



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 530

DATE: 9/27/78

FILMED BY: YMB



FEDERAL ELECTION COMMISSION

Duplicates

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

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input type="checkbox"/> (5) Internal Documents | |

Signed

date

Christopher Y. Brown
Sept. 12, 1978

FEC 9-21-77

MUR 530

78040064694



FEDERAL ELECTION COMMISSION

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

September 11, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Nathan Landow
7220 Arrowood Road
Bethesda, Maryland 20034

RE: MUR 530

Dear Mr. Landow,

On August 28, 1978, the Commission approved the conciliation agreement which was signed by you on August 9, 1978. Accordingly I have signed the agreement on behalf of the Commission. The conciliation agreement in effect closes this matter. A copy of it is enclosed for your information.

Sincerely,

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

William C. Oldaker
General Counsel

Enclosure

Conciliation Agreement

7 8 0 4 0 0 6 4 6 9 5

RECEIVED
FEDERAL ELECTION
COMMISSIONBEFORE THE FEDERAL ELECTION COMMISSION
July 17, 1978

18 AUG 14 AM 9:39

In the Matter of)
)
Nathan Landow) MUR 530 (78)

CONCILIATION AGREEMENT

WHEREAS, pursuant to 2 U.S.C. §437g(a)(2) and (5), the Federal Election Commission (hereinafter "The Commission") has made findings of reason to believe and reasonable cause to believe that Nathan Landow (hereinafter "Respondent") violated 2 U.S.C. §441(a)(3) and 2 U.S.C. §441a(a)(1)(B);

The Commission and Respondent, pursuant to 2 U.S.C. §437g(a)(5)(A), do hereby resolve and conciliate the above-captioned matter under review by agreeing as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter under review pursuant to 2 U.S.C. §§437d(a)(10) and 437g.
- II. The pertinent facts are as follows:
 - A. Respondent's political contributions for calendar year 1977 amounted to \$25,420.
 - B. Respondent contributed \$20,170 in 1977 to the Democratic National Committee and its affiliates, The Democratic Finance Committee and the Association of State Democratic Chairpersons.

WHEREAS, Respondent agrees that:

- A. Respondent's contributions in 1977 of \$25,420 violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.

F05286

73040064695

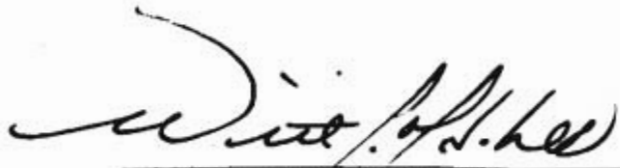
- 78040064697
- B. Respondent's contributions amounting to \$20,170 to the Democratic Finance Committee, the Democratic National Committee, and the Association of Democratic Chairpersons violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party.
 - C. Pursuant to 2 U.S.C. §437g(a)(6), Respondent agrees to pay \$100 as a civil penalty within thirty (30) days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matters involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).

B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and The Commission has approved the entire agreement.

9/8/78
Date


William C. Oldaker
General Counsel
Federal Election Commission

8/9/78
Date


Nathan Landow
Respondent

78040064693

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nathan Landow)

MUR 530 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 28, 1978, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Sign the conciliation agreement, attached to the General Counsel's memorandum dated August 24, 1978, which had been approved by the Commission on July 27, 1978 and signed by the respondent August 9, 1978.
2. Close the file in this matter.

Attest:

8/28/78
Date

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

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

78040064699

August 24, 1978

MEMORANDUM TO: Marge Emerson
FROM: Elissa T. Garry
SUBJECT: MUR 530

Please have the attached Memo and conciliation agreement in MUR 530 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040064700



FEDERAL ELECTION COMMISSION

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

August 24, 1978

MEMORANDUM

TO: THE COMMISSION

FROM: WILLIAM C. OLDAKER *W.C. Oldaker*

SUBJECT: MUR 530 Conciliation Agreement

The Reports Analysis Division referred this matter to the General Counsel's office. On April 13, 1978, the Commission found reason to believe that Nathan Landow violated Sections 441a(a)(3) and 441a(a)(1)(B) of the Act. It appeared that Mr. Landow exceeded both his aggregate \$25,000 annual contribution limitation for 1977 and his \$20,000 annual contribution limitation to political committees established and maintained by a national political party. The Commission also found reason to believe that the Democratic Finance Committee knowingly accepted excess contributions from Landow at the same time.

After further investigation it appeared that Mr. Landow did indeed exceed his contribution limitations, but that they were not knowingly accepted by the Democratic Finance Committee. Accordingly, on July 27, 1978 the Commission found reasonable cause to believe that Mr. Landow violated Sections 441a(a)(3) and 441a(a)(1)(B) of the Act and no reasonable cause to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f). The Commission also approved the attached conciliation agreement.

Since then Mr. Landow has signed the conciliation agreement and returned it to the Commission with a check for \$100.00, the amount of the civil penalty. We received this communication on August 14, 1978. Mr. Landow has been fully cooperative in our efforts to settle this matter.

The Office of General Counsel therefore recommends that the attached conciliation agreement which had been approved by the Commission on July 27, 1978 be signed and that this matter be closed.

78040764701

TOW

100-44491

RECEIVED
FEDERAL ELECTION
COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION
July 17, 1978

AUG 14 AM 9:33

In the Matter of)
) MUR 530 (78)
Nathan Landow)

CONCILIATION AGREEMENT

WHEREAS, pursuant to 2 U.S.C. §437g(a)(2) and (5), the Federal Election Commission (hereinafter "The Commission") has made findings of reason to believe and reasonable cause to believe that Nathan Landow (hereinafter "Respondent") violated 2 U.S.C. §441(a)(3) and 2 U.S.C. §441a(a)(1)(B);

The Commission and Respondent, pursuant to 2 U.S.C. §437g(a)(5)(A), do hereby resolve and conciliate the above-captioned matter under review by agreeing as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter under review pursuant to 2 U.S.C. §§437d(a)(10) and 437g.
- II. The pertinent facts are as follows:
 - A. Respondent's political contributions for calendar year 1977 amounted to \$25,420.
 - B. Respondent contributed \$20,170 in 1977 to the Democratic National Committee and its affiliates, The Democratic Finance Committee and the Association of State Democratic Chairpersons.

WHEREAS, Respondent agrees that:

- A. Respondent's contributions in 1977 of \$25,420 violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.

73040064702

F05286

- B. Respondent's contributions amounting to \$20,170 to the Democratic Finance Committee, the Democratic National Committee, and the Association of Democratic Chairpersons violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party.
- C. Pursuant to 2 U.S.C. §437g(a)(6), Respondent agrees to pay \$100 as a civil penalty within thirty (30) days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matters involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).

73040064703

B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and The Commission has approved the entire agreement.

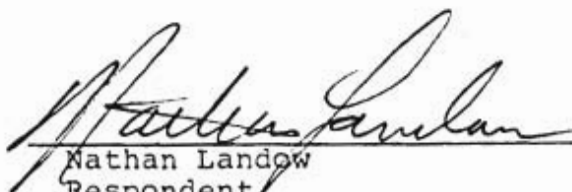
73040064704

Date

8/9/78

Date

William C. Oldaker
General Counsel
Federal Election Commission



Nathan Landow
Respondent

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT	
DATE	AMOUNT
	100.00
TOTAL OF INVOICES	
LESS DISCOUNT	
LESS FREIGHT	
LESS	
TOTAL DEDUCTIONS	
AMOUNT OF CHECK	

LANDOW & CO.
BUILDERS - PROPERTY MANAGEMENT
4710 BETHESDA AVENUE
BETHESDA, MARYLAND 20014

8995

August 11 1978 15-3 540

PAY TO THE ORDER OF

Treasury of the United States \$100.00

THE SUM 100 DOLLARS DOLLARS

The RIGGS NATIONAL BANK
of WASHINGTON D.C.
FRIENDSHIP OFFICE
WISCONSIN AVE. & WARREN ST., N. W.

LANDOW & CO.

Robert Landow

⑈00008995⑈ ⑆0540⑈0003⑆ 07⑈08047583⑈

7 8 0 4 0 0 6 4 7
[REDACTED] LANDOW & Co. BUILDERS

BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

FEDERAL ELECTION
COMMISSION



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

Attn: Mr. William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

August 2, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. D. Nelson, Treasurer
Democratic Finance Committee
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

RE: MUR 530 (78)

Dear Mr. Nelson:

The Commission has determined after an investigation to close this matter as to the acceptance of excess contributions by your committee and its affiliate, the Democratic National Committee, from Mr. Nathan Landow in violation of 2 U.S.C. §441a(f). A copy of the Commissioner's certification is enclosed for your information.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "William C. Oldaker", is written over a circular stamp.

William C. Oldaker
General Counsel

Enclosure

MUR 530 - TOW

PS Form 3811, Apr. 1977

● **SENDER:** Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one).
☐ Show to whom and date delivered. _____
☒ Show to whom, date, and address of delivery. _____
☐ RESTRICTED DELIVERY
 Show to whom and date delivered. _____
☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$ _____
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
 J.D. Nelson, Treas.
 Wamp. Fin. Corp.
 1625 Main St. S.E. 20036

3. ARTICLE DESCRIPTION:
 REGISTERED NO. 943953 CERTIFIED NO. 1 INSURED NO. _____
 (Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 8/4/78 POSTMARK _____

5. ADDRESS (Complete only if requested)
4th fl

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

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL.



