to me which we received the morning of January 13, 1979. This morning I telephoned Mrs. Susan Donaldson to tell her of our receipt of the letter and our response. A copy of your letter is attached hereto as Exhibit "A".

I wish to advise that I will represent Dr. Howard D. Clark, Mr. Mike Amis and Mr. Benny Pittman in response to the matters complained of.

FIRST ALLEGATION: "It is alleged that you, Mike Amis and Benny Pittman, sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election Law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C., Sec. 441f)."

The allegation is denied by Messrs. Clark, Amis and Pittman as being inaccurate and not at all correct.

The Governor of Mississippi did not receive the democratic endorsement in his Senate race and as the records will reflect he had a deficit in excess of \$100,000.00 reported to the Federal Election Commission and filed appropriately with the Secretary of State of the State of Mississippi and with the Federal Election Commission.

79040102021
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79040102022
79040120015

Mr. William C. Oldaker
January 15, 1979
Page Two

A letter was mailed by the named individuals in the alleged complaint; however, the letter does not state that if one had contributed the maximum amount then that person could contribute in the name of his wife or children. The appropriate part of the letter that is relevant states as follows:

"If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100.00. However, this will not restrict your wife nor family from contributing should they desire to do so.

"We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days."

This letter containing the above statement is attached hereto as Exhibit "B".

The letter speaks for itself and does not in any manner imply what has been alleged.

SECOND ALLEGATION: "It is alleged that the Finch deficit was incorrectly reported as \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. Sec. 434(b)(12))."

The Governor Cliff Finch Campaign Committee has reported timely all debts of the campaign as compiled by the bookkeeper who was supervised by a certified public accounting firm. The only note obligations known and authorized by the Committee were as follows, to wit:

(a) On May 23, 1978, attached to the 10-day pre-runoff report covering a period of May 23 through June 12, was a letter of disclosure forwarded to the Secretary of the Senate indicating the names of individuals who had signed a letter of guarantee to the Mississippi Bank which was to stand good for payment for the Campaign Committee's telephone bills

Mr. William C. Oldaker
January 15, 1979
Page Three

79040102023
79040120013

with South Central Bell Telephone Company should the campaign not pay these bills in full when due. Since the note was not carried by the Bank as an asset and, therefore, since the Committee did not list this on Schedule C, Debts and Obligations, when the guarantee was executed, Mr. Doug Patton advised that this could be construed a potential liability and should be handled by a letter of disclosure. This was accomplished and was always disclosed on each and every report sent to the Secretary of the Senate and filed with the Secretary of State of the State of Mississippi. Copy of the letter of disclosure of May 23, 1978, is attached as Exhibit "C".

(b) On June 14, 1978, a note was executed in the amount of \$20,000.00 payable to the Bank of Flora, Mississippi, with interest at the rate of eight (8) percent and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978. See disclosure letter of July 27, 1978, attached hereto as Exhibit "D".

(c) Open note in the amount of \$50,000.00 was executed June 13, 1978, with interest at the rate of nine (9) percent by the candidate, Governor Cliff Finch, to the Mississippi Bank and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978, and filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi. See copy of Debts and Obligations attached hereto as Exhibit "E".

(d) A note in the amount of \$5,522.00 payable to the First National Bank of Jackson was executed July 14, 1978, bearing interest at nine (9) percent and was disclosed to the Secretary of the Senate on the 30-day report following primary runoff and covered the period July 1 through July 17. A copy of the disclosure filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi is attached and designated Exhibit "F".

The term "Cliff Finch Deficit Fund" were the words utilized in the letter after the Governor's defeat and refers, I am informed, to the deficit that was reflected in the reports that

Mr. William C. Oldaker
January 15, 1979
Page Four

have been previously furnished. No other loans except those mentioned above, copies of the reports which have been attached, are known to the Committee.

The Campaign Committee paid the costs of the solicitation letter which was made appropriately on campaign stationery and Messrs. Clerk, Amis and Pittman did not incur any independent expenditure on their part and nothing was done by them not in conjunction with the Campaign Committee. All expenditures for this letter, cost of paper, etc., has been properly reported in the bookkeeping entries furnished the FEC and the Secretary of State of the State of Mississippi.

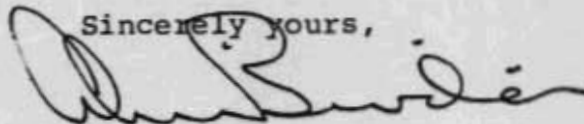
Dr. Howard D. Clark's residence address is 221 Second Street, Morton, Mississippi 39117; Mr. Jesse Mike Amis' address is 2219 Greenbriar, Jackson, Mississippi 39211; and Mr. Benny Pittman's address is 5495 Briarfield Road, Jackson, Mississippi 39211.

Dr. Clark's position in the Senate Campaign was that of treasurer; Mr. Amis' position was that of Chairman of the Campaign Committee; and Mr. Pittman's position in the campaign was that of Chairman of the Finance Committee. These positions were properly noticed on March 31, 1978, and May 24, 1978, filed with the Secretary of State of the State of Mississippi.

We hope that this fully responds to the issues presented and should you desire further information whatsoever, please do not hesitate to communicate same to the undersigned.

With respect, we remain

Sincerely yours,



ALVIN M. BINDER

AMB:ncb

Enclosures

cc Mrs. Susan Donaldson

79040102024
79040120017



FEDERAL ELECTION COMMISSION

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

December 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

ref to letter in our report
buried in staff to SEC about
plaintiff's case re false info

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4073.

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,

W. C. Oldaker

William C. Oldaker
General Counsel

79040102025
79040120017

CLIFF FINCH



FOR UNITED STATES SENATE

August 7, 1978

Colonel William Gerald Fisher
2511 Buckner Avenue
Tupelo, Mississippi 38801

Dear William:

YOUR FRIEND, CLIFF FINCH, NEEDS YOUR HELP NOW!

On behalf of our Governor, we would like to express to you his appreciation for your loyalty, support, dedication, and, above all, your friendship. After the last election, Governor Finch called his staff together and asked each member to give rededication to their responsibilities so that even greater services might be rendered to the citizens of the State of Mississippi.

Our campaign has a deficiency in excess of \$100,000 and we must look to our friends to aid and assist in clearing up this campaign debt immediately. We have all agreed that each of us will contribute \$100 or more to the CLIFF FINCH SENATE DEFICIT FUND so that this debt may be reduced and cleared in order that it will not be of concern to the Governor as he continues his efforts for the people. If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100. However, this will not restrict your wife nor family from contributing should they desire to do so.

We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days. Please be sure to complete this receipt in its entirety, keeping the pink copy for your records, before returning it to us. This receipt must be signed.

Governor Finch and his family send their personal regards, best wishes and love to you and your family, who are all our dear friends.

Sincerely,

MIKE ANIS

HOWARD D. CLARK, M.D.

DENNY YITIMAR

MA/HDC/BP/js

1045 HIGH STREET • JACKSON, MS 39205 • PO BOX 22968 • PHONE 354-3636

Authorized by the Federal Election Commission

This document is filed with the Federal Election Commission
and is available to the public.

7 9 0 4 0 1 0 2 0 0 3
7 9 0 4 0 1 0 2 0 0 3
CLIFF FINCH



FOR
UNITED STATES
SENATE

May 23, 1978

Secretary of the Senate
119 "D" Street, N.E.
Washington, D.C. 20510

RE: Disclosure to 10 Day Pre-
Election Report

Sir:

The principal campaign committee wishes to disclose a guarantee agreement in the sum of \$15,000.00 which is to stand good for payment of the campaign committee's telephone bills to South Central Bell Telephone Company should the campaign not pay these bills in full when due.

The undersigned executed a note which may be called upon should the telephone bills not be paid aforesaid. The note is not carried by the bank as an asset and the committee did not list same on Schedule C, Debts and Obligations. When this guarantee was executed, a telephone call was made to Mr. Doug Patton in Washington who advises the committee from time to time, and it was explained that this could be construed as a potential liability and therefore a scrutiny of the signatories below will reflect that none have been allowed to contribute to the campaign.

Joseph David Hamlin
430 Boehle
Pearl, MS 39208

Howard D. Clark, M.D.
221 Second Street
Morton, MS 39117

Nathan Eugene McClintock
156 Glenstone Circle
Jackson, MS 39212

Jesse Mike Amis
2219 Greenbriar Drive
Jackson, MS 39211

B. G. Perry
1840-B Meadowbrook Drive
Jackson, MS 39211

Alvin M. Binder
4320 Deer Creek
Jackson, MS 39211

Thomas L. Wallace
Route 6, Box 89-B
Columbia, MS 39429

W. J. Caraway
1604 Belmont
Jackson, MS 39202

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

*This was attached to the 10-Day
Pre Runoff Report*

By mail May 23 - June 12

EXHIBIT C

7 9 0 4 0 1 0 2 0 2 2

Secretary of the Senate
May 23, 1978
Page 2

Milton York
625 Benning Road
Jackson, MS 39206

Donald Travis
3545 Forest Hill Road
Jackson, MS 39212

Jerry Howie
3569 Old Brandon Road, #3
Pearl, MS 39208

Norman Harris
6132 Whitestone Road
Jackson, MS 39206

Charley Mac Jones
4311 Old Brandon Road
Jackson, MS 39208

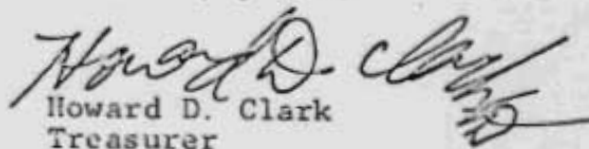
E. C. Lloyd
37 Dickens Court
Jackson, MS 39206

Jackie Clark
221 Second Street
Morton, MS 39117

Johnnie Moss Bush
227 Lakebend Circle
Brandon, MS 39042

We disclose this information pursuant to memo in the file that was made after discussion with Mr. Patton on how we should handle this and for your information purposes only.

Sincerely yours,


Howard D. Clark
Treasurer

Djb

THE MISSISSIPPI BANK
POST OFFICE BOX 978, JACKSON, MISSISSIPPI 39205

March 30, 1978

SANFORD H. LEVINGS
VICE PRESIDENT

South Central Bell
P. O. Box 811
Jackson, Mississippi 39205

Attention: Ms. Marie Murphy

Dear Ms. Murphy:

The Mississippi Bank, Jackson, Mississippi, guaranties payment to South Central Bell on all charges, up to \$15,000, for telephone service provided to Governor Cliff Finch and billed to the following account numbers.

354-3636
354-3637
354-3640
354-3641

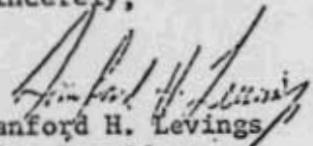
and on the following Wats numbers -

060-0504 (W 31-3099)
060-0507 (W 31-3100)
800-682-6421 (W 31-3098)

Should Governor Finch default in payment of these accounts prior to April 1, 1979, and upon presentation of the bills to us, The Mississippi Bank agrees to pay all charges, up to \$15,000, to South Central Bell immediately upon demand.