FEDERAL ELECTION COMMISSION

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

August 2, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Nathan Landow
7220 Arrowood Road
Bethesda, Maryland 20034

RE: MUR 530

Dear Mr. Landow:

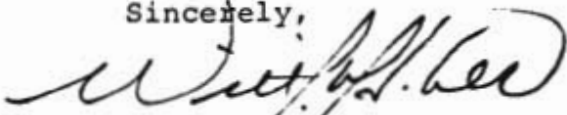
On July 27, 1978, the Commission determined there was reasonable cause to believe that you committed a violation of 2 U.S.C. §§441a(a)(3) and 441a(a)(1)(B) of the Federal Election Campaign Act of 1971, as amended. The Commission found reasonable cause to believe that you violated Section 441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977. Also the Commission found reasonable cause to believe that you violated Section 441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party in 1977. These political committees were the Democratic National Committee, the Democratic Finance Committee, and The Association of State Democratic Chairpersons.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5000.00.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the amount of the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

Sincerely,



William C. Oldaker
General Counsel

Enclosure

Mark 530 - Tow

PS Form 3811, Apr. 1977

● **SENDER:** Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):

☐ Show to whom and date delivered.....¢

☒ Show to whom, date, and address of delivery.....¢

☐ RESTRICTED DELIVERY

Show to whom and date delivered.....¢

☐ RESTRICTED DELIVERY.

Show to whom, date, and address of delivery. \$.....

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Nathan Landau
7220 Arrowood
Bethesda, Md. 20834

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>943952</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Addressee ☐ Authorized agent

N. Landau

4. DATE OF DELIVERY

8-4-78

5. ADDRESS (Complete only if requested)

7220 Arrowood Rd.

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

DMK

DC WEST BEHNSG
POST OFFICE
7
1978
USPO

☆ GPO : 1977-O-234-337

802253

LANDOW & Co. BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

April 26, 1978

MUR 530

Attachment I

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

Attention: Mr. Conley Edwards

Dear Mr. Edwards:

In response to your letter of April 18, 1978,
attached herewith is a list of the Political
Contributions which Mr. Landow made during 1977.

Sincerely,
Millie Linn
Millie Linn

ML:gt
cc: Mr. Cecil Cheeves
Democratic National Committee

73040064711

LANDOW & Co. BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

POLITICAL CONTRIBUTIONS

1977

1-12-77	Association of States - Demo, Ch,	\$100.00	
1-12-77	Corcoran Reception D.N.C.	70.00	
1-14-77	David Cornwall for Congress	100.00	8 th Inc
1-14-77	Ken Holland for Congress	100.00	6 th S.C
2-14-77	Norman Rabineau (Blair Lee)	1,000.00	X
2-16-77	National Finance Committee	5,000.00	
4-1-77	Demo, Congr. Dinner Committee	5,000.00	
4-18-73	Jeanerette for Congress	1,000.00	6 th S.C
5-2-77	M. Michael Cræmer/Larry Levitan	500.00	X
6-3-77	Demo, Nat'l. Comm.	10,000.00	
6-13-77	Davis for Congress	500.00	12 th S.C
7-18-77	Citizens for Davis	200.00	8 th Md.
8-10-77	The Venetoulis Political Committee	1,000.00	X
9-23-77	Demo. House & Senate Council	125.00	
10-5-77	Moakley for Congress	200.00	9 th Mas
11-4-77	Demo. House & Senate Council	125.00	
12-6-77	Demo. Nat'l. Committee	5,000.00	
		<u>\$30,020.00</u>	

73040064712

23040064713

1. *Journal of the American Statistical Association*, 1970, 65(321), 1-11.

73040064714

In the Matter of)
) MUR 530 (78)
Nathan Landow)

CONCILIATION AGREEMENT

WHEREAS, pursuant to 2 U.S.C. §437g(a)(2) and (5), the Federal Election Commission (hereinafter "The Commission") has made findings of reason to believe and reasonable cause to believe that Nathan Landow (hereinafter "Respondent") violated 2 U.S.C. §441(a)(3) and 2 U.S.C. §441a(a)(1)(B);

The Commission and Respondent, pursuant to 2 U.S.C. §437g (a) (5) (A), do hereby resolve and conciliate the above-captioned matter under review by agreeing as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter under review pursuant to 2 U.S.C. §§437d(a)(10) and 437g.
- II. The pertinent facts are as follows:
- A. Respondent's political contributions for calendar year 1977 amounted to \$25,420.
- B. Respondent contributed \$20,170 in 1977 to the Democratic National Committee and its affiliates, The Democratic Finance Committee and the Association of State Democratic Chairpersons.

WHEREAS, Respondent agrees that:

- A. Respondent's contributions in 1977 of \$25,420 violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.

- B. Respondent's contributions amounting to \$20,170 to the Democratic Finance Committee, the Democratic National Committee, and the Association of Democratic Chairpersons violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party.
- C. Pursuant to 2 U.S.C. §437g(a)(6), Respondent agrees to pay \$100 as a civil penalty within thirty (30) days of the effective date of this agreement. Payment shall be made to the Treasury of the United States.

IV. General Conditions

- A. The Commission, at the request of anyone filing a complaint under 2 U.S.C. §437g(a)(1) concerning matters involved herein, or on its own initiative, may review compliance with this agreement. If the Commission determines that this agreement has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia pursuant to §437g(a)(7).

73040064715

B. It is mutually agreed that this conciliation agreement shall become effective on the date that all parties hereto have executed the same and The Commission has approved the entire agreement.

Date

William C. Oldaker
General Counsel
Federal Election Commission

Date

Nathan Landow
Respondent

7 3 0 4 0 0 6 4 7 1 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nathan Landow)
Democratic National Committee)
Democratic Finance Committee)

MUR 530 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 27, 1978, the Commission determined by a vote of 5-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(3).
2. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(1)(B).
3. Find no reasonable cause to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f).
4. Approve the conciliation agreement with Mr. Nathan Landow as set forth in the attachment to the General Counsel's Report signed July 21, 1978.
5. Send the letters attached to the General Counsel's Report signed July 21, 1978.

Commissioner Springer was not present at the time of the vote.

Attest:

7/31/78

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

73040064717

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Nathan Landow) MUR 530 (78)
Democratic National Committee)
Democratic Finance Committee)

GENERAL COUNSEL'S REPORT

BACKGROUND

On April 13, 1978, the Commission found reason to believe that Nathan Landow violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977; that Nathan Landow violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party; and that the Democratic Finance Committee violated 2 U.S.C. §441a(f) by knowingly accepting excess contributions from Mr. Landow.

On June 23, 1978, an Interim Report was distributed to the Commission on a 24 hour no objection basis. It was reported that it appeared that Nathan Landow did not exceed the \$20,000 contribution limitation imposed by 2 U.S.C. §441a(a)(1)(B) and that the Democratic Finance Committee (the DFC), an affiliate of the Democratic National Committee (the DNC), did not violate 2 U.S.C. §441a(f) by knowingly accepting excess contributions since there were none. It was also reported that apparently Nathan Landow violated 2 U.S.C. §441a(a)(3) by exceeding his annual \$25,000 contribution limitation in 1977 in the amount of \$2,520.

73040064718

ANALYSIS

Concerning Landow exceeding his \$25,000 annual contribution limit for 1977, it appears that although he did indeed exceed this contribution limit, it was by an amount less than previously thought. Section 441a(a)(3) of the Act sets forth the \$25,000 yearly contribution limitation for individuals. It also states that contributions made to a candidate in a year other than the calendar year in which the election is held with respect to which such contribution is made, are considered to be made during the calendar year in which such election is held.

As reported earlier, a letter listing Nathan Landow's political contributions for 1977 was received by the Commission on April 26, 1978 (see Attachment I). Included in the letter were contributions made in 1977 to the principal campaign committees of candidates for the United States House of Representatives. The total of these contributions amounted to \$2100.00. It appears that these funds would not apply to Landow's contribution limit for 1977 in light of Section 441a(a)(3) of the Act. Therefore, while it was previously thought that Landow exceeded his \$25,000 annual limitation by \$2,520 in 1977, it now appears that he exceeded his yearly contribution limit by only \$420 (\$2520 minus \$2100).

7 3 0 4 0 0 6 4 7 2 0

As for Landow exceeding the \$20,000 limit on contributions which he could make to the DFC, the DNC, and their affiliates, it appears that he did so in the amount of \$170.00. It was reported earlier that Landow contributed exactly \$20,000 to the DNC and its affiliates for 1977, thereby falling within the Act's contribution limitation. From the April 26, 1978 letter however, two contributions dated January 12, 1977 are listed as being made to affiliates of the DNC. They are \$70.00 to the "Corcoran Reception D.N.C." and \$100.00 to "Association of States - Demo. Ch." (Attachment I). Landow and the DNC informed the Commission in two letters dated June 26, 1978 and June 23, 1978 of a \$70.00 refund by the DNC to Landow for the Corcoran contribution. As for his \$100.00 contribution to the "Association of States - Dem. Ch.", Landow's bookkeeper, Ms. Millie Linn, confirmed in a July 13, 1978 telephone conversation that there was a check made out on that date to that party. The Association of State Democratic Chairpersons is a DNC affiliate (see Attachment II). Therefore, it appears that Landow did exceed his \$20,000 contribution limit for 1977 to the DNC and its affiliates in the amount of \$170.00.

Concerning a possible violation of 2 U.S.C. §441a(f) by the DNC and the DFC for knowingly accepting excess contributions, they claim they had no knowlege of this. A telephone conversation with Pat Whiteaker, controller at DNC headquarters on July 12, 1978, indicates that the contributions were not knowingly accepted. She stated that computer backups and other complications prevented their committees from detecting excess contributions.