This agreement expires on April 1, 1979, and shall not be voided prior to that time, except by the mutual consent of The Mississippi Bank and South Central Bell.

Sincerely,


Sanford H. Levings
Vice President

SHL/zw

79040120023

7 9 0 4 0 1 0 2 0 3 0

South Central Bell

P. O. Box 2218
221 East Capitol Street
Jackson, Mississippi 39205

July 14, 1978

The Mississippi Bank
P. O. Box 979
Jackson, Mississippi 39205

Dear Mr. Levings:

Enclosed is the bank letter of credit established by The Mississippi Bank for Cliff Finch covering his obligation of payment to South Central Bell during the recent political campaign.

Return of the above mentioned letter cancels The Mississippi Bank's obligation of payment of the telephone service outlined in the original letter of credit.

Sincerely,

Leslie Moore
Leslie Moore
Manager

7 9 0 4 0 1 2 0 0 2 1

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 90-day note in the amount of \$20,000.00 payable to the Bank of Flora, Flora, Mississippi:

Beth Stone
Route 3, Box 93-B
Florence, MS 39073

Charlie Graham
Route One
Collins, MS 39428

Kevin Sharpe
6300 Old Canton Road
Jackson, MS 39216

Lanee¹ Ashley
3569 Old Brandon Road, Apt. 107
Pearl, MS 39208

Herman Glazier
P. O. Box 368
Rolling Fork, MS 39159

Greg Brand
833 Briarwood Drive
Jackson, MS 39211

Mary Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Charles Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Pat Day
165 Kristen Court
Jackson, MS 39211

Walter Pol
5600 Keele Street, Apt. 1707
Jackson, MS 39206

Bill Kirksey
210 Briarwood, Apt. E-104
Jackson, MS 39206

Dave Hamlin
430 Boehle
Pearl, MS 39208

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee for the United States Senate," Howard D. Clark, M.D. Treasurer.

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.

7 9 0 4 0 1 0 2 0 3 2
Secretary of the Senate

Page 2

July 27, 1978

Joe Stone
Route 3, Box 93-B
Florence, MS 39073

Wayne Lester
208 Bruce
Batesville, MS 38606

Ron Boutwell
Route One
Tupelo, MS 38801

Don Travis
3545 Forest Hill Road
Jackson, MS 39212

Mike Chrestman
337 Stonecastle
Jackson, MS 39208

Cathy Chrestman
337 Stonecastle
Jackson, MS 39208

Marsha Hilliard
621 Briarcliff Circle
Jackson, MS 39212

Mrs. Jerry Howie
3569 Old Brandon Road, Apt. 3
Pearl, MS 39208

This note, with interest at the rate of 8%, is due in full October 12, 1978.

Sincerely,


HOWARD D. CLARK, M. D.
TREASURER

HDC/js

7 9 0 4 0 1 2 0 0 2 6

7 9 0 4 0 1 0 2 0 3 3
7 9 0 4 0 1 3 0 0 2 7

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 1 of 13 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full
GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE UNITED STATES SENATE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071	07-14-78	20,000.00		*341.92
☐ Primary ☐ General ☐ Other	09-30-78	\$ 20,000.00	\$ 3,000.00	\$ 17,000.00

NATURE OF OBLIGATION (Details of Debt):

*Accrued interest. Open note executed on July 14, 1978, in the amount of \$20,000 payable to the Bank of Flora with interest at the rate of 8%. (Disclosure of loan reported in period of occurrence, 07/01 - 07/17)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Internal Revenue Service Stop 13-A Atlanta, Ga 31101				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 1,169.23	\$ 20,027.14	\$ 1,169.23

NATURE OF OBLIGATION (Details of Debt):

Payroll withholdings and taxes for the reporting period.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
The Mississippi Bank Box 979 Jackson, MS 39205				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 50,000.00	\$ -0-	*150.00 \$ 50,000.00

NATURE OF OBLIGATION (Details of Debt):

*accrued interest.
Open note in the amount of \$50,000 executed on June 13, 1978, with interest at the rate of 9%, due in full December 9, 1978. Note based on financial statement on Governor Cliff Finch. (Disclosure of loan reported in period of occurrence)

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$

Carry outstanding balance only to appropriate line of summary

*These were included in the October 10
Quarterly Report for the period July 18 -
Sept. 30, 1978.*

CLARK FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 30-day note in the amount of \$5,522.00 payable to the First National Bank of Jackson, Jackson, Mississippi:

Latrelle Ashley
3569 Old Brandon Road
Apt. 107
Pearl, MS 39208

Warren Enfinger
General Delivery
Mount Olive, MS 39119

Alvin M. Binder
4320 Deer Creek Drive
Jackson, MS 39205

Anita Day
165 Kristen Court
Jackson, MS 39211

Kimsey K. Lawrence, Jr.
1000 Lakeshore Drive, Box 70
Brandon, MS 39042

Charles Jackson
4929 Oak Leaf Drive
Jackson, MS 39212

This note, with interest at the rate of 9%, is due in full August 14, 1978.

Sincerely,

HOWARD D. CLARK, M. D.
TREASURER

HDC/js

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee for the United States Senate." Howard D. Clark, M.D. Treasurer.

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.

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U. S. SENATE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
The Honorable Cliff Finch
Governor of Ms.
20th Floor, Walter Sillers Bldg.
Jackson, MS 39205

Date (month,
day, year)

Amount of Original
Debt, Contract,
Agreement or
Promise

Cumulative
Payment
To Date

Outstanding
Balance at
Close of
This Period

☒ Primary

☐ General

☐ Other

06-13-78

\$50,000.00

\$ -0-

\$ 50,000.00

NATURE OF OBLIGATION (Details of Debt):

On 06-13-78, received \$50,000 open note at 9% interest based on financial statement of Gov. Finch. Payment due in full on December 9, 1978.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
Internal Revenue Service
Stop 13A
Atlanta, Ga. 31101

Date (month,
day, year)

Amount of Original
Debt, Contract,
Agreement or
Promise

Cumulative
Payment
To Date

Outstanding
Balance at
Close of
This Period

☒ Primary

☐ General

☐ Other

06-26-78

\$ 430.31

\$ 12,378.52

\$ 430.31

NATURE OF OBLIGATION (Details of Debt):

Payroll withholdings for reporting period.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
Telecom
P. O. Box 16892
Jackson, MS 39206

Date (month,
day, year)

Amount of Original
Debt, Contract,
Agreement or
Promise

Cumulative
Payment
To Date

Outstanding
Balance at
Close of
This Period

☒ Primary

☐ General

☐ Other

06-16-78

\$ 770.00

\$ -0-

\$ 770.00

NATURE OF OBLIGATION (Details of Debt):

Consultation services and creative writing, location videotaping/equipment and crew, master tape re televiaion spots for Mrs. Cliff Finch.

SUBTOTALS this period this page (optional)

\$

\$

\$ 51,200.31

TOTAL this period (last page this line number only)

\$

\$

\$

Carry outstanding balance only to appropriate line of summary.

*This was included in the 30-Day Primary Report
for the period: June 13 - June 26*

7 9 0 4 0 1 0 2 0 3 6
DEBTS AND OBLIGATIONS
Supporting Line Numbers 12 and 13
of FEC FORM 3
(Indicate Primary or General Election for each Entry)

Page 18 of 13 for
Line Number 13
(Use Separate Schedules for each numbered line)

Name of Candidate and Committee in Full
Governor Cliff Finch Campaign Committee for the United States Senate

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 20,000.00	\$ -0-	\$ 20,000.00

NATURE OF OBLIGATION (Details of Debt):
Ninety-day note at the rate of 8% interest due in full October 12, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
First National Bank of Jackson Box 291 Jackson, MS 39205				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 5,522.00	\$ -0-	\$ 5,522.00

NATURE OF OBLIGATION (Details of Debt):
Thirty-day note at the rate of 9% interest due in full August 14, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Jimmy Cagle Rt. 7, Box 332 Columbia, MS 39429	06-17-78 06-24-78	1,878.83 1,848.31		
☒ Primary ☐ General ☐ Other		\$	\$ 5,250.77	\$ 3,727.14

NATURE OF OBLIGATION (Details of Debt):
Aircraft rental

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only)	\$	\$	\$

Carry outstanding balance only to appropriate line of summary.

*The note was reported on the 30-day
Paper financing statement and covered the
period July 1 through July 14*



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Alvin M. Binder, Esquire
Binder, Moore, and Howell
511 East Pearl Street
Jackson, Mississippi 39205

Re: MUR 813-Governor Cliff
Finch for U.S. Senate
Campaign Committee

Dear Mr. Binder:

This letter will confirm the Commission's receipt of your letter, dated January 15, 1979, in connection with your client, the Governor Cliff Finch for U.S. Senate Campaign Committee. After reviewing your letter, the Commission determined, on , 1979 to find no reasonable cause to believe that your client violated 2 U.S.C. § 441f and 2 U.S.C. § 434(b)(12). Accordingly, the Commission has closed its file on this matter.

Should you have any further questions, please call Susan Donaldson at (202) 523-4073.

Sincerely,

William C. Oldaker
General Counsel

LAW OFFICES
BINDER, MOORE & HOWELL
511 EAST PEARL STREET
P.O. BOX 25
JACKSON, MISSISSIPPI 39205

January 15, 1979

ALVIN M. BINDER
RUSSELL D. MOORE, III
WILLIAM B. HOWELL
WILLIAM B. KIRKSEY
BOBBY B. DeLAUGHTER

RECEIVED
FEDERAL ELECTION
COMMISSION

79 JAN 19 PM 2:32

MILLARD M. BUSH (1968)
TELEPHONE
948-8800
AREA CODE 601

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

Re: MUR 813

Dear Mr. Oldaker:

On January 12, 1979, at approximately 10:00 a.m. Dr. Howard D. Clark received a letter from you under date of December 7, 1978. He promptly telephoned me and sent a copy of the letter to me which we received the morning of January 13, 1979. This morning I telephoned Mrs. Susan Donaldson to tell her of our receipt of the letter and our response. A copy of your letter is attached hereto as Exhibit "A".

I wish to advise that I will represent Dr. Howard D. Clark, Mr. Mike Amis and Mr. Benny Pittman in response to the matters complained of.

FIRST ALLEGATION: "It is alleged that you, Mike Amis and Benny Pittman, sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election Law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C., Sec. 441f)."

The allegation is denied by Messrs. Clark, Amis and Pittman as being inaccurate and not at all correct.

The Governor of Mississippi did not receive the democratic endorsement in his Senate race and as the records will reflect he had a deficit in excess of \$100,000.00 reported to the Federal Election Commission and filed appropriately with the Secretary of State of the State of Mississippi and with the Federal Election Commission.