RECOMMENDATIONS

1. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(3).
2. Find reasonable cause to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(1)(B).
3. Find no reasonable cause to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f).
4. Approve the attached conciliation agreement with Mr. Nathan Landow.
5. Send the attached letters.

7/21/78
Date


William C. Oldaker
General Counsel

78040064721



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. J. D. Nelson, Treasurer
Democratic Finance Committee
1625 Massachusetts Avenue, N.W.
Washington, D.C. 20036

RE: MUR 530 (78)

Dear Mr. Nelson:

The Commission has determined after an investigation to close this matter as to the acceptance of excess contributions by your committee and its affiliate, the Democratic National Committee, from Mr. Nathan Landow in violation of 2 U.S.C. §441a(f). A copy of the Commissioner's certification is enclosed for your information.

Sincerely yours,

William C. Oldaker
General Counsel

Enclosure

73040064722



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Nathan Landow
7220 Arrowood Road
Bethesda, Maryland 20034

RE: MUR 530

Dear Mr. Landow:

On , 1978, the Commission determined there was reasonable cause to believe that you committed a violation of 2 U.S.C. §§441a(a)(3) and 441a(a)(1)(B) of the Federal Election Campaign Act of 1971, as amended. The Commission found reasonable cause to believe that you violated Section 441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977. Also the Commission found reasonable cause to believe that you violated Section 441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party in 1977. These political committees were the Democratic National Committee, the Democratic Finance Committee, and The Association of State Democratic Chairpersons.

The Commission has a duty to attempt to correct such violations for a period of 30 days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may, upon a finding of probable cause to believe a violation has occurred, institute civil suit in United States District Court and seek payment of a civil penalty not in excess of \$5000.00.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed conciliation agreement, please sign and return it along with the amount of the civil penalty to the Commission within ten days. I will then recommend that the Commission approve the agreement.

-2-

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Christopher Tow, the attorney assigned to this matter at (202) 523-4073.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7 9 0 4 0 0 6 4 7 2 4

G.C.C.# 3951

LANDOW & Co. BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

18 JUN 28 PM 12:02

June 26, 1978

Mr. Chris Tow, Atty.
Federal Election Commission
1325 K Street N.W.
Washington, D. C. 20463

PO4028

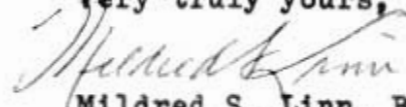
Dear Sir:

Re: MUR 530
Letter April 18, 1978

In response to your recent telephone call re the above matter, we contacted the Democratic National Committee and have received a refund from them per the copy of letter enclosed and check stub.

Please let me know if further action is necessary.

Very truly yours,



Mildred S. Linn, Bkkpr.
for Nathan Landow

MSL:me
Encl.

73040064725

DEMOCRATIC
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-5900

June 22, 1978

Mr. Nathan Landow
7220 Arrowood Road
Bethesda, Md. 20034

Dear Mr. Landow:

It has come to our attention that you may have exceeded your 1977 annual contribution limitation to the Democratic National Committee and its affiliates by \$70.00. Consequently, we are enclosing a refund check to you for the same amount and have advised the Federal Election Commission of our action.

Sincerely,

Patricia Whiteaker

Patricia Whiteaker
Controller

DEMOCRATIC NATIONAL COMMITTEE
WASHINGTON, D.C. 20036

DETACH AND RETAIN THIS STATEMENT
FOR ATTACHMENT TO YOUR 1978 PAYMENT AND AS AN ENCLOSURE BELOW
IF YOU REQUEST A REFUND TO THE NATIONAL COMMITTEE AND REQUEST REFUND

DELUXE - FORM WVC-3 V-7

6/23/78
Contribution Refund

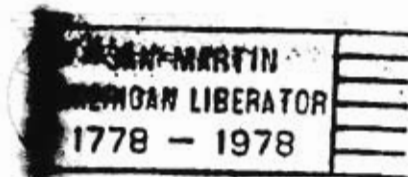
70.⁰⁰

7 8 0 4 0 0 6 4 7 2 6

7
3
0
4
0
0
6
4
7
7

LANDOW & Co. BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600



Mr. Chris Tow, Atty.
Federal Election Commission
1325 K Street NW
Washington, D. C. 20463

JUN 28 PM 12:02



FEDERAL ELECTION COMMISSION

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

June 26, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

mwe

SUBJECT: MUR 530 (78) - Interim Report dated 6-22-78
Received in Office of Commission
Secretary: 6-23-78, 11:29

The above-mentioned document was circulated on a 24
hour no-objection basis at 4:00 p.m., June 23, 1978.

There were no objections to the Interim Report.

78040064728

June 23, 1978

MEMORANDUM TO: Marge Emons
FROM: Elissa T. Garr
SUBJECT: MUR 530

Please have the attached Interim Report on
MUR 530 distributed to the Commission on a 24 hour
no-objection basis.

Thank you.

78040064729

BEFORE THE FEDERAL ELECTION COMMISSION
June 22, 1978

In the Matter of)
)
Nathan Landow) MUR 530 (78)
Democratic National Committee)
Democratic Finance Committee)

INTERIM REPORT

BACKGROUND

MUR 530 is an internally generated matter which was referred to the Office of General Counsel on January 31, 1978 by the Reports Analysis Division. The parties involved are Nathan Landow, The Democratic National Committee and its affiliate, The Democratic Finance Committee. On April 17, 1978, the Commission found reason to believe that Nathan Landow violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party, that the Democratic Finance Committee violated 2 U.S.C. §441a(f) by knowingly accepting these excess contributions from Mr. Landow, and that Landow violated 2 U.S.C. §441a(a)(3) by exceeding his annual \$25,000 contribution limitation in 1977.

ANALYSIS

The controller of The Democratic National Committee (hereinafter the DNC) mailed a clarification letter which was received at the Commission on May 10, 1978. Enclosed with the letter was

79040064730

7 8 0 4 0 0 6 4 7 3 1

a corrected listing of Landow's contribution profile for 1977 to the DNC and to its affiliate, the Democratic Finance Committee (hereinafter the DFC). The aggregate total of his contributions to these affiliated committees including any loan guarantees amounted to exactly \$20,000. The listing included the reported release of Landow's guarantee on a loan to the DNC which was not originally computed into The First General Counsel's Report. The amount reportedly released was \$4,750.00. Landow was initially thought to have contributed \$4,750.00 over his 20,000 contribution limitation to the DNC and the DFC.

A review of reports filed by the DNC with the Commission confirms the information in the above mentioned clarification letter. A DNC 30 day report following a special election on February 22, 1977 reveals that Landow did guarantee a loan to the DNC from the National Bank of Washington. As the loan was being paid off, the original amount which Landow guaranteed diminished or was "released". The DNC's July 10, 1977 quarterly report reveals that all but \$4,750.00 remained unreleased on his loan guarantee. The DNC's August 27, 1977 special 10 day pre-election report shows that this loan was totally paid off with interest on July 14, 1977 and that all guarantees for this loan were released.

It appears therefore, that Landow did not exceed his \$20,000 contribution limitation to political committees established and maintained by a national political in violation of 2 U.S.C. §441a(a)(1)(B). It also appears that the Democratic Finance Committee did not violate 2 U.S.C. §441a(f) by knowingly accepting excess contributions since there were none.

As for Nathan Landow exceeding his individual \$25,000 contribution limitation in 1977, it appears that he did indeed violate Section 441a(a)(3) of the Act. On April 26, 1978, the Commission received a letter from Landow's accountant, Ms. Millie Linn. Enclosed was a list of political contributions which Landow made during 1977. The list did not include the previously mentioned loan release in the amount of \$4750.00. It did include however, additional contributions to Federal candidates and committees which did not appear on the computer G-index for Landow used in The First General Counsel's report. These additional contributions amount to \$1,570.00. An updated computation of Landow's 1977 contributions is as follows:

\$30,700	original amount thought to have been contributed by Landow in 1977
<u>- 4,750</u>	amount of loan release not previously computed
\$25,950	
<u>+ 1,570</u>	additional contributions to Federal candidates and committees revealed in Landow's letter.
\$27,520	

It therefore appears that Landow contributed \$27,520 in 1977 to Federal candidates and committees or \$2,520 over his \$25,000 contribution limit.

78040064732

A June 14, 1978 telephone conversation with Ms. Millie Linn reveals that she has forwarded our correspondence with Landow to a Mr. Mike Greely, an attorney at the DNC. Further conversations with Ms. Linn and Mr. Landow are forthcoming. The Office of General Counsel will be prepared to recommend reasonable cause to believe that Landow violated 2 U.S.C. §441a(a)(3) and draft a conciliation agreement pending the outcome of these conversations.

Date

6/22/78

William C. Oldaker
General Counsel

78040064733

DEMOCRATIC
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-5900

RECEIVED
FEDERAL ELECTION
COMMISSION

PCC
3901

'78 JUN 23 AM 11:37

June 22, 1978

803897

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
Attn: Charles N. Steele

Re: Mr. Nathan Landow
7220 Arrowood Road
Bethesda, Md. 20034

Dear Commissioners:

It has come to our attention that the above mentioned individual, Mr. Nathan Landow, may have exceeded his 1977 annual contribution limitation to the Democratic National Committee and its affiliates. After review of our records we have noted the following contribution history:

<u>Date Received</u>	<u>Reporting Committee</u>	<u>Amount</u>
1-21-77	Democratic National Committee	70.00
4-8-77	Democratic Finance Committee	5000.00
6-16-77	Democratic Finance Committee	10000.00
12-7-77	Democratic Finance Committee	5000.00
	Total	20070.00

In light of this, we have refunded today to Mr. Landow \$70.00 which will be reflected in our June 30 disclosure report. If you have any questions, please call me.

Sincerely,

Patricia Whiteaker
Controller

7 9 0 4 0 0 6 4 7 3 4

DEMOCRATIC
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W.
Washington, D.C. 20036

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

Attention: Charles N. Steele



JUN 23 AM 11:37

FEDERAL ELECTION COMMISSION

DEMOCRATIC
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-5900

REC-102625
FEDERAL ELECTION
COMMISSION

LCC
3509

'78 MAY 10 PM 12:36

May 8, 1978

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

Re: MUR 530
Democratic Finance Committee

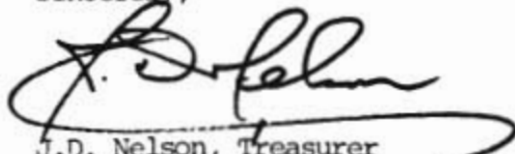
Dear Commissioners:

I am in receipt of your letter requesting clarification regarding a possible violation in respect to contributions reported in 1977 which appear to exceed the annual maximum limitations per donor for national parties.

It is apparent that the information upon which you have based this determination is incomplete. Attached is a corrected listing reflecting Mr. Landow's contribution profile.

Since this is the second request by the Commission regarding the same circumstances, it is advisable for your staff to review all cancelled guarantee amounts as other contributors' annual contribution aggregates may very well be overstated.

Sincerely,



J.D. Nelson, Treasurer
Democratic Finance Committee

7 9 0 4 0 0 6 4 7 3 5

Nathan Landow

<u>Date</u>	<u>Amount</u>	<u>Committee</u>	<u>Aggregate</u>
1-27-77	\$20,000 (Loan Endorsement)	Democratic National Committee	\$20,000
3-4-77	-5,000.00 (Endorsement Released)	Democratic National Committee	\$15,000
3-31-77	-250.00 (Endorsement Released)	Democratic National Committee	\$14,750
4-8-77	\$5,000	Democratic Finance Committee	\$19,750
6-16-77	\$10,000	Democratic Finance Committee	\$29,750
6-21-77	-\$10,000 (Endorsement Released)	Democratic National Committee	\$19,750
7-14-77	-\$4,750*	Democratic National Committee	\$15,000
12-7-77	\$5,000	Democratic Finance Committee	\$20,000 Total Aggregate

*Endorsement released; loan paid in full. See attached documentation.

7 8 0 4 0 0 6 4 7 3 7

Schedule B

July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Itemized Expenditures
Campaign Fundraising, Loans, and Transfers
for Lines 20, 22, 23, and/or 24 of FEC Form 3

(see instructions on back)

Page 1 of 1 forLINE NUMBER 22

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

Name of Candidate or Committee in full

DEMOCRATIC NATIONAL COMMITTEE

10 day pre primary

Full Name, mailing address and ZIP code

National Bank of Washington
14th and G Streets, N.W.
Washington, D.C.

Purpose of Expenditure

Loan repay & Interest

Date (month, day, year)

7-14-77

Amount of each expenditure this period

81,437.92

*

Full Name, mailing address and ZIP code

Boatmens National Bank of St. Louis
Box 236
St. Louis, Mo.

Purpose of Expenditure

Loan Repay & Interest

Date (month, day, year)

7-12-77

Amount of each expenditure this period

30,510.21

Full Name, mailing address and ZIP code

Committee for TAPE
P.O. Box 32287
San Antonio, TX 78284

Purpose of Expenditure

Contribution Refund
(Over limit)

Date (month, day, year)

8-22-77

Amount of each expenditure this period

140.00

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Full Name, mailing address and ZIP code

Purpose of Expenditure

Date (month, day, year)

Amount of each expenditure this period

Subtotal of expenditures this page (continued)

July 1976
Federal Election Commission
1111 Constitution Avenue, N.W.
Washington, D.C. 20463

(see instructions on back)

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

10 day pass - Roumans

A loan secured from the National Bank of Washington, Washington D.C., and from Boatmens National Bank of St. Louis, Box 236, St. Louis Missouri have been paid in full as reported on line 22 of this report.

Amount of each receipt this period

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ► \$

All guarantees for this loan as previously disclosed have been released.

Amount of each receipt this period

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ S

Amount of each receipt this period

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date S

Amount of each receipt this period

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ S

Amount of each receipt this period

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ S

Amount of each receipt this period

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-to-date ▶ S

Subtotal of receipts this page (optional) ▶ \$

DEMOCRATIC
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W.
Washington, D.C. 20036

7 8 0 4 0 0 6 4 7 0

RECEIVED
FEDERAL ELECTION
COMMISSION



Federal Election Commission

1325 K Street, N.W.
Washington, D.C. 20463

MAY 10 PM 12:36

DEMOCRATIC
NATIONAL COMMITTEE

1625 Massachusetts Ave., N.W. Washington, D.C. 20036 (202) 797-5900

RECEIVED
FEDERAL ELECTION

78 MAY 1 P 4: 43

802330

April 27, 1978

Mr. Conley Edwards, Jr.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 530

Dear Mr. Edwards:

We are in receipt of your notification number MUR 530
and will submit a detailed response upon receipt of
more specific information from your office.

Sincerely,

Pat Whiteaker

Patricia Whiteaker

7301005474

DEMOCRATIC
NATIONAL COMMITTEE
1625 Massachusetts Ave., N.W.
Washington, D.C. 20036



Mr. Conley Edwards, Jr.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

18 MAY 1 4:43 PM

RECEIVED
FEDERAL ELECTION
COMMISSION

Handwritten: YC 3389
802253

LANDOW & Co. BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

April 26, 1978

MUR 530

7 3 0 4 0 0 6 4 7 4 3

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

Attention: Mr. Conley Edwards

Dear Mr. Edwards:

In response to your letter of April 18, 1978,
attached herewith is a list of the Political
Contributions which Mr. Landow made during 1977.

Sincerely,

Handwritten signature: Millie Linn
Millie Linn

ML:gt

cc: Mr. Cecil Cheeves
Democratic National Committee

LANDOW & Co. BUILDERS

4710 BETHESDA AVENUE, BETHESDA, MARYLAND 20014 • 301/657-4600

POLITICAL CONTRIBUTIONS

1977

1-12-77	Association of States - Demo. Ch,	\$100.00	
1-12-77	Corcoran Reception D.N.C.	70.00	
1-14-77	David Cornwall for Congress	100.00	8 th Ind
1-14-77	Ken Holland for Congress	100.00	5 th S.C.
2-14-77	Norman Rabineau (Blair Lee)	1,000.00	
2-16-77	National Finance Committee	5,000.00	
4-1-77	Demo. Congr. Dinner Committee	5,000.00	
4-18-73	Jeanerette for Congress	1,000.00	6 th S.C.
5-2-77	M. Michael Cræmer/Larry Levitan	500.00	
6-3-77	Demo. Nat'l. Comm.	10,000.00	
6-13-77	Davis for Congress	500.00	
7-18-77	Citizens for Davis	200.00	
8-10-77	The Venetoulis Political Committee	1,000.00	
9-23-77	Demo. House & Senate Council	125.00	
10-5-77	Moakley for Congress	200.00	9 th Mass
11-4-77	Demo. House & Senate Council	125.00	
12-6-77	Demo. Nat'l. Committee	5,000.00	
		<u>\$30,020.00</u>	

73040064744



FEDERAL ELECTION COMMISSION

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

April 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Nathan Landow
7220 Arrowood Road
Bethesda, Maryland 20034

Re: MUR 530

Dear Mr. Landow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").

Specifically, it appears that you violated 2 U.S.C. §441a(a)(3) by exceeding the annual \$25,000.00 contribution limitation for an individual. Also, reports filed with the Commission show that you contributed in excess of \$20,000.00 in 1977 to political committees established by a national political party (the Democratic National Committee and the Democratic Finance Committee) in violation of 2 U.S.C. §441a(a)(1)(B). We have numbered this matter MUR 530.

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

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 Conley Edwards, Jr., the staff member assigned to this matter, at



78040064745

202-523-4143.

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

Charles N. Steele
Charles N. Steele
Associate General Counsel

530 Canadian

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:
Nathan Landow

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
443694

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
4-19-78

5. ADDRESS (Complete only if requested)
*7220 Arrowood Rd
Bethesda, MD 20834*

6. UNABLE TO DELIVER BECAUSE:
INITIALS

APR 19 1978
U.S. POSTMAN
BETHESDA, MD

☆ GPO : 1977-O-234-337



FEDERAL ELECTION COMMISSION

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

April 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J.D. Nelson, Treasurer
Democratic Finance Committee
1625 Massachusetts Ave., N.W.
Washington, D.C. 20036

Re: MUR 530

Dear Mr. Nelson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Democratic Finance Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your committee and your affiliate, the Democratic National Committee, accepted contributions in excess of the \$20,000.00 limitation of 2 U.S.C. §441a(a) (1) (B) from Mr. Nathan Landow in violation of 2 U.S.C. §441a(f). We have numbered this matter MUR 530.

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

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 Conley Edwards, Jr., staff member assigned to this matter, at 202-523-4143.