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79040120032

Mr. William C. Oldaker
January 15, 1979
Page Two

A letter was mailed by the named individuals in the alleged complaint; however, the letter does not state that if one had contributed the maximum amount then that person could contribute in the name of his wife or children. The appropriate part of the letter that is relevant states as follows:

"If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100.00. However, this will not restrict your wife nor family from contributing should they desire to do so.

"We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days."

This letter containing the above statement is attached hereto as Exhibit "B".

The letter speaks for itself and does not in any manner imply what has been alleged.

SECOND ALLEGATION: "It is alleged that the Finch deficit was incorrectly reported as \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. Sec. 434(b)(12))."

The Governor Cliff Finch Campaign Committee has reported timely all debts of the campaign as compiled by the bookkeeper who was supervised by a certified public accounting firm. The only note obligations known and authorized by the Committee were as follows, to wit:

(a) On May 23, 1978, attached to the 10-day pre-runoff report covering a period of May 23 through June 12, was a letter of disclosure forwarded to the Secretary of the Senate indicating the names of individuals who had signed a letter of guarantee to the Mississippi Bank which was to stand good for payment for the Campaign Committee's telephone bills

Mr. William C. Oldaker
January 15, 1979
Page Three

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with South Central Bell Telephone Company should the campaign not pay these bills in full when due. Since the note was not carried by the Bank as an asset and, therefore, since the Committee did not list this on Schedule C, Debts and Obligations, when the guarantee was executed, Mr. Doug Patton advised that this could be construed a potential liability and should be handled by a letter of disclosure. This was accomplished and was always disclosed on each and every report sent to the Secretary of the Senate and filed with the Secretary of State of the State of Mississippi. Copy of the letter of disclosure of May 23, 1978, is attached as Exhibit "C".

(b) On June 14, 1978, a note was executed in the amount of \$20,000.00 payable to the Bank of Flora, Mississippi, with interest at the rate of eight (8) percent and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978. See disclosure letter of July 27, 1978, attached hereto as Exhibit "D".

(c) Open note in the amount of \$50,000.00 was executed June 13, 1978, with interest at the rate of nine (9) percent by the candidate, Governor Cliff Finch, to the Mississippi Bank and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978, and filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi. See copy of Debts and Obligations attached hereto as Exhibit "E".

(d) A note in the amount of \$5,522.00 payable to the First National Bank of Jackson was executed July 14, 1978, bearing interest at nine (9) percent and was disclosed to the Secretary of the Senate on the 30-day report following primary runoff and covered the period July 1 through July 17. A copy of the disclosure filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi is attached and designated Exhibit "F".

The term "Cliff Finch Deficit Fund" were the words utilized in the letter after the Governor's defeat and refers, I am informed, to the deficit that was reflected in the reports that

Mr. William C. Oldaker
January 15, 1979
Page Four

have been previously furnished. No other loans except those mentioned above, copies of the reports which have been attached, are known to the Committee.

The Campaign Committee paid the costs of the solicitation letter which was made appropriately on campaign stationery and Messrs. Clark, Amis and Pittman did not incur any independent expenditure on their part and nothing was done by them not in conjunction with the Campaign Committee. All expenditures for this letter, cost of paper, etc., has been properly reported in the bookkeeping entries furnished the FEC and the Secretary of State of the State of Mississippi.

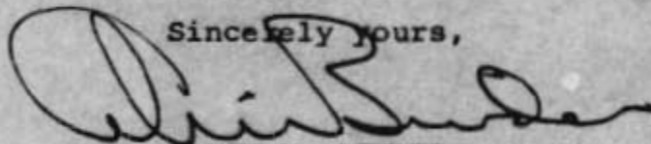
Dr. Howard D. Clark's residence address is 221 Second Street, Morton, Mississippi 39117; Mr. Jesse Mike Amis' address is 2219 Greenbriar, Jackson, Mississippi 39211; and Mr. Benny Pittman's address is 5495 Briarfield Road, Jackson, Mississippi 39211.

Dr. Clark's position in the Senate Campaign was that of treasurer; Mr. Amis' position was that of Chairman of the Campaign Committee; and Mr. Pittman's position in the campaign was that of Chairman of the Finance Committee. These positions were properly noticed on March 31, 1978, and May 24, 1978, filed with the Secretary of State of the State of Mississippi.

We hope that this fully responds to the issues presented and should you desire further information whatsoever, please do not hesitate to communicate same to the undersigned.

With respect, we remain

Sincerely yours,



ALVIN M. BINDER

AMB:ncb

Enclosures

cc Mrs. Susan Donaldson

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79040120035



FEDERAL ELECTION COMMISSION

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

December 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

ref to letter in our report
investigate & tell to SEC about
phantom deficit. we feel we will prepare

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4073.

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,

W. C. Oldaker

William C. Oldaker
General Counsel

790.40102043
79040120037

CLIFF FINCH



FOR UNITED STATES SENATE

August 7, 1978

Colonel William Gerald Fisher
2511 Buckner Avenue
Tupelo, Mississippi 38801

Dear William:

YOUR FRIEND, CLIFF FINCH, NEEDS YOUR HELP NOW!

On behalf of our Governor, we would like to express to you his appreciation for your loyalty, support, dedication, and, above all, your friendship. After the last election, Governor Finch called his staff together and asked each member to give rededication to their responsibilities so that even greater services might be rendered to the citizens of the State of Mississippi.

Our campaign has a deficiency in excess of \$100,000 and we must look to our friends to aid and assist in clearing up this campaign debt immediately. We have all agreed that each of us will contribute \$100 or more to the CLIFF FINCH SENATE DEFICIT FUND so that this debt may be reduced and cleared in order that it will not be of concern to the Governor as he continues his efforts for the people. If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100. However, this will not restrict your wife nor family from contributing should they desire to do so.

We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days. Please be sure to complete this receipt in its entirety, keeping the pink copy for your records, before returning it to us. This receipt must be signed.

Governor Finch and his family send their personal regards, best wishes and love to you and your family, who are all our dear friends.

Sincerely,

MIKE ARIS

HOWARD D. CLARK, R.D.

BENNY J. TITMAN

MA/HDC/SP/jm

1045 HIGH STREET JACKSON, MS 39205 PO BOX 22968 PHONE 354 3636

7 9 0 4 0 1 0 2 0 4 5
7 9 0 4 0 1 0 0 3 2
CLIFF FINCH



FOR
UNITED STATES
SENATE

May 23, 1978

Secretary of the Senate
119 "D" Street, N.E.
Washington, D.C. 20510

RE: Disclosure to 10 Day Pre-
Election Report

Sir:

The principal campaign committee wishes to disclose a guarantee agreement in the sum of \$15,000.00 which is to stand good for payment of the campaign committee's telephone bills to South Central Bell Telephone Company should the campaign not pay these bills in full when due.

The undersigned executed a note which may be called upon should the telephone bills not be paid aforesaid. The note is not carried by the bank as an asset and the committee did not list same on Schedule C, Debts and Obligations. When this guarantee was executed, a telephone call was made to Mr. Doug Patton in Washington who advises the committee from time to time, and it was explained that this could be construed as a potential liability and therefore a scrutiny of the signatories below will reflect that none have been allowed to contribute to the campaign.

Joseph David Hamlin
430 Boehle
Pearl, MS 39208

Howard D. Clark, M.D.
221 Second Street
Morton, MS 39117

Nathan Eugene McClintock
156 Glenstone Circle
Jackson, MS 39212

Jesse Mike Amis
2219 Greenbriar Drive
Jackson, MS 39211

B. G. Perry
1840-B Meadowbrook Drive
Jackson, MS 39211

Alvin M. Binder
4320 Deer Creek
Jackson, MS 39211

Thomas L. Wallace
Route 6, Box 89-B
Columbia, MS 39429

W. J. Caraway
1604 Belmont
Jackson, MS 39202

1045 HIGH STREET • JACKSON, MS 39205 • P.O. BOX 22968 • PHONE 354-3636

*This was attached to the 10-Day
Pre Runoff Report*

W. J. Caraway, May 23 - June 12

Exhibit C

Secretary of the Senate
May 23, 1978
Page 2

Milton York
625 Benning Road
Jackson, MS 39206

Jerry Howie
3569 Old Brandon Road, #3
Pearl, MS 39208

Charley Mac Jones
4311 Old Brandon Road
Jackson, MS 39208

Jackie Clark
221 Second Street
Morton, MS 39117

Donald Travis
3545 Forest Hill Road
Jackson, MS 39212

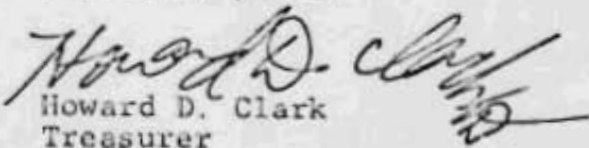
Norman Harris
6132 Whitestone Road
Jackson, MS 39206

E. C. Lloyd
37 Dickens Court
Jackson, MS 39206

Johnnie Moss Bush
227 Lakebend Circle
Brandon, MS 39042

We disclose this information pursuant to memo in the file that was made after discussion with Mr. Patton on how we should handle this and for your information purposes only.

Sincerely yours,


Howard D. Clark
Treasurer

7 9 0 4 0 1 0 2 0 4 7

THE
MISSISSIPPI BANK

POST OFFICE BOX 979, JACKSON, MISSISSIPPI 39208

March 30, 1978

SANFORD H. LEVINGS
VICE PRESIDENT

South Central Bell
P. O. Box 811
Jackson, Mississippi 39205

Attention: Ms. Marie Murphy

Dear Ms. Murphy:

The Mississippi Bank, Jackson, Mississippi, guarantees payment to South Central Bell on all charges, up to \$15,000, for telephone service provided to Governor Cliff Finch and billed to the following account numbers.

354-3636
354-3637
354-3640
354-3641

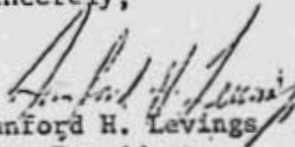
and on the following Wats numbers -

060-0504 (W 31-3099)
060-0507 (W 31-3100)
800-682-6421 (W 31-3098)

Should Governor Finch default in payment of these accounts prior to April 1, 1979, and upon presentation of the bills to us, The Mississippi Bank agrees to pay all charges, up to \$15,000, to South Central Bell immediately upon demand.

This agreement expires on April 1, 1979, and shall not be voided prior to that time, except by the mutual consent of The Mississippi Bank and South Central Bell.

Sincerely,


Sanford H. Levings
Vice President

SHL/EW

7 9 0 4 0 1 0 2 0 4 8

South Central Bell

P. O. Box 2218
221 East Capitol Street
Jackson, Mississippi 39205

July 14, 1978

The Mississippi Bank
P. O. Box 979
Jackson, Mississippi 39205

Dear Mr. Levings:

Enclosed is the bank letter of credit established by The Mississippi Bank for Cliff Finch covering his obligation of payment to South Central Bell during the recent political campaign.