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

Charles N. Steele
Charles N. Steele
Associate General Counsel

Laurens 63D

PS Form 3811, Apr. 1977

● SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):
☐ Show to whom and date delivered
☒ Show to whom, date, and address of delivery
☐ RESTRICTED DELIVERY
Show to whom and date delivered
☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$
(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
*J. D. Nelson, Treas
Dem Finance Comm*

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
443,707

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY *APR 19 1979* POSTMARK *61 APR*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
KMS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Nathan Landow)

Democratic National Committee)

Democratic Finance Committee)

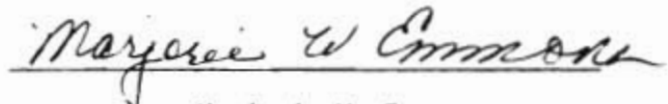
MUR 530 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 13, 1978, at an Executive Session of the Federal Election Commission at which a quorum was present, the Commission determined by a vote of 4-1 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find reason to believe that Mr. Nathan Landow violated 2 U. S. C. Section 441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.
2. Find reason to believe that Mr. Nathan Landow violated 2 U.S.C. Section 441a(a)(1)(B) by exceeding the \$20,000 annual contribution limitation to political committees established and maintained by a national political party.
3. Find reason to believe that the Democratic Finance Committee violated 2 U.S.C. Section 441a(f) by accepting excess contributions from Mr. Nathan Landow.
4. Send the draft letters attached to the General Counsel's Report.

Voting for this determination were Commissioners Aikens, Harris, Springer, and Staebler. Commissioner Tiernan cast a dissenting vote. Commissioner Thomson was not present at the time of the vote.



Date: April 17, 1978

Marjorie W. Emmons
Secretary to the Commission

General Counsel's Report dated March 30, 1978
Received in Office of Commission Secretary and circulated March 30, 1978
Objection filed March 31
Placed on meeting agenda for April 6, 1978, and tabled that date.
Placed on meeting agenda for April 13, 1978 and acted upon as noted above.

73040764749

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Nathan Landow)
Democratic National Committee)
Democratic Finance Committee)

MUR 530 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 13, 1978, at an Executive Session of the Federal Election Commission at which a quorum was present, the Commission failed to pass the following motion in the above-captioned matter:

MOVED:

That MUR 530 (78) be returned to the Office of the General Counsel with the direction that it be referred to the Reports Analysis Division for handling under present procedures for analyzing surface violations, taking into consideration the procedures in effect at the time of the alleged violation.
The vote was:

YEA (2) Commissioners Tiernan and Staebler

NAY (3) Commissioners Aikens, Harris, and Springer.

Commissioner Thomson was not present at the time of the vote.

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Date: April 17, 1978

79040064750



FEDERAL ELECTION COMMISSION

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

March 31, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
SUBJECT: OBJECTIONS

The following MURs circulated on a 24 hour no-objection basis have received objections from Commissioner Tiernan:

MUR 525 (78) - 1st GC Report dated 3-30-78
MUR 527 (78) - 1st GC Report dated 3-30-78
MUR 530 (78) - 1st GC Report dated 3-30-78
MUR 536 (78) - 1st GC Report dated 3-30-78
MUR 541 (78) - 1st GC Report dated 3-30-78 re-circulated 3-31-78
MUR 551 (78) - 1st GC Report dated 3-30-78

These items have been placed on the Executive Session Agenda for April 6, 1978

March 30, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 530

Please have the attached 7 day report on MUR 530 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

78040064752

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL MAR 30 1978
BY OGC TO THE COMMISSION

MUR NO. 530
DATE COMPLAINT RECEIVED
BY OGC
STAFF
MEMBER C. Edwards

SOURCE OF MUR: Referred from Reports Analysis (Attachment I)

RESPONDENTS' NAMES: Nathan Landow
Democratic National Committee
Democratic Finance Committee

RELEVANT STATUTE: 2 U.S.C. §441a(a)(3)
2 U.S.C. §441a(a)(1)(B)
2 U.S.C. §441a(f)

INTERNAL REPORTS CHECKED: Democratic National Committee, Democratic Finance
Committee, G. Index. (23 February 1978)

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Reports Analysis referred this matter to the Office of General Counsel after review of the reports of the Democratic Finance Committee and the Democratic National Committee showed that Mr. Nathan Landow may have exceeded the \$20,000.00 annual contribution limitation of 2 U.S.C. §441a(a)(1)(B). Also, the G. Index shows that Mr. Landow may have exceeded the \$25,000 annual contribution limitation of 2 U.S.C. §441a(a)(3). (Attachment II).

It also appears that the Democratic Finance Committee and the Democratic National Committee (which are affiliated committees) (Attachment III & IV) may have accepted excess contributions from Landow in violation of 2 U.S.C. §441a(f).

PRELIMINARY LEGAL ANALYSIS

The G. Index and the reports of the Democratic Finance Committee and the Democratic National Committee disclosed the following contributions from Mr. Landow for the 1977 calendar year.

1977 AGGREGATE CONTRIBUTIONS MADE BY NATHAN LANDOW

<u>Date of Contribution</u>	<u>Committee</u>	<u>Amount of Contrib. or Refund *</u>	<u>Balance</u>
1-27-77	Democratic National Committee	\$ 20,000	\$ 20,000
3-4-77	Democratic National Committee	(5,000)	15,000
3-31-77	Democratic National Committee	(250)	14,750
4-8-77	Democratic Finance Committee	5,000	19,750
4-12-77	Democratic Congressional Dinner Committee	5,000	24,750
6-13-77	Davis for Congress Committee	500	25,250
6-16-77	Democratic Finance Committee	10,000	35,250
6-21-77	Democratic Finance Committee	(10,000)	25,250
7-21-77	Citizens For Davis for Congress	200	25,450
10-10-77	Democratic House & Senate Council	125	25,575
11-18-77	Democratic House & Senate Council	125	25,700
12-7-77	Democratic Finance Committee	5,000	30,700

1977 AGGREGATE CONTRIBUTIONS MADE BY NATHAN LANDOW TO NATIONAL PARTY POLITICAL COMM.

1-27-77	Democratic National Committee	20,000	20,000
3-4-77	Democratic National Committee	(5,000)	15,000
3-31-77	Democratic National Committee	(250)	14,750
4-8-77	Democratic Finance Committee	5,000	19,750
6-16-77	Democratic Finance Committee	10,000	29,750
6-21-77	Democratic Finance Committee	(10,000)	19,750
12-7-77	Democratic Finance Committee	5,000	24,750

Contributions refunded to Nathan Landow are shown in parenthesis.

2 U.S.C. §441a(a)(3) states that no individual shall make contributions aggregating more than \$25,000 in any calendar year. 2 U.S.C. §441a(a)(1)(B) states that no person shall make contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in any calendar year which, in the aggregate, exceed \$20,000. It appears that Mr. Landow violated 2 U.S.C. §441a(a)(3) by contributing in excess of \$25,000 in 1977; and Mr. Landow violated 2 U.S.C. §441a(a)(1)(B) by contributing in excess of \$20,000 to the Democratic National Committee, and its affiliate, the Democratic Finance Committee.

2 U.S.C. §441a(f) states that no political committee shall knowingly accept any contribution in violation of 2 U.S.C. §441a. Although the reports indicate that these committees may have attempted to comply with the Act by refunding some contributions to Mr. Landow, it appears that the Democratic Finance Committee nevertheless did accept a contribution from Mr. Landow which, when added to Mr. Landow's contributions to the Democratic National Committee, exceeded \$20,000 in the aggregate. We believe that the Commission should find reason to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f) by accepting that contribution and obtain the committees explanation of such acceptance.

RECOMMENDATIONS

1. Find reason to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(3) by exceeding the \$25,000 annual contribution limitation in 1977.

2. Find reason to believe that Mr. Nathan Landow violated 2 U.S.C. §441a(a)(1)(B) by exceeding the \$20,000.00 annual contribution limitation to political committees established and maintained by a national political party.

3. Find reason to believe that the Democratic Finance Committee violated 2 U.S.C. §441a(f) by accepting excess contributions from Mr. Nathan Landow.

4. Send attached letters.

73010764755

Attachment I
MUR 530(78)
D-10

Ref. O.G.C.

CRP

2/14/78



FEDERAL ELECTION COMMISSION

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

FEBRUARY 2, 1978

MEMORANDUM

TO: ORLANDO B. POTTER

THROUGH: LOIS ZELLA *LZ*

FROM: IRENE ALLEN *ja*

SUBJECT: ONE POSSIBLE VIOLATION OF 2 U.S.C. §441a(a)(3) and §441a(a)(1)(B)

Attached is a revised schedule (Attachment 1) of contributions made by one individual to Federally registered political committees during the calendar year 1977. Please note that one column, labeled "Aggregate Year-To-Date for Democratic National Committees," aggregates the contributions made by the individual that fall under the limitations of §441a(a)(1)(B). The other column, labeled "Aggregate Year-To-Date for Individual," aggregates all contributions made by the individual that fall under the limitations of §441a(a)(3). The aggregate year-to-date total of contributions under the limitations of §441a(a)(1)(B) as of 6/21/77, the date of the last contribution reported, is \$19,750. The aggregate year-to-date total of contributions under the limitations of §441a(a)(3) as of 6/21/77, is \$24,750.

If you have any further questions on this matter, please do not hesitate to contact Carroll Bowen of the Party Team.