Return of the above mentioned letter cancels The Mississippi Bank's obligation of payment of the telephone service outlined in the original letter of credit.

Sincerely,

Leslie Moore
Leslie Moore
Manager

7 9 0 4 0 1 2 0 0 1 1

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 90-day note in the amount of \$20,000.00 payable to the Bank of Flora, Flora, Mississippi:

Beth Stone
Route 3, Box 93-B
Florence, MS 39073

Charlie Graham
Route One
Collins, MS 39428

Kevin Sharpe
6300 Old Canton Road
Jackson, MS 39216

Lanee' Ashley
3569 Old Brandon Road, Apt. 107
Pearl, MS 39208

Herman Glazier
P. O. Box 368
Rolling Fork, MS 39159

Greg Brand
833 Briarwood Drive
Jackson, MS 39211

Mary Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Charles Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Pat Day
165 Kristen Court
Jackson, MS 39211

Walter Pol
5600 Keele Street, Apt. 1707
Jackson, MS 39206

Bill Kirksey
210 Briarwood, Apt. E-104
Jackson, MS 39206

Dave Hamlin
430 Boehle
Pearl, MS 39208

D

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee
for the United States Senate" Howard D. Clark, M.D. Treasurer.

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.

7 9 0 4 0 1 0 2 0 5 0

Secretary of the Senate

Page 2

July 27, 1978

Joe Stone
Route 3, Box 93-B
Florence, MS 39073

Wayne Lester
208 Bruce
Batesville, MS 38606

Ron Boutwell
Route One
Tupelo, MS 38801

Don Travis
3545 Forest Hill Road
Jackson, MS 39212

Mike Chrestman
337 Stonecastle
Jackson, MS 39208

Cathy Chrestman
337 Stonecastle
Jackson, MS 39208

Marsha Hilliard
621 Briarcliff Circle
Jackson, MS 39212

Mrs. Jerry Howie
3569 Old Brandon Road, Apt. 3
Pearl, MS 39208

This note, with interest at the rate of 8%, is due in full October 12, 1978.

Sincerely,



HOWARD D. CLARK, M. D.
TREASURER

HDC/js

7 9 0 4 0 1 0 2 0 5 0

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 1 of 13 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE UNITED STATES SENATE				
Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071	07-14-78	20,000.00		*341.92
☐ Primary ☐ General ☐ Other	09-30-78	\$ 20,000.00	\$ 3,000.00	\$ 17,000.00
NATURE OF OBLIGATION (Details of Debt) *Accrued interest. Open note executed on July 14, 1978, in the amount of \$20,000 payable to the Bank of Flora with interest at the rate of 8%. (Disclosure of loan reported in period of occurrence, 07/01 - 07/17)				
Internal Revenue Service Stop 13-A Atlanta, Ga 31101	09-30-78	\$ 1,169.23	\$ 20,027.14	\$ 1,169.23
☐ Primary ☐ General ☐ Other	NATURE OF OBLIGATION (Details of Debt) Payroll withholdings and taxes for the reporting period.			
The Mississippi Bank Box 979 Jackson, MS 39205	09-30-78	\$ 50,000.00	\$ -0-	*150.00 \$ 50,000.00
☐ Primary ☐ General ☐ Other	NATURE OF OBLIGATION (Details of Debt) *accrued interest. Open note in the amount of \$50,000 executed on June 13, 1978, with interest at the rate of 9%, due in full December 9, 1978. Note based on financial statement on Governor Cliff Finch. (Disclosure of loan reported in period of occurrence)			
SUBTOTALS this period this page (optional)		\$	\$	\$
TOTAL this period (last page this line number only).		\$	\$	\$
Carry outstanding balance only to appropriate line of summary				

These were included in the October 10
Quarterly Report for the period July 18-
Sept. 30, 1978.

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 30-day note in the amount of \$5,522.00 payable to the First National Bank of Jackson, Jackson, Mississippi:

Latrell Ashley
3569 Old Brandon Road
Apt. 107
Pearl, MS 39208

Warren Emfinger
General Delivery
Mount Olive, MS 39119

Alvin M. Binder
4320 Deer Creek Drive
Jackson, MS 39205

Anita Day
165 Kristen Court
Jackson, MS 39211

Kimsey K. Lawrence, Jr.
1000 Lakeshore Drive, Box 70
Brandon, MS 39042

Charles Jackson
4929 Oak Leaf Drive
Jackson, MS 39212

This note, with interest at the rate of 9%, is due in full August 14, 1978.

Sincerely,

HOWARD D. CLARK, M. D.
TREASURER

HDC/js

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee for the United States Senate" Howard D. Clark, M.D. Treasurer

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.

7 9 0 4 0 1 0 2 0 5 3

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

(Indicate Primary or General Election for each Entry)

Page 17 of 7 for

Line Number 13

(Use Separate Schedules for
each numbered line)

Name of Candidate and Committee in Full

GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U. S. SENATE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
The Honorable Cliff Finch
Governor of Ms.
20th Floor, Walter Sillers Bldg.
Jackson, MS 39205

Date (month,
day, year)

Amount of Original
Debt, Contract,
Agreement or
Promise

Cumulative
Payment
To Date

Outstanding
Balance at
Close of
This Period

☒ Primary

☐ General

☐ Other

06-13-78

\$50,000.00

\$ -0-

\$ 50,000.00

NATURE OF OBLIGATION (Details of Debt):

On 06-13-78, received \$50,000 open note at 9% interest based on financial statement of Gov. Finch. Payment due in full on December 9, 1978.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
Internal Revenue Service
Stop 13A
Atlanta, Ga. 31101

Date (month,
day, year)

Amount of Original
Debt, Contract,
Agreement or
Promise

Cumulative
Payment
To Date

Outstanding
Balance at
Close of
This Period

☒ Primary

☐ General

☐ Other

06-26-78

\$ 430.31

\$ 12,378.52

\$430.31

NATURE OF OBLIGATION (Details of Debt):

Payroll withholdings for reporting period.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
Telecom
P. O. Box 16892
Jackson, MS 39206

Date (month,
day, year)

Amount of Original
Debt, Contract,
Agreement or
Promise

Cumulative
Payment
To Date

Outstanding
Balance at
Close of
This Period

☒ Primary

☐ General

☐ Other

06-16-78

\$770.00

\$ -0-

\$770.00

NATURE OF OBLIGATION (Details of Debt):

Consultation services and creative writing, location videotaping/equipment and crew, master tape re television spots for Mrs. Cliff Finch.

SUBTOTALS this period this page (optional)

\$

\$

\$51,200.31

TOTAL this period (last page this line number only)

\$

\$

\$

Carry outstanding balance only to appropriate line of summary.

*This was included in the 30-Day Primary Report
for the period: June 13. June 26*

7 9 0 4 0 1 0 2 0 5 4

DEBTS AND OBLIGATIONS

Page 38 of 13 for

Supporting Line Numbers 12 and 13
of FEC FORM 3

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Governor Cliff Finch Campaign Committee for the United States Senate

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 20,000.00	\$ -0-	\$ 20,000.00

NATURE OF OBLIGATION (Details of Debt):

Ninety-day note at the rate of 8% interest due in full October 12, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
First National Bank of Jackson Box 291 Jackson, MS 39205				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 5,522.00	\$ -0-	\$ 5,522.00

NATURE OF OBLIGATION (Details of Debt):

Thirty-day note at the rate of 9% interest due in full August 14, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Jimmy Cagle Rt. 7, Box 332 Columbia, MS 39429	06-17-78 06-24-78	1,878.83 1,848.31		
☒ Primary ☐ General ☐ Other		\$	\$ 5,250.77	\$ 3,727.14

NATURE OF OBLIGATION (Details of Debt):

Aircraft rental

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only).	\$	\$	\$

Carry outstanding balance only to appropriate line of summary.

These notes were reported on the 30-Day Report following Primary Turn off and covered the period July 1 through July 17

LAW OFFICES

BINDER, MOORE & HOWELL

511 EAST PEARL STREET

P. O. BOX 25

JACKSON, MISSISSIPPI 39205

MISS

REGISTERED
1117248

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MS. SUSAN DONALDSON
FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463

CERTIFIED

No. 663253

MAIL

79 JUN 19 PM 2:32

RECEIVED
FEDERAL ELECTION
COMMISSION

QCC 9084

LAW OFFICES
BINDER, MOORE & HOWELL
511 EAST PEARL STREET
P. O. BOX 25
JACKSON, MISSISSIPPI 39205

79 JAN 18 PM 2:13

ALVIN M. BINDER
RUSSELL D. MOORE, III
WILLIAM B. HOWELL
WILLIAM B. KIRKSEY
BOBBY B. DeLAUGHTER

January 15, 1979

MILLARD M. BUSH (1968)
TELEPHONE
945-8800
AREA CODE 601

900313

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

Re: MUR 813

Dear Mr. Oldaker:

On January 12, 1979, at approximately 10:00 a.m. Dr. Howard D. Clark received a letter from you under date of December 7, 1978. He promptly telephoned me and sent a copy of the letter to me which we received the morning of January 13, 1979. This morning I telephoned Mrs. Susan Donaldson to tell her of our receipt of the letter and our response. A copy of your letter is attached hereto as Exhibit "A".

I wish to advise that I will represent Dr. Howard D. Clark, Mr. Mike Amis and Mr. Benny Pittman in response to the matters complained of.

FIRST ALLEGATION: "It is alleged that you, Mike Amis and Benny Pittman, sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election Law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C., Sec. 441f)."

The allegation is denied by Messrs. Clark, Amis and Pittman as being inaccurate and not at all correct.

The Governor of Mississippi did not receive the democratic endorsement in his Senate race and as the records will reflect he had a deficit in excess of \$100,000.00 reported to the Federal Election Commission and filed appropriately with the Secretary of State of the State of Mississippi and with the Federal Election Commission.

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79040120051

Mr. William C. Oldaker
January 15, 1979
Page Two

A letter was mailed by the named individuals in the alleged complaint; however, the letter does not state that if one had contributed the maximum amount then that person could contribute in the name of his wife or children. The appropriate part of the letter that is relevant states as follows:

"If you have contributed the maximum amount allowed by the FEC (\$2,000), then you will not be able to contribute this additional \$100.00. However, this will not restrict your wife nor family from contributing should they desire to do so.

"We are enclosing a form for the FEC so that you, your wife, children, or friends may contribute and we ask that you return it within the next five (5) days."

This letter containing the above statement is attached hereto as Exhibit "B".

The letter speaks for itself and does not in any manner imply what has been alleged.

SECOND ALLEGATION: "It is alleged that the Finch deficit was incorrectly reported as \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. Sec. 434(b)(12))."