7 3 0 1.0 0 6 4 7 5 6

73010064757

FEDERAL ELECTION COMMISSION

DATE 23FEB73

SELECTED LIST OF RECEIPTS & EXPENDITURES (C)
SECTION I - INDIVIDUALS

PAGE 24

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE ZIP	DATE ELECTION	AMOUNT
LANDMAN, DORIS KENT COUNTY REPUBLICAN FINANCE COMMITTEE 77FEC/052/2846 #035616 CONTRIBUTION	2640 BOSTON SE	GRAND RAPIDS	MI 49506	8FEB77 PRIMARY APRIL 10 QUARTERLY	300
LANDMAN, LOU MUSKEGON COUNTY REPUBLICAN FINANCE COMMITTEE 77FEC/057/4403 #035527 CONTRIBUTION	749 HOULTON AVE	N MUSKEGON	MI 49445	20JUN77 PRIMARY JULY 10 QUARTERLY	250 AMENDMENT
LANDMEYER, W. E. JR. DR. & MRS. FRIENDS OF MARJORIE HOLT COMMITTEE 78HDE/129/3857 #067859 CONTRIBUTION	4 MILKSHAKE LANE	ANNAPOLIS	MD 21404	10EC77 PRIMARY YEAR END REPORT	125
LANDOLT, GENE KENTUCKY STATE DEMOCRATIC CENTRAL EXECUTIVE COMMITTEE 77FEC/050/0715 #023982 CONTRIBUTION	BOX 428	MURRAY	KY 42071	1JUL77 PRIMARY OCTOBER 10 QUARTERLY	500
LANDON, GLENDA L. DR. DEMOCRATIC PARTY OF WISCONSIN 78FEC/066/4357 #069142 CONTRIBUTION	1506 LONGVIEW ST.	MADISON	WI 53704	30NOV77 PRIMARY YEAR END REPORT	250
LANDON, BARBARA DEMOCRATIC NATIONAL COMMITTEE 78FEC/065/3425 #064150 CONTRIBUTION	4710 BETHESDA AVE.	BETHESDA	MD 20014	60EC77 PRIMARY YEAR END REPORT	1,640
LANDON, NATHAN DAVIS FOR CONGRESS COMMITTEE 77HDE/124/1908 #016199 CONTRIBUTION	4710 BETHESDA AVE.	BETHESDA	MD 20014	13JUN77 GENERAL JULY 10 QUARTERLY	500
LANDON, NATHAN DEMOCRATIC FINANCE COMMITTEE 77FEC/053/1014 #005074 CONTRIBUTION	4710 BETHESDA AVE.	BETHESDA	MD 20014	8APR77 GENERAL 10 DAY PRE-ELECTION	5,000
LANDON, NATHAN DEMOCRATIC FINANCE COMMITTEE 77FEC/055/1968 #009437 CONTRIBUTION	4710 BETHESDA AVE.	BETHESDA	MD 20014	16JUN77 PRIMARY JULY 10 QUARTERLY	10,000
LANDON, NATHAN DEMOCRATIC FINANCE COMMITTEE 78FEC/065/3243 #066218 CONTRIBUTION	4710 BETHESDA AVENUE	BETHESDA	MD 20014	7DEC77 PRIMARY YEAR END REPORT	5,000
LANDON, NATHAN DEMOCRATIC NATIONAL COMMITTEE 77FEC/055/1896 #008775 LOAN REP TO INDIVIDUAL	7220 ARROWOOD	BETHESDA	MD 20024	21JUN77 PRIMARY JULY 10 QUARTERLY	10,000

SELECTED LIST OF RECEIPTS & EXPENDITURES (G)
SECTION I - INDIVIDUALS

CONTRIBUTOR/LENDER/TRANSFERER FILER	STREET ADDRESS	CITY	STATE	ZIP	DATE	ELECTION	AMOUNT
LANDOW, NATHAN CITIZENS FOR DAVIS FOR CONGRESS 77HRE/125/5398 #060170 CONTRIBUTION	7220 ARROWOOD RD.	BETHESDA	MD	20034	21JUL77	PRIMARY OCTOBER 10 QUARTERLY	200
LANDOW, NATHAN DEMOCRATIC CONGRESSIONAL DINNER COMMITTEE 77FEC/055/2258 #011814 CONTRIBUTION	7220 ARROWOOD ROAD	BETHESDA	MD	20034	12APR77	PRIMARY JULY 10 QUARTERLY	5,000
LANDOW, NATHAN DEMOCRATIC HOUSE & SENATE COUNCIL 78FEC/063/1641 #046058 CONTRIBUTION	7220 ARROWOOD ROAD	BETHESDA	MD	20034	10OCT77	PRIMARY YEAR END REPORT	125
LANDOW, NATHAN DEMOCRATIC HOUSE & SENATE COUNCIL 78FEC/063/1641 #046062 CONTRIBUTION	7220 ARROWOOD ROAD	BETHESDA	MD	20034	18NOV77	PRIMARY YEAR END REPORT	125
LANDOW, NATHAN DEMOCRATIC NATIONAL COMMITTEE 77FEC/050/1054 #006323 LOAN FROM INDIVIDUAL	7220 ARROWOOD ROAD	BETHESDA	MD	20034	27JAN77	GENERAL 30 DAY POST-ELECTION	20,000
LANDOW, NATHAN DEMOCRATIC NATIONAL COMMITTEE 77FEC/050/1054 #006593 LOAN REP TO INDIVIDUAL	7220 ARROWOOD ROAD	BETHESDA	MD	20034	4MAR77	GENERAL 30 DAY POST-ELECTION	5,000-
LANDOW, NATHAN DEMOCRATIC NATIONAL COMMITTEE 77FEC/051/1084 #005617 LOAN REP TO INDIVIDUAL	7220 ARROWOOD ROAD	BETHESDA	MD	20034	31MAR77	PRIMARY APRIL 10 QUARTERLY	250-
LANDOW, NATHAN JIM WRIGHT MAJORITY CONGRESS COMMITTEE 78HRE/130/1115 #071930 CONTRIBUTION	7220 ARROWOOD ROAD	BETHESDA	MD	20034	9JAN78	PRIMARY FEBRUARY MONTHLY	2,000
LANDREAU, JOHN L. JR. JOHNSTON SENATE COMMITTEE 78SEN/002/0265 #070775 CONTRIBUTION	6049 FOX CHASE TRAIL	SHREVEPORT	LA	71109	21DEC77	PRIMARY YEAR END REPORT	1,000
LANDREAU, L.E. JOHNSTON SENATE COMMITTEE 77SEN/005/0306 #022504 CONTRIBUTION	8220 GOODWOOD BLVD., SUITE 2-B	BATON ROUGE	LA	70806	21SEP77	PRIMARY OCTOBER 10 QUARTERLY	250
LANDRETH, BERTHA J. NATIONAL CONSERVATIVE POLITICAL ACTION COMMITTEE 77FEC/054/1614 #053578 CONTRIBUTION	3695 LINDEN AVE.	LONG BEACH	CA	90807	18MAY77	PRIMARY JUNE MONTHLY	125

Form 1
 1-77
 U.S. Election Commission
 Washington, D.C.
 20543

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contribu-
 tions or expenditures in excess of \$1,000 in any calendar year in support
 of such candidate(s)

RECEIVED
 SECTION
 1977 FEB 1 12 13:16

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with the campaign must maintain separate records with respect to the election.

1(a) Name of Committee (in full)

DEMOCRATIC NATIONAL COMMITTEE

2. Committee Registration Number

C00002758

1(b) Address (number and street)

1625 Mass. Ave., N.W.

3. Date of Registration (month, day, year)

January 21, 1977; Amendment Date

1(c) City, State and Zip Code

Washington, D.C. 20036

4. Is this an amended statement? ☒ Yes ☐ No

If "Yes," fill in only the sections in which there has been a change

5. Check one

(a) This committee has been established as a political committee

(b) Candidate(s)

(c) Name of Candidate

(d) Party of Candidate

(e) Office of Candidate

(f) Date of Election

(g) Date of Registration

(h) Date of Amendment

(i) Date of Filing

(j) Date of Closing

(k) Date of Opening

(l) Date of Closing

(m) Date of Opening

(n) Date of Closing

(o) Date of Opening

(p) Date of Closing

(q) Date of Opening

(r) Date of Closing

(s) Date of Opening

(t) Date of Closing

(u) Date of Opening

(v) Date of Closing

(w) Date of Opening

(x) Date of Closing

(y) Date of Opening

(z) Date of Closing

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

79040064761



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

J.D. Nelson, Treasurer
Democratic Finance Committee
1625 Massachusetts Ave., N.W.
Washington, D.C. 20036

Re: MUR 530

Dear Mr. Nelson:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that the Democratic Finance Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that your committee and your affiliate, the Democratic National Committee, accepted contributions in excess of the \$20,000.00 limitation of 2 U.S.C. §441a(a)(1)(B) from Mr. Nathan Landow in violation of 2 U.S.C. §441a(f). We have numbered this matter MUR 530.

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

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 Conley Edwards, Jr., staff member assigned to this matter, at 202-523-4143.



202-523-4143.

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

78040064763



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Nathan Landow
7220 Arrowood Road
Bethesda, Maryland 20034

Re: MUR 530

Dear Mr. Landow:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that you may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act").

Specifically, it appears that you violated 2 U.S.C. §441a(a)(3) by exceeding the annual \$25,000.00 contribution limitation for an individual. Also, reports filed with the Commission show that you contributed in excess of \$20,000.00 in 1977 to political committees established by a national political party (the Democratic National Committee and the Democratic Finance Committee) in violation of 2 U.S.C. §441a(a)(1)(B). We have numbered this matter MUR 530.

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

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 Conley Edwards, Jr., the staff member assigned to this matter, at



73040064764



FEDERAL ELECTION COMMISSION

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

FEBRUARY 2, 1978

MEMORANDUM

TO: ORLANDO B. POTTER

THROUGH: LOIS ZELLA *28*

FROM: IRENE ALLEN *20*

SUBJECT: ONE POSSIBLE VIOLATION OF 2 U.S.C. §441a(a)(3) and §441a(a)(1)(B)

Attached is a revised schedule (Attachment 1) of contributions made by one individual to Federally registered political committees during the calendar year 1977. Please note that one column, labeled "Aggregate Year-To-Date for Democratic National Committees," aggregates the contributions made by the individual that fall under the limitations of §441a(a)(1)(B). The other column, labeled "Aggregate Year-To-Date for Individual," aggregates all contributions made by the individual that fall under the limitations of §441a(a)(3). The aggregate year-to-date total of contributions under the limitations of §441a(a)(1)(B) as of 6/21/77, the date of the last contribution reported, is \$19,750. The aggregate year-to-date total of contributions under the limitations of §441a(a)(3) as of 6/21/77, is \$24,750.

If you have any further questions on this matter, please do not hesitate to contact Carroll Bowen of the Party Team.



D-16
MUR 530
Ref. O.G.C.

CRP

2/14/78

7 8 0 4 0 7 6 4 7 6 5



FEDERAL ELECTION COMMISSION

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

January 31, 1978

MEMORANDUM

TO: WILLIAM OLDAKER, OGC

THROUGH: ORLANDO B. POTTER *OBP*
LOIS ZELLA *L. Zella*

FROM: IRENE ALLEN *IA*

SUBJECT: ONE POSSIBLE VIOLATION OF 2 U.S.C. § 441a(a)(3)

As you know, 2 U.S.C. §441a(a)(3), states that:

No individual shall make contributions aggregating more than \$25,000 in any calendar year. For purposes of this paragraph, any contribution made to a candidate in a year other than the calendar year in which the election is held with respect to which such contribution is made, is considered to be made during the calendar year in which such election is held.

In the course of the review and the analysis of the reports of several political committees, this Division made note of one individual who appears to have exceeded the limit for total contributions, as cited above, during the calendar year, 1977.

Attached is an itemized breakdown of the contributions which were made by this individual. (Attachment 1) This is followed by copies of the reports in which these contributions were reported. (Attachment 2)

In your consideration of this matter, please note the following:

1. One of the contributions noted on the attachment was made to a candidate, and can be presumed to apply to the limitation for calendar year 1978. This contribution is included for information purposes only and is not included in the total contributions for calendar year 1977. (Attachment 3)
2. The review of contributions for this individual does not include those contributions which may have been made after 9/30/77. The January 31 Year End Reports, covering the period 10/1/77-12/31/77, have not yet been received by the Commission (with the exception of the Democratic Congressional Dinner Committee). Once the reports have been received, and a review made, your office will be notified of any additional contributions made by this individual



73049064766

3. One of the contributions noted on the attached pages is in the form of a loan endorsement. The committee which received the loan has made several loan repayments resulting in the reduction of the amount of the original endorsement and the releasement of the excessive amount. The releasements are noted on Attachment 1.
4. In addition, it appears that there may have been a violation of §441a(a)(1)(B), however, the excessive amount has subsequently been released by the committee.

We would appreciate your consideration of the matters set forth herein, and we recommend that you act in this matter as you deem necessary. If you have any questions, or if we may be of assistance to you, please do not hesitate to contact Carroll Bowen of the Party Team.

Attachments (3)

78040064767

NAME: NATHAN LANDOW

<u>DATE OF CONTRIBUTION</u>	<u>COMMITTEE NAME</u>	<u>AMOUNT OF CONTRIBUTION</u>	<u>AGGREGATE Y-T-D FOR DEMOCRATIC NAT'L CMTEs* (441a(a)(1)(B))</u>	<u>AGGREGATE Y-T-D FOR INDIVIDUAL (441a(a)(3))</u>
1/27/77	DEMOCRATIC NATIONAL COMMITTEE*	\$20,000 (loan endorsement)	\$20,000	\$20,000
3/4/77	DEMOCRATIC NATIONAL COMMITTEE*	-5,000 (endorsement released)	\$15,000	\$15,000
3/31/77	DEMOCRATIC NATIONAL COMMITTEE*	-250 (endorsement released)	\$14,750	\$14,750
4/8/77	DEMOCRATIC FINANCE COMMITTEE*	\$5,000	\$19,750	\$19,750
4/12/77	DEMOCRATIC CONGRES- SIONAL DINNER COMMITTEE	\$5,000	N/A	\$24,750
6/13/77	DAVIS FOR CONGRESS COMMITTEE	500	N/A	N/A
6/16/77	DEMOCRATIC FINANCE COMMITTEE*	\$10,000	\$29,750	\$34,750
6/21/77	DEMOCRATIC NATIONAL COMMITTEE*	-10,000 (endorsement released)	\$19,750	\$24,750

* The Democratic National Committee and the Democratic Finance Committee are affiliated National Committees with a shared limitation under §441a(a)(1)(B).

CONTRIBUTION INFORMATION:

NAME: NATHAN LANDOW

ADDRESS: variously listed as- 7220 Arrowood Road and 4710 Bethesda Avenue
Bethesda, Maryland Bethesda, Maryland
20034 20014

OCCUPATION: variously listed as- Builder - Property Management;
Owner;
Builder & Developer

7 8 0 4 0 0 6 4 7 6 9

CONTRIBUTOR INFORMATION:

NAME: NATHAN LANDOW

PRINCIPAL PLACE OF BUSINESS:

Landow & Company
Bethesda, Maryland
20014
(NO ENTRY)

30day-MN

Form 278-
Federal Election Commission
2325 K Street, N.W.
Washington, D.C. 20543

Instructions: See page 3 of this form
Schedule 1, 10, 17 and 18-10 of 1970 Form 3

Contribution is not deductible for each
numbered line

Name of Candidate or Committee as full

Democratic National Committee

Full name, mailing address and ZIP code

Wethan Lendow
7220 Arrowood Road
Bethesda, Maryland 20834

Principal place of business

Lendow & Company
Bethesda, Maryland

Occupation

Building - Democratic Management

☐ Check if Contributor is self-employed

Appropriate tax return date P. 3

Date (month,
day, year)

1-27-77

3-4-77

Amount of each
receipt this period

20,000.00

(5,000.00)

15,000.00

Full name, mailing address and ZIP code

Richard H. Millman
1720 H St., N.W.
Washington, D.C. 20036

Principal place of business

Millman & Greenberg
Washington, D.C.

Occupation

Advertising

☐ Check if Contributor is self-employed

Appropriate tax return date P. 3

Date (month,
day, year)

1-37-77

Amount of each
receipt this period

20,000.00

Full name, mailing address and ZIP code

Paul Montgomery, Jr.
1115 West 75th St.
Indianapolis, Ind. 46260

Principal place of business

Colonial Crest Convalescent Center
Indianapolis, Ind.

Occupation

Owner

Polson

☐ Check if Contributor is self-employed

Appropriate tax return date P. 3

Date (month,
day, year)

1-27-77

Amount of each
receipt this period

20,000.00

(2500.00)

17,500.00

Full name, mailing address and ZIP code

Joel McCloskey
34324 Q St., N.W.
Washington, D.C. 20009

Principal place of business

Democratic National Committee
Washington, D.C.

Occupation

Director

☐ Check if Contributor is self-employed

Appropriate tax return date P. 3

Date (month,
day, year)

1-27-77

Amount of each
receipt this period

20,000.00

Full name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Appropriate tax return date P. 3

Date (month,
day, year)

Amount of each
receipt this period

Full name, mailing address and ZIP code

Principal place of business

Occupation

☐ Check if Contributor is self-employed

Appropriate tax return date P. 3

Date (month,
day, year)

Amount of each
receipt this period

Signature of contributor (print name)

Contributor's name (print name of all contributors)

TD Day-WA

Schedule A

July 1975
Federal Election Commission
225 K Street, N.W.
Washington, D.C. 20543

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

Page 2 of 42 for

LINE NUMBER 15

(Use separate schedule for each numbered line)

Name of Candidate or Committee in full			
Democratic Finance Committee			
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Thornton D. Perry P.O. Box 419 Tuskegee, AL 36083		4-11-77	1,000.00
Principal place of business		Occupation	
Perry, Fuller, & Dirk Tuskegee, AL		Attorney	
		<input type="checkbox"/> Check if Contribution is self-employed	
		Aggregate Year to date	\$ 1,000.00
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Thomas C. Tolbert 3565 Summit Blvd. Pensacola, FL 32503		4-11-77	1,000.00
Principal place of business		Occupation	
Balsarub, Cleveland, & Gurd Pensacola, FL		CFA	
		<input type="checkbox"/> Check if Contribution is self-employed	
		Aggregate Year to date	\$ 1,000.00
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Clayton E. Linkous, Jr. 8867 Hunning Tree Rd. Pensacola, FL 32504		4-11-77	1,000.00
Principal place of business		Occupation	
8867 Hunning Tree Rd. Pensacola, FL		Physician	
		<input type="checkbox"/> Check if Contribution is self-employed	
		Aggregate Year to date	\$ 1,000.00
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Mrs. Dorothy V. Bush 222 Harbour Dr. Naples, FL 33940		4-8-77 5-2-77	100.00 100.00
Principal place of business		Occupation	
Democratic Nat'l Committee Washington, D.C.		Secretary	
		<input type="checkbox"/> Check if Contribution is self-employed	
		Aggregate Year to date	\$ 200.00
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
A.G. Gaston P.O. Box 697 Birmingham, AL 35201		4-8-77	100.00
Principal place of business		Occupation	
Smith & Gaston Birmingham, AL		President	
		<input type="checkbox"/> Check if Contribution is self-employed	
		Aggregate Year to date	\$ 100.00
Full Name, mailing address and ZIP code		Date (month, day, year)	Amount of each receipt this period
Nathan Laskow 4716 Bathanda Ave. Bethesda, MD 20814		4-8-77	5,000.00
Principal place of business		Occupation	
Laskow & Co. Bethesda, MD		Builder - Property Mgt.	
		<input type="checkbox"/> Check if Contribution is self-employed	
		Aggregate Year to date	\$ 5,000.00