The Governor Cliff Finch Campaign Committee has reported timely all debts of the campaign as compiled by the bookkeeper who was supervised by a certified public accounting firm. The only note obligations known and authorized by the Committee were as follows, to wit:

(a) On May 23, 1978, attached to the 10-day pre-runoff report covering a period of May 23 through June 12, was a letter of disclosure forwarded to the Secretary of the Senate indicating the names of individuals who had signed a letter of guarantee to the Mississippi Bank which was to stand good for payment for the Campaign Committee's telephone bills

Mr. William C. Oldaker
January 15, 1979
Page Three

79040102058
79040120052

with South Central Bell Telephone Company should the campaign not pay these bills in full when due. Since the note was not carried by the Bank as an asset and, therefore, since the Committee did not list this on Schedule C, Debts and Obligations, when the guarantee was executed, Mr. Doug Patton advised that this could be construed a potential liability and should be handled by a letter of disclosure. This was accomplished and was always disclosed on each and every report sent to the Secretary of the Senate and filed with the Secretary of State of the State of Mississippi. Copy of the letter of disclosure of May 23, 1978, is attached as Exhibit "C".

(b) On June 14, 1978, a note was executed in the amount of \$20,000.00 payable to the Bank of Flora, Mississippi, with interest at the rate of eight (8) percent and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978. See disclosure letter of July 27, 1978, attached hereto as Exhibit "D".

(c) Open note in the amount of \$50,000.00 was executed June 13, 1978, with interest at the rate of nine (9) percent by the candidate, Governor Cliff Finch, to the Mississippi Bank and was included in the October 10 Quarterly Report for the period July 18 through September 30, 1978, and filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi. See copy of Debts and Obligations attached hereto as Exhibit "E".

(d) A note in the amount of \$5,522.00 payable to the First National Bank of Jackson was executed July 14, 1978, bearing interest at nine (9) percent and was disclosed to the Secretary of the Senate on the 30-day report following primary runoff and covered the period July 1 through July 17. A copy of the disclosure filed with the Secretary of the Senate and the Secretary of State of the State of Mississippi is attached and designated Exhibit "F".

The term "Cliff Finch Deficit Fund" were the words utilized in the letter after the Governor's defeat and refers, I am informed, to the deficit that was reflected in the reports that

Mr. William C. Oldaker
January 15, 1979
Page Four

have been previously furnished. No other loans except those mentioned above, copies of the reports which have been attached, are known to the Committee.

The Campaign Committee paid the costs of the solicitation letter which was made appropriately on campaign stationery and Messrs. Clerk, Amis and Pittman did not incur any independent expenditure on their part and nothing was done by them not in conjunction with the Campaign Committee. All expenditures for this letter, cost of paper, etc., has been properly reported in the bookkeeping entries furnished the FEC and the Secretary of State of the State of Mississippi.

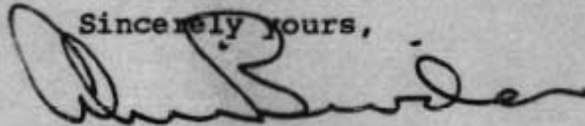
Dr. Howard D. Clark's residence address is 221 Second Street, Morton, Mississippi 39117; Mr. Jesse Mike Amis' address is 2219 Greenbriar, Jackson, Mississippi 39211; and Mr. Benny Pittman's address is 5495 Briarfield Road, Jackson, Mississippi 39211.

Dr. Clark's position in the Senate Campaign was that of treasurer; Mr. Amis' position was that of Chairman of the Campaign Committee; and Mr. Pittman's position in the campaign was that of Chairman of the Finance Committee. These positions were properly noticed on March 31, 1978, and May 24, 1978, filed with the Secretary of State of the State of Mississippi.

We hope that this fully responds to the issues presented and should you desire further information whatsoever, please do not hesitate to communicate same to the undersigned.

With respect, we remain

Sincerely yours,



ALVIN M. BINDER

AMB:ncb

Enclosures

cc Mrs. Susan Donaldson

79040102059
79040120059



FEDERAL ELECTION COMMISSION

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

December 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

re: letter in our report
Investigate staff to SEC about
alleged deficit. We feel we will proper

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4073.

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,

W. C. Oldaker

William C. Oldaker
General Counsel

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CLIFF FINCH



FOR UNITED STATES SENATE

May 23, 1978

Secretary of the Senate
119 "D" Street, N.E.
Washington, D.C. 20510

RE: Disclosure to 10 Day Pre-
Election Report

Sir:

The principal campaign committee wishes to disclose a guarantee agreement in the sum of \$15,000.00 which is to stand good for payment of the campaign committee's telephone bills to South Central Bell Telephone Company should the campaign not pay these bills in full when due.

The undersigned executed a note which may be called upon should the telephone bills not be paid aforesaid. The note is not carried by the bank as an asset and the committee did not list same on Schedule C, Debts and Obligations. When this guarantee was executed, a telephone call was made to Mr. Doug Patton in Washington who advises the committee from time to time, and it was explained that this could be construed as a potential liability and therefore a scrutiny of the signatories below will reflect that none have been allowed to contribute to the campaign.

Joseph David Hamlin
430 Boehle
Pearl, MS 39208

Howard D. Clark, M.D.
221 Second Street
Morton, MS 39117

Nathan Eugene McClintock
156 Glenstone Circle
Jackson, MS 39212

Jesse Mike Amis
2219 Greenbriar Drive
Jackson, MS 39211

B. G. Perry
1840-B Meadowbrook Drive
Jackson, MS 39211

Alvin M. Binder
4320 Deer Creek
Jackson, MS 39211

Thomas L. Wallace
Route 6, Box 89-B
Columbia, MS 39429

W. J. Caraway
1604 Belmont
Jackson, MS 39202

790401020057

Secretary of the Senate
May 23, 1978
Page 2

Milton York
625 Benning Road
Jackson, MS 39206

Jerry Howie
3569 Old Brandon Road, #3
Pearl, MS 39208

Charley Mac Jones
4311 Old Brandon Road
Jackson, MS 39208

Jackie Clark
221 Second Street
Morton, MS 39117

Donald Travis
3545 Forest Hill Road
Jackson, MS 39212

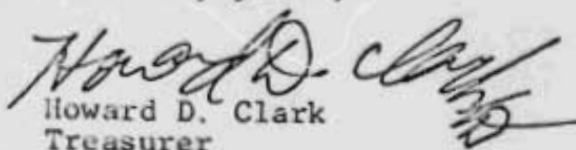
Norman Harris
6132 Whitestone Road
Jackson, MS 39206

E. C. Lloyd
37 Dickens Court
Jackson, MS 39206

Johnnie Moss Bush
227 Lakebend Circle
Brandon, MS 39042

We disclose this information pursuant to memo in the file that was made after discussion with Mr. Patton on how we should handle this and for your information purposes only.

Sincerely yours,


Howard D. Clark
Treasurer

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South Central Bell

P. O. Box 2218
221 East Capitol Street
Jackson, Mississippi 39205

July 14, 1978

The Mississippi Bank
P. O. Box 979
Jackson, Mississippi 39205

Dear Mr. Levings:

Enclosed is the bank letter of credit established by The Mississippi Bank for Cliff Finch covering his obligation of payment to South Central Bell during the recent political campaign.

Return of the above mentioned letter cancels The Mississippi Bank's obligation of payment of the telephone service outlined in the original letter of credit.

Sincerely,

Leslie Moore
Leslie Moore
Manager

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7 9 0 4 0 1 0 2 0 6 6

THE
MISSISSIPPI BANK
POST OFFICE BOX 979, JACKSON, MISSISSIPPI 39208

March 30, 1978

SANFORD H. LEVINGS
VICE PRESIDENT

South Central Bell
P. O. Box 811
Jackson, Mississippi 39205

Attention: Ms. Marie Murphy

Dear Ms. Murphy:

7 9 0 4 0 1 2 0 0 6 6

The Mississippi Bank, Jackson, Mississippi, guaranties payment to South Central Bell on all charges, up to \$15,000, for telephone service provided to Governor Cliff Finch and billed to the following account numbers.

354-3636
354-3637
354-3640
354-3641

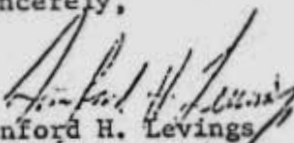
and on the following Wats numbers -

060-0504 (W 31-3099)
060-0507 (W 31-3100)
800-682-6421 (W 31-3098)

Should Governor Finch default in payment of these accounts prior to April 1, 1979, and upon presentation of the bills to us, The Mississippi Bank agrees to pay all charges, up to \$15,000, to South Central Bell immediately upon demand.

This agreement expires on April 1, 1979, and shall not be voided prior to that time, except by the mutual consent of The Mississippi Bank and South Central Bell.

Sincerely,


Sanford H. Levings
Vice President

SHL/mw

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 90-day note in the amount of \$20,000.00 payable to the Bank of Flora, Flora, Mississippi:

Beth Stone
Route 3, Box 93-B
Florence, MS 39073

Charlie Graham
Route One
Collins, MS 39428

Kevin Sharpe
6300 Old Canton Road
Jackson, MS 39216

Lanee¹ Ashley
3569 Old Brandon Road, Apt. 107
Pearl, MS 39208

Herman Glazier
P. O. Box 368
Rolling Fork, MS 39159

Greg Brand
833 Briarwood Drive
Jackson, MS 39211

Mary Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Charles Moore
917 Harding Street, Apt. A-13
Jackson, MS 39202

Pat Day
165 Kristen Court
Jackson, MS 39211

Walter Pol
5600 Keele Street, Apt. 1707
Jackson, MS 39206

Bill Kirksey
210 Briarwood, Apt. E-104
Jackson, MS 39206

Dave Hamlin
430 Boehle
Pearl, MS 39208

D

1045 HIGH STREET · JACKSON, MS 39205 · P.O. BOX 22968 · PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee
for the United States Senate." Howard D. Clark, M.D. Treasurer.

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.

7 9 0 4 0 1 0 2 0 6 8

Secretary of the Senate

Page 2

July 27, 1978

Joe Stone
Route 3, Box 93-B
Florence, MS 39073

Ron Boutwell
Route One
Tupelo, MS 38801

Mike Chrestman
337 Stonecastle
Jackson, MS 39208

Marsha Hilliard
621 Briarcliff Circle
Jackson, MS 39212

Wayne Lester
208 Bruce
Eatesville, MS 38606

Don Travis
3545 Forest Hill Road
Jackson, MS 39212

Cathy Chrestman
337 Stonecastle
Jackson, MS 39208

Mrs. Jerry Howie
3569 Old Brandon Road, Apt. 3
Pearl, MS 39208

This note, with interest at the rate of 8%, is due in full October 12, 1978.

Sincerely,


HOWARD D. CLARK, M. D.
TREASURER

HDC/js

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7 9 0 4 0 1 0 2 0 6 2
7 9 0 4 0 1 2 0 0 6 3

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 1 of 13 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full
GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE UNITED STATES SENATE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071	07-14-78	20,000.00		*341.92
☐ Primary ☐ General ☐ Other	09-30-78	\$ 20,000.00	\$ 3,000.00	\$ 17,000.00

NATURE OF OBLIGATION (Details of Debt)

*Accrued interest. Open note executed on July 14, 1978, in the amount of \$20,000 payable to the Bank of Flora with interest at the rate of 8%. (Disclosure of loan reported in period of occurrence, 07/01 - 07/17)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Internal Revenue Service Stop 13-A Atlanta, Ga 31101				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 1,169.23	\$ 20,027.14	\$ 1,169.23

NATURE OF OBLIGATION (Details of Debt)

Payroll withholdings and taxes for the reporting period.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
The Mississippi Bank Box 979 Jackson, MS 39205				
☐ Primary ☐ General ☐ Other	09-30-78	\$ 50,000.00	\$ -0-	*150.00 \$ 50,000.00

NATURE OF OBLIGATION (Details of Debt)

*accrued interest.
Open note in the amount of \$50,000 executed on June 13, 1978, with interest at the rate of 9%, due in full December 9, 1978. Note based on financial statement on Governor Cliff Finch. (Disclosure of loan reported in period of occurrence)

SUBTOTALS (this period this page (optional))	\$	\$	\$
TOTAL (this period (last page this line number only))	\$	\$	\$

Carry outstanding balance only to appropriate line of summary

*These were included in the October 10
Quarterly Report for the period July 18-
Sept. 30, 1978.*

CLIFF FINCH



FOR UNITED STATES SENATE

July 27, 1978

Secretary of the Senate
119 D Street, N. E.
Washington, D. C. 20510

Dear Sir:

RE: Disclosure of Loan

On July 14, 1978, the undersigned executed a 30-day note in the amount of \$5,522.00 payable to the First National Bank of Jackson, Jackson, Mississippi:

Latrelle Ashley
3569 Old Brandon Road
Apt. 107
Pearl, MS 39208

Warren Enfinger
General Delivery
Mount Olive, MS 39119

Alvin M. Binder
4320 Deer Creek Drive
Jackson, MS 39205

Anita Day
165 Kristen Court
Jackson, MS 39211

Kimsey K. Lawrence, Jr.
1000 Lakeshore Drive, Box 70
Brandon, MS 39042

Charles Jackson
4929 Oak Leaf Drive
Jackson, MS 39212

This note, with interest at the rate of 9%, is due in full August 14, 1978.

Sincerely,

HOWARD D. CLARK, M. D.
TREASURER

HDC/jjs

F
1045 HIGH STREET • JACKSON, MS 39205 • P.O. BOX 22968 • PHONE 354-3636

Authorized and paid for by "Governor Cliff Finch Campaign Committee
for the United States Senate" Howard D. Clark, M.D. Treasurer

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.

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DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 13 of 7 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U. S. SENATE

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
The Honorable Cliff Finch
Governor of Ms.
20th Floor, Walter Sillers Bldg.
Jackson, MS 39205

Date (month,
day, year)

Amount of Original
Debt, Contract,
Agreement or
Promise

Cumulative
Payment
To Date

Outstanding
Balance at
Close of
This Period

☒ Primary

☐ General

☐ Other

06-13-78

\$50,000.00

\$ -0-

\$ 50,000.00

NATURE OF OBLIGATION (Details of Debt):

On 06-13-78, received \$50,000 open note at 9% interest based on financial statement of Gov. Finch. Payment due in full on December 9, 1978.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
Internal Revenue Service
Stop 13A
Atlanta, Ga. 31101

Date (month,
day, year)

Amount of Original
Debt, Contract,
Agreement or
Promise

Cumulative
Payment
To Date

Outstanding
Balance at
Close of
This Period

☒ Primary

☐ General

☐ Other

06-26-78

\$ 430.31

\$ 12,378.52

\$430.31

NATURE OF OBLIGATION (Details of Debt):

Payroll withholdings for reporting period.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor
Telecom
P. O. Box 16892
Jackson, MS 39206

Date (month,
day, year)

Amount of Original
Debt, Contract,
Agreement or
Promise

Cumulative
Payment
To Date

Outstanding
Balance at
Close of
This Period

☒ Primary

☐ General

☐ Other

06-16-78

\$770.00

\$ -0-

\$770.00

NATURE OF OBLIGATION (Details of Debt):

Consultation services and creative writing, location videotaping/equipment and crew, master tape re televiaion spots for Mrs. Cliff Finch.

SUBTOTALS this period this page (optional)

\$

\$

\$51,200.31

TOTAL this period (last page this line number only)

\$

\$

\$

Carry outstanding balance only to appropriate line of summary.

*This was included in the 30-Day Primary Report
for the period: June 13. June 26*

DEBTS AND OBLIGATIONS

Supporting Line Numbers 12 and 13
of FEC FORM 3

Page 38 of 13 for

Line Number 13

(Use Separate Schedules for
each numbered line)

(Indicate Primary or General Election for each Entry)

Name of Candidate and Committee in Full

Governor Cliff Finch Campaign Committee for the United States Senate

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Bank of Flora Box 219 Flora, MS 39071				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 20,000.00	\$ -0-	\$ 20,000.00

NATURE OF OBLIGATION (Details of Debt):

Ninety-day note at the rate of 8% interest due in full October 12, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
First National Bank of Jackson Box 291 Jackson, MS 39205				
☒ Primary ☐ General ☐ Other	06-14-78	\$ 5,522.00	\$ -0-	\$ 5,522.00

NATURE OF OBLIGATION (Details of Debt):

Thirty-day note at the rate of 9% interest due in full August 14, 1978. (See attachment to report for further details)

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Jimmey Cagle Rt. 7, Box 332 Columbia, MS 39429	06-17-78 06-24-78	1,878.83 1,848.31		
☒ Primary ☐ General ☐ Other		\$ 3,727.14	\$ 5,250.77	\$ 3,727.14

NATURE OF OBLIGATION (Details of Debt):

Aircraft rental

SUBTOTALS this period this page (optional)	\$	\$	\$
TOTAL this period (last page this line number only).	\$	\$	\$

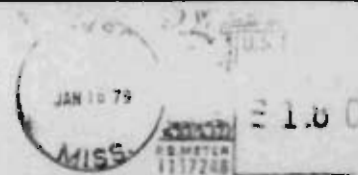
Carry outstanding balance only to appropriate line of summary.

*These notes were reported on the 30-Day
Report following primary term of and covered the
period July 1 through July 17*

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7 9 0 4 0 1 2 0 0 6 7

LAW OFFICES
BINDER, MOORE & HOWELL
511 EAST PEARL STREET
P. O. BOX 25
JACKSON, MISSISSIPPI 39205



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



79 JAN 10 11 21

FEDERAL ELECTION COMMISSION



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO

CHARLES STEELE

FROM:

MARJORIE W. EMMONS *MWE*

DATE:

JANUARY 15, 1979

SUBJECT:

MUR 813 - Interim Investigative
Report dated 1-2-79: Signed 1-11-79
Received in OCS1-12-79, 10:47

The above-named document was circulated on a 24
hour no-objection basis at 3:30, January 12, 1979.

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

79040102074
79040120063

January 12, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MJR 813

Please have the attached Interim Invest Report on
MUR 813 distributed to the Commission.

Thank you.

79040102075
79040120069

BEFORE THE FEDERAL ELECTION COMMISSION
January 2, 1979

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 JAN 5 P 1: 26

In the Matter of)
Governor Cliff Finch)
for U.S. Senate Campaign)
Committee)

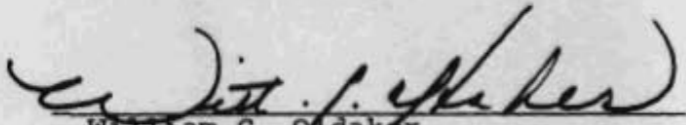
MUR 813

INTERIM INVESTIGATIVE REPORT

The allegations in this matter are that the Governor Cliff Finch for U.S. Senate Campaign Committee ("the Committee") may have violated 2 U.S.C. §441f in connection with an alleged solicitation letter; and 2 U.S.C. §434(b)(12) in connection with alleged unreported loans. The Commission found reason to believe on December 6, 1978, and the notification letter was sent on December 7, 1978.

After the return receipt card was not returned and there was no response from the Committee; Dr. Howard Clark, treasurer of the Committee, was contacted. Dr. Clark had not received the Commission's letter, and the Committee's address had been changed. The reason to believe notification letter was resent on December 29, 1978, and a response is expected shortly.

1/11/79
Date


William C. Oidaker
General Counsel

79 JAN 12 A 10: 47

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79040102076
79040120070



FEDERAL ELECTION COMMISSION

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

December 7, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it is alleged that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to an alleged Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit was incorrectly reported at \$136,582 and is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

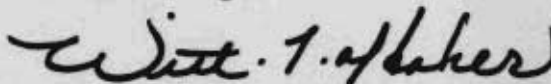
The Commission is under a duty to investigate this matter expeditiously. Therefore, your response should be submitted within ten days after your receipt of this notification.

If you have any questions, please contact Susan Donaldson, the staff member assigned to this matter, at 202-523-4073.

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

79040102078
79040120072

77990044001200200779

DONALDSON - MUR 513

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 \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO
Dr Howard Clark
221 Second Street
Morton, Miss 39117

3. ARTICLE DESCRIPTION
REGISTERED NO. CERTIFIED NO. INSURED NO.
943448

(Always obtain signature of addressee or agent)

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

4. *Dr. Howard Clark, D. Legum*
DATE OF DELIVERY POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS
Bk

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Governor Cliff Finch for)
U. S. Senate Campaign)
Committee)

MUR 813

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 6, 1978, the Commission, meeting in an executive session at which a quorum was present, determined by a vote of 5-1 to adopt the recommendation of the General Counsel to take the following actions in MUR 813:

1. Find reason to believe that the Governor Cliff Finch for U. S. Senate Campaign Committee may have violated 2 U.S.C. §441f and 2 U.S.C. §434(b) (12).
2. Send the letter attached to the First General Counsel's Report in this matter.

Commissioners Aikens, Harris, Springer, Thomson, and Tiernan voted affirmatively for the above determinations. Commissioner McGarry dissented.

Attest:

12/6/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: DECEMBER 5, 1978
SUBJECT: MUR 813 - First General Counsel's
Report dated 12-1-78
Received in OCS: 12-1-78,
10:27

The above-named document was circulated on a
48 hour vote basis at 2:30, December 1, 1978.

Commissioner McGarry submitted an objection
at 9:58, December 5, 1978, thereby placing MUR 813
on the Amended Agenda for December 6, 1978.

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

79040102081
79040120073

48 HOUR TALLY SHEET



FEDERAL ELECTION COMMISSION

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

2.48 12/1/78
RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
7 DEC 5 9:58

Date and Time Transmitted: Dec. 1, 1978 - 2:30

Commissioner SPRINGER, AIKENS, TIERNAN, MCGARRY, THOMSON, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: December 5, 1978 - 2:30

MUR No. 813 First General Counsel's Report, dated 12-1-78

☒ I approve the recommendation
☐ I object to the recommendation

COMMENTS:

For discussion
compare to MUR 778

Date:

12/5/78

Signature:

John W. McGarry

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.



December 1, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 813

Please have the attached ~~Fate~~ General Counsel's
Report on MUR 813 distributed to the Commission on a
48 hour tally basis.

Thank you.

79040102083
79040120077

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION DEC 1 1978

78 NOV 31 10:27
MUR NO. 815
STAFF MEMBER(S)

Donaldson

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Governor Cliff Finch for U.S. Senate
Campaign Committee

RELEVANT STATUTE: 2 U.S.C. §441f
2 U.S.C. §434(b) (12)

INTERNAL REPORTS CHECKED: Governor Cliff Finch for U.S. Senate
Campaign Committee

FEDERAL AGENCIES CHECKED:

GENERATION OF MATTER

Reports Analysis referred this matter to the Office of General Counsel on September 19, 1978. The referral was based on a newspaper article which alleged that the Governor Cliff Finch for U.S. Senate Campaign Committee ("the Committee") violated 2 U.S.C. §441f and 2 U.S.C. §434(b) (12). The Commission, on November 2, 1978, voted to open a MUR on this matter in order that the Committee may be questioned in regard to the allegations.

EVIDENCE

The newspaper article which appeared in the Delta Democrat on August 27, 1978, stated that three named individuals involved with Governor Finch sent out letters requesting contributions to the Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children. The article also alleges that the Finch deficit, reported at \$136,582, is actually \$300,000.

A review of the Governor Cliff Finch for U.S. Senate Campaign Committee reports revealed no indication of either the Cliff Finch Senate Deficit Fund or the subject solicitation letters. Reports Analysis also confirmed that the Committee reported outstanding debts of \$151,185.75 rather than the alleged \$300,000.

PRELIMINARY ANALYSIS

2 U.S.C. §441f prohibits the making of contributions in the names of others and the knowing acceptance of such contributions. The letter reported in the article invited people to make contributions in violation of this section.

2 U.S.C. §434(b) (12) requires that campaign reports shall disclose the amount and nature of debts and obligations owed by or to the Committee. The article reported that the Finch deficit was substantially greater than the amount the Finch Committee had reported. This would indicate a possible violation of §434(b) (12).

RECOMMENDATION

Find reason to believe that the Governor Cliff Finch for U.S. Senate Campaign Committee may have violated 2 U.S.C. §441f and 2 U.S.C. §434(b) (12). Send attached letter.

Attachments

1. Referral from Reports Analysis Division
2. Proposed letter to Respondent

790401020079
790401020079



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: William C. Oldaker

September 19, 1978

THROUGH: Orlando B. Potter *OP*

FROM: Tom Haselhorst *TH*

SUBJECT: Newspaper article concerning debt retirement for Senate candidate, Governor Cliff Finch. See attached.

After an in-depth analysis of the Governor Cliff Finch Campaign Committee for the U.S. Senate reports (through July 10, 1978), the following information from the attached newspaper article has been verified:

1. A loan from the Bank of Mississippi has been endorsed by Governor Cliff Finch in the amount of \$50,000 and is due on December 9, 1978.
2. As of the July 10 Report, the committee reports a negative cash on hand of \$39,421.79. (A request for additional information has been sent)
3. As of the July 10 Report, the committee reports outstanding debts of \$151,185.75 (including the \$50,000 bank loan endorsed by the candidate).

At this point, the reports from the Governor Cliff Finch for U.S. Senate Campaign Committee do not reflect the activity mentioned in the attached newspaper article (Cliff Finch Senate Deficit Fund, solicitation letters, deficit figure of \$300,000).

This newspaper article indicates a possible violation of 2 U.S.C. 441f (prohibition of contributions in the name of another) as well as 2 U.S.C. 434(b)(12)

In accordance with our interpretation of the Staff Director's May 10 1978 Memorandum concerning Procedures for the Handling of Internally Generated Matters, this information is being forwarded to your office for review and submission to the Commission for possible MUR determination.



Finch money went as far

Delta Democrat-Times 1/27/78

JACKSON—Cliff Finch, who not long ago had all the campaign money any politician in Mississippi would ever want, evidently has fallen on hard times.

Letters have gone out to most, if not all, of the governor's more than 7,000 colonels asking for \$100 contributions to the "Cliff Finch Senate Deficit Fund," which the letter says is "in excess of \$100,000."

This \$100, say the letters, would be in addition to anything you may have already given to the ill-fated Senate race. And if you've already given the \$2,000 maximum permitted by the Federal Election law, says the letter, then you can give in the name of your wife or kids.

Signing the letter are Mike Amis, Dr. Howard Clark and Benny Pittman. Amis and Clark have been visible in the Finch administration in various public posts, while Pittman, Finch's behind-the-scenes money man of varied business pursuits, has not. Pittman, however, is the keeper of the

bill minor

list of colonels, and also the keeper of the highly secretive colonels' fund, both of which have been kept from public view.

The colonels' list, as a matter of fact, is kept computerized in Dallas, Texas. For the first time since governors started having honorary colonels many years ago, the Finch colonels names will not appear in the state's official Blue Book soon to be issued by Secretary of State Heber Lathier. The reason is that the Finch folks wouldn't provide it.

In their letter, Amis, Clark and Pittman say that the Finch campaign deficit needs to be cleared so it won't bother the governor as he "continues his efforts for the people."

There are unconfirmed reports from

banking circles that the Finch deficit, which had been reported at \$136,582 in the official campaign filing, actually runs \$300,000 when all the loans made around the state are thrown in.

Finch himself secured a \$50,000 open note with Mississippi Bank during the second primary, and that note comes due on Dec. 9. Also deep in the Finch campaign reports is a \$39,421.78 second primary bank overdraft at Mississippi Bank.

That whopping overdraft revives memories of the Bert Lance case, and probably confirms the average bank customer's suspicions that people with political influence get special treatment.

Everything was rosy for the Finch campaign folks back before the June 6 primary when money was flowing like Pearl River, especially the \$1,000 checks from bankers and business people who were afraid of being left at the depot when the "Cliff Finch Train" pulled out.

Now, it is evident that the money

MISSISSIPPI

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ist as it came

was being spent just about as freely as it was rolling in, and that's the problem.

Those who watch such things carefully could hardly comprehend how Finch spent more than \$420,000 reported as campaign expenses for the first primary, particularly since he never launched the media blitz that was expected.

What became evident from studying the expense reports is that Finch had very few volunteers around his campaign headquarters and out in the field.

He was having to lay out hard cash for workers to do his canvassing and to round up people to go to the polls, something that most candidates try to get volunteers to do.

After Finch's dismal showing in the first primary, the \$1,000 contributions from a lot of business types noticeably dropped off as many began to bail out before the train crashed.

The drive to generate enough money out of his "good friends" to pay off

the Senate campaign deficit should be an interesting test of how much loyalty Finch as a lame duck governor can still generate from his recent fanatical following.

There's no doubt that Finch refuses to accept the possibility his political career is at an end because of the trouncing he got in the senatorial runoff. Hence his concerted effort to change his image through the media and introduce a new openness and candor in his administration.

Word is already going around that Finch is going to run for something in 1979, because he must keep his hand in politics in order to stay alive. It may even be for the state legislature in his home district. That would give him a forum to continue to press for gubernatorial succession.

There also is a precedent for moving from the governor's office to the legislature. J.P. Coleman did it, and so did Hugh White.

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8 8 0 2 0 1 0 4 0 6 8



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dr. Howard D. Clark
Treasurer
Governor Cliff Finch
for U.S. Senate Campaign
Committee
P. O. Box 22968
Jackson, Mississippi 39205

Re: MUR 813

Dear Dr. Clark:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your committee, the Governor Cliff Finch for U.S. Senate Campaign Committee, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that you, Mike Amis and Benny Pittman sent out letters soliciting contributions to the Cliff Finch Senate Deficit Fund. The alleged letter stated that if you had already contributed the maximum amount allowed by Federal Election law, then you could contribute in the name of your wife or children (in violation of 2 U.S.C. §441f). It is also alleged that the Finch deficit, reported at \$136,582, is actually \$300,000 when all the loans around the State are included (in violation of 2 U.S.C. §434(b)(12)). We have numbered this matter MUR 813.

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 should include a description of the "Cliff Finch Deficit Fund"; any solicitation

Dr. Howard D. Clark
Page Two

letters sent out by you and Messrs. Amis and Pittman, the addresses of these men and their positions within the Finch campaign; and any loans not previously reported. Where appropriate, statements should be submitted under oath.

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 202-523-4073.

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

79040102090
79040120081



FEDERAL ELECTION COMMISSION

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

Dr. Howard D. Clark, Treasurer
Governor Cliff Finch Campaign Committee
For The U.S. Senate
Post Office Box 22968
Jackson, MS 39205

Dear Dr. Clark,

This letter is prompted by our interest in assisting Senate candidates and committees who wish to comply with the Federal Election Campaign Act.

30 Day Post Primary

During review of the October 10 Quarterly Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Secretary of the Senate, Office of Public Records, 119 D Street, N.E., Washington, D.C. 20510, with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact Susan Weber in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12



79040102092
79040120086

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

CF/5

TO: GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR
THE U.S. SENATE MS

DATE: _____
I.D. NO.: C00091173

REQUEST FOR ADDITIONAL INFORMATION FOR THE OCTOBER 10 QUARTERLY REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 7/18/78 THROUGH 9/30/78, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

___ Coverage Dates: ___ omitted or ___ incorrect

___ Summary Page Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Detailed Summary (Page 2) Line(s): ___ Column(s): ___ Totals: ___ ___ omitted or ___ incorrect

___ Schedule Totals: ___ disagree with Detailed Summary (Page 2) or ___ omitted

___ Date(s): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Full Name(s)/Mailing Address(es): ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Occupation/Principal Place(s) of Business: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Election Designation: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Aggregate Year-to-Date Totals: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Expenditure: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Nature or Purpose of Receipt: ___ omitted or ___ inadequate for Schedule(s) ___ Line(s) ___

___ Inadequate Description of: ___ proceeds ___ dates ___ events ___ location of Schedule

___ Signature: ___ omitted ___ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

☒ Other: Schedule C, Line 13 itemizes debts and obligations owed by the committee. Please be advised that loans or debts itemized on Schedule C should reflect the original
(continued on page two)

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U.S. SENATE

REQUEST FOR ADDITIONAL INFORMATION

PAGE TWO

(continued from page one)

amount, cumulative payment(s) to date, and outstanding balance(s). Please amend your report to include the original amount of debts, contracts, agreements or promises, cumulative payment(s) to date, and outstanding balance(s).

Please be advised that any outstanding debt or obligation owed by the committee that is in the amount of \$500 or more must be reported on Schedule C. In addition, any debt or obligation in the amount of \$500 or less and is outstanding for sixty(60) days or more must be reported on Schedule C.

79040102094
79040120088

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

CF/5

TO: GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE

DATE: _____

FOR THE U.S. SENATE

MS

I.D. NO.: C00091173

REQUEST FOR ADDITIONAL INFORMATION FOR THE 30 DAY POST PRIMARY REPORT OF RECEIPTS AND EXPENDITURES COVERING THE PERIOD 7/1/78 THROUGH 7/17/78, PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

☐ Coverage Dates: ☐ omitted or ☐ incorrect

☐ Summary Page Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect

☒ Detailed Summary (Page 2) Line(s): ☐ Column(s): ☐ Totals: ☐ omitted or ☐ incorrect

☒ Schedule Totals: ☐ disagree with Detailed Summary (Page 2) or ☐ omitted

☒ Date(s): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Full Name(s)/Mailing Address(es): ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Occupation/Principal Place(s) of Business: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Election Designation: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Aggregate Year-to-Date Totals: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Nature or Purpose of Expenditure: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Nature or Purpose of Receipt: ☐ omitted or ☐ inadequate for Schedule(s) ☐ Line(s) ☐

☒ Inadequate Description of: ☒ proceeds ☒ dates ☒ events ☒ location of Schedule

☒ Signature: ☐ omitted ☐ inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

☒ Other: Entries on Schedule B, Line 20 indicate possible fundraising activity sponsored by your committee during the 30 Day Post-Primary reporting period. Please be
(continued on page two)

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.

GOVERNOR CLIFF FINCH CAMPAIGN COMMITTEE FOR THE U.S. SENATE

REQUEST FOR ADDITIONAL INFORMATION

PAGE TWO

(continued from page one)

advised that 2 U.S.C. 434(b)(6) and Section 104.2(b)(6) of the FEC Regulations requires disclosure of all fundraising events, to include the total gross proceeds, date(s) and location(s) of the event(s). This information should be reported on Schedule D and the total entered as a memo entry on Line 14(c) of the Detailed Summary Page. In addition, any receipt in excess of \$100 must be itemized on a separate Schedule A and included in the total of itemized receipts on Line 14(a) of the Detailed Summary Page. Receipts of less than \$100 must be included in the total of unitemized receipts on Line 14(b) of the Detailed Summary Page. Please amend your report accordingly to reflect this activity.

Schedule C, Line 13 itemizes debts and obligations owed by the committee. Please be advised that loans or debts itemized on Schedule C should reflect the original amount, cumulative payment(s) to date, and outstanding balance(s). Please amend your report to include the original amount of debts, contracts, agreements or promises, cumulative payment(s) to date, and outstanding balance(s).

Please be advised that any outstanding debt or obligation owed by the committee that is in the amount of \$500 or more must be reported on Schedule C. In addition, any debt or obligation in the amount of \$500 or less and is outstanding for sixty (60) days or more must be reported on Schedule C.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Governor Cliff Finch) PRE-MUR 13
Campaign Committee for the)
U. S. Senate (Mississippi))

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on November 2, 1978, the Commission determined by a vote of 4-0 to adopt the recommendation, as set forth in the General Counsel's memorandum dated October 30, 1978, that a MUR should be opened in order that the Commission may question the Governor Cliff Finch for U.S. Senate Campaign Committee in connection with this matter.

Voting for this determination were Commissioners Springer, Tiernan, Thomson, and Harris.

Attest:

11/2/78
Date

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

Received in Office of Commission Secretary: 10-30-78, 1:23
Circulated on 48 hour vote basis: 10-31-78, 4:00

790401020097
79040120091

October 30, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: Pre MUR 13

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis.

Thank you.

79040102098
79040120092



FEDERAL ELECTION COMMISSION

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

78 OCT 30 P 1: 23

October 30, 1978

MEMORANDUM

TO: The Commission

FROM: William C. Oldaker *W.C. Oldaker*

SUBJECT: Pre-MUR 13 - Governor Cliff Finch Campaign
Committee for the U.S. Senate (Mississippi)

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79040120094

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FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: William C. Oldaker

September 19, 1978

THROUGH: Orlando B. Potter *OBP*

FROM: Tom Haselhorst *TH*

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In accordance with our interpretation of the Staff Director's May 10 1978 Memorandum concerning Procedures for the Handling of Internally Generated Matters, this information is being forwarded to your office for review and submission to the Commission for possible MUR determination.



Finch money went as fast

Delta Democrat-Times 1/27/78

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bill minor

list of colonels, and also the keeper of the highly secretive colonels' fund, both of which have been kept from public view.

The colonels' list, as a matter of fact, is kept computerized in Dallas, Texas. For the first time since governors started having honorary colonels many years ago, the Finch colonels names will not appear in the state's official Blue Book soon to be issued by Secretary of State Heber Lusher. The reason is that the Finch folks wouldn't provide it.

In their letter, Amis, Clark and Pittman say that the Finch campaign deficit needs to be cleared so it won't bother the governor as he "continues his efforts for the people."

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banking circles that the Finch deficit, which had been reported at \$136,582 in the official campaign filing, actually runs \$300,000 when all the loans made around the state are thrown in.

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Now, it is evident that the money

MISSISSIPPI

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Those who watch such things carefully could hardly comprehend how Finch spent more than \$420,000 reported as campaign expenses for the first primary, particularly since he never launched the media blitz that was expected.

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1325 K STREET N.W.
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FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20061

THIS IS THE BEGINNING OF MUR # 813

Date Filmed 4/25/79 Camera No. --- 2

Cameraman LPC

79040120106



FEDERAL ELECTION COMMISSION

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

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 813.



79040113567

LAW OFFICES
BINDER & MOORE
511 EAST PEARL STREET
P. O. BOX 25
JACKSON, MISSISSIPPI 39205

RECEIVED
FEDERAL ELECTION
COMMISSION

ALVIN M. BINDER
RUSSEL D. MOORE, III
WILLIAM B. KIRKSEY
BOBBY B. DeLAUGHTER

July 5, 1979

'79 JUL 9 PM 12:49

MILLARD M. BUSH (1968)
TELEPHONE
948-8800
AREA CODE 601

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

9029-0

Re: Governor Cliff Finch Campaign Committee
for the United States Senate
Howard D. Clark - Treasurer

Dear Mr. Oldaker:

You will recall that I have previously corresponded with you as attorney who advised the Campaign Committee from time to time regarding the FEC requirements in the Senate race above.

One David W. Mitchell of Cleveland, Mississippi, by envelope postmarked June 22, 1979, directed to Governor Cliff Finch, Governor's Mansion, Jackson, Mississippi 39202, advised in a handwritten note that an account called "Cliff Finch Campaign Fund" in the Bank of Cleveland was being closed and a check was attached forwarding Cliff Finch \$65.55, a copy of all of which is attached hereto.

The envelope and attachments apparently were circulated and were brought to my attention this past Tuesday, July 3, 1979, and I promptly called Mr. David W. Mitchell of Cleveland, Mississippi, and asked him what type bank account did he refer to and he indicated it was a Senate Campaign bank account. I informed him that I had called Dr. Clark, the treasurer, and he had no knowledge of such an account and that no one was authorized in Cleveland, Mississippi, to have such a campaign bank account and that he should immediately make disclosure to the FEC regarding what monies or transactions he handled. He indicated that the monies he handled were of no

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Mr. William C. Oldaker
July 5, 1979
Page Two

large amount and that Attorney Charles Jacobs of Cleveland, Mississippi, was familiar with the matter. I promptly called Attorney Jacobs and talked with him this morning and he had no recall of the particulars of this account but said that he would meet with Mr. Mitchell and see that the matter was properly reported.

Dr. Clark informed me that the Federal Bureau of Investigation had asked for all bank accounts pertaining to the Campaign and since this unknown bank account was not turned over nor was the Campaign Committee aware of it until several days ago, I am notifying the FEC by and through you, sending you all information that I have, and simultaneously I am notifying the Federal Bureau of Investigation locally so that whatever agent is handling the matter can be aware of these transactions, whatever they are.

I am turning the original of these documents over to the campaign treasurer advising the treasurer to continue an investigation and attempt to obtain all documents which Mr. Mitchell says he will turn over.

Respectfully submitted,


ALVIN M. BINDER

AMB:ncb

cc Dr. Howard D. Clark
Morton, Mississippi

Mr. John Kelly
Federal Bureau of Investigation
Unifirst Federal Building
Jackson, Mississippi 39201

Secretary of the Senate
119 "D" Street, N.E.
Washington, D. C. 20510

CC Re: Analysis

DAVID W. MITCHELL

P.O. BOX 899

CLEVELAND, MISS. 38732



ITS NAME INDICATES ITS CHARACTER

THE LINCOLN NATIONAL
LIFE INSURANCE COMPANY
FORT WAYNE, INDIANA 46801

Governor Cliff Finch
Governor's Mansion
Jackson, Miss. 39202

Personal

7 2 0 4 J U I 1 1 3 3 7 1



CLEVELAND, MISS.

6-21

1979 No.

Bank of Cleveland

85-258
842

PAY TO THE
ORDER OF

Cliff Finch

\$65 ⁵⁵/₁₀₀

Sixty five and 55/100

DOLLARS

FOR

Campaign Expense

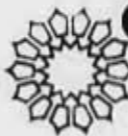
FDIC

Cliff Finch Campaign Fund

By David W. Mitchell

⑆0842⑈0258⑆

70040113371



The Sunburst Bank Member FDIC
Making your future brighter.

BANK OF CLEVELAND
CLEVELAND, MS
38732

CLIFF FINCH CAMPAIGN FUND
P O BOX 899
2 DAVID MITCHELL
CLEVELAND, MS 38732

035 DT

ACCOUNT NUMBER

05-435625

STATEMENT PERIOD

05/18 06/18/79

PLEASE USE YOUR ACCOUNT NUMBER ON ALL CHECKS AND DEPOSITS

BALANCE LAST STATEMENT	NO.	CHECKS PAID AMOUNT	NO.	DEPOSITS AMOUNT	SERVICE CHARGE	BALANCE THIS STATEMENT
65.55		.00		.00	1.00	65.55
DATE	CHECKS - DEBITS		CHECKS - DEBITS		DEPOSITS - CREDITS	BALANCE

Account Closed Letter
5-20-79
David W. Mitchell
all bank statements are in
my possession if you would
like to have them
D.M.

77710111337

LAW OFFICES
BINDER & MOORE

511 EAST PEARL STREET

P. O. BOX 25

JACKSON, MISSISSIPPI 39205

7 3 0 4 0 1 1 3 5 7
CERTIFIED

No.

574648

MAIL

Mr. William C. Oldaker

General Counsel

Federal Election Commission

1325 K Street, N. W.

Washington, D. C. 20463



FEDERAL ELECTION COMMISSION

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END OF ADDITIONAL MATERIAL FOR CLOSED MLR 813.

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