7 78040064771
77030331014

July 10

Schedule A

July 1976
Federal Election Commission
1100 K Street, N.W.
Washington, D.C. 20543

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

Page 2 of for
Line number 15(c)
(Use separate schedule(s) for each
numbered line)

Name of Candidate or Committee in full

Democratic Congressional Dinner Committee

Full name, mailing address and ZIP code

M. Barron Hilton
1050 Brookline Drive, Holmby Hills, Los Angeles, CA

Principal place of business

Hilton Hotels Corporation
Beverly Hills, CA 90212

Occupation

President

☐ Check if Contributor is self-employed

Appropriate Year to date 4/4

Date (month,
day, year)

4/4

Amount of each
receipt this period

1,000.00

Full name, mailing address and ZIP code

Robert M. Goshorn
9200 Rose Anna Place, Gaithersburg, Maryland 20750

Principal place of business

Washington, D.C.

Occupation

U.S. Government

☐ Check if Contributor is self-employed

Appropriate Year to date 4/12/

Date (month,
day, year)

4/12/

Amount of each
receipt this period

500.00

Full name, mailing address and ZIP code

Walter S. Runwell
4633 North 38th Street, Arlington, Virginia 22207

Principal place of business

Runwell & Bennett Coral Clements
Vienna, Virginia 22180

Occupation

Vice-President

☐ Check if Contributor is self-employed

Appropriate Year to date 4/12

Date (month,
day, year)

4/12

Amount of each
receipt this period

500.00

Full name, mailing address and ZIP code

Nathan London
7229 Archedale Road, Bethesda, Maryland 20814

Principal place of business

Londons & Company
Bethesda, Maryland 20814

Occupation

Owner

☐ Check if Contributor is self-employed

Appropriate Year to date 4/12

Date (month,
day, year)

4/12

Amount of each
receipt this period

5,000.00

Full name, mailing address and ZIP code

Mary R. Latona
1404 Hillstone Drive, Silver Spring, Maryland 20904

Principal place of business

Mr. Colman Pharmacy
Rt. Colman, MD 20822

Occupation

Owner

☐ Check if Contributor is self-employed

Appropriate Year to date 4/12/

Date (month,
day, year)

4/12/

Amount of each
receipt this period

500.00

Full name, mailing address and ZIP code

James H. Pratt
11535 Montgomery Road, Beltsville, Maryland 20705

Principal place of business

Pratt Printing & Connection
Beltsville, MD

Occupation

Owner-Manager

☐ Check if Contributor is self-employed

Appropriate Year to date 4/12

Date (month,
day, year)

4/12

Amount of each
receipt this period

500.00

Full name, mailing address and ZIP code

Pratt Printing & Connection

Full name, mailing address and ZIP code

Pratt Printing & Connection

Full name, mailing address and ZIP code

Pratt Printing & Connection

Full name, mailing address and ZIP code

Pratt Printing & Connection

Full name, mailing address and ZIP code

Pratt Printing & Connection

Full name, mailing address and ZIP code

Pratt Printing & Connection

Donor's Name and Address -			
General, Incorporated 1700 1000 Broadway New York, N.Y. 10018	Date made 6-15-77	Amount of cash 2,000.00	
Name of donor J & B Investment Co. Brooklyn, N.Y.	Signature <input type="checkbox"/> Check of Contributor is self-employed Amount of cash		
General, Incorporated 1700 1000 Broadway New York, N.Y. 10018	Date made 6-15-77	Amount of cash 2,000.00	
Name of donor J & B Investment Co. Brooklyn, N.Y.	Signature <input type="checkbox"/> Check of Contributor is self-employed Amount of cash		
General, Incorporated 1700 1000 Broadway New York, N.Y. 10018	Date made 6-15-77	Amount of cash 2,000.00	
Name of donor J & B Investment Co. Brooklyn, N.Y.	Signature <input type="checkbox"/> Check of Contributor is self-employed Amount of cash		
General, Incorporated 1700 1000 Broadway New York, N.Y. 10018	Date made 6-15-77	Amount of cash 2,000.00	
Name of donor J & B Investment Co. Brooklyn, N.Y.	Signature <input type="checkbox"/> Check of Contributor is self-employed Amount of cash		
General, Incorporated 1700 1000 Broadway New York, N.Y. 10018	Date made 6-15-77	Amount of cash 2,000.00	
Name of donor J & B Investment Co. Brooklyn, N.Y.	Signature <input type="checkbox"/> Check of Contributor is self-employed Amount of cash		
General, Incorporated 1700 1000 Broadway New York, N.Y. 10018	Date made 6-15-77	Amount of cash 2,000.00	
Name of donor J & B Investment Co. Brooklyn, N.Y.	Signature <input type="checkbox"/> Check of Contributor is self-employed Amount of cash		
General, Incorporated 1700 1000 Broadway New York, N.Y. 10018	Date made 6-15-77	Amount of cash 2,000.00	
Name of donor J & B Investment Co. Brooklyn, N.Y.	Signature <input type="checkbox"/> Check of Contributor is self-employed Amount of cash		

Figure 2

Itemized Receipts, Contributions, Loans, Debates, and Transfers

June 1978
 University of North Carolina at Chapel Hill
 100 S. Taper St.
 Chapel Hill, NC 27514

1. *Verpackung des Fasses für 200 L. 200 L. 200 L.*
 (wie Verpackung des Fasses für 200 L.)

Name of the person or organization		Address		City		State		Zip	
1	John Doe	123 Main St	Anytown	CA	90210				
2	Jane Smith	456 Elm St	Springfield	IL	62701				
3	ABC Corporation	789 Market St	New York	NY	10001				
4	XYZ Inc.	101 Broadway	San Francisco	CA	94102				
5	DEF LLC	202 Park Ave	Chicago	IL	60601				
6	GHI Partnership	303 Wall St	Los Angeles	CA	90001				
7	JKL Associates	404 Main St	Phoenix	AZ	85001				
8	MNO Enterprises	505 Elm St	San Diego	CA	92101				
9	PQR Industries	606 Market St	Seattle	WA	98101				
10	STU Corporation	707 Broadway	Portland	OR	97201				
11	VWX LLC	808 Park Ave	Denver	CO	80201				
12	YZA Partnership	909 Wall St	San Jose	CA	95101				
13	BCD Associates	1010 Main St	San Antonio	TX	78201				
14	EFG Enterprises	1111 Elm St	San Jose	CA	95101				
15	HIJ Industries	1212 Market St	San Jose	CA	95101				
16	KLM Corporation	1313 Broadway	San Jose	CA	95101				
17	NOP LLC	1414 Park Ave	San Jose	CA	95101				
18	QRS Partnership	1515 Wall St	San Jose	CA	95101				
19	RST Associates	1616 Main St	San Jose	CA	95101				
20	UVW Enterprises	1717 Elm St	San Jose	CA	95101				
21	XYZ Industries	1818 Market St	San Jose	CA	95101				
22	ABC Corporation	1919 Broadway	San Jose	CA	95101				
23	DEF LLC	2020 Park Ave	San Jose	CA	95101				
24	GHI Partnership	2121 Wall St	San Jose	CA	95101				
25	JKL Associates	2222 Main St	San Jose	CA	95101				
26	MNO Enterprises	2323 Elm St	San Jose	CA	95101				
27	PQR Industries	2424 Market St	San Jose	CA	95101				
28	STU Corporation	2525 Broadway	San Jose	CA	95101				
29	VWX LLC	2626 Park Ave	San Jose	CA	95101				
30	YZA Partnership	2727 Wall St	San Jose	CA	95101				
31	BCD Associates	2828 Main St	San Jose	CA	95101				
32	EFG Enterprises	2929 Elm St	San Jose	CA	95101				
33	HIJ Industries	3030 Market St	San Jose	CA	95101				
34	KLM Corporation	3131 Broadway	San Jose	CA	95101				
35	NOP LLC	3232 Park Ave	San Jose	CA	95101				
36	QRS Partnership	3333 Wall St	San Jose	CA	95101				
37	RST Associates	3434 Main St	San Jose	CA	95101				
38	UVW Enterprises	3535 Elm St	San Jose	CA	95101				
39	XYZ Industries	3636 Market St	San Jose	CA	95101				
40	ABC Corporation	3737 Broadway	San Jose	CA	95101				
41	DEF LLC	3838 Park Ave	San Jose	CA	95101				
42	GHI Partnership	3939 Wall St	San Jose	CA	95101				
43	JKL Associates	4040 Main St	San Jose	CA	95101				
44	MNO Enterprises	4141 Elm St	San Jose	CA	95101				
45	PQR Industries	4242 Market St	San Jose	CA	95101				
46	STU Corporation	4343 Broadway	San Jose	CA	95101				
47	VWX LLC	4444 Park Ave	San Jose	CA	95101				
48	YZA Partnership	4545 Wall St	San Jose	CA	95101				
49	BCD Associates	4646 Main St	San Jose	CA	95101				
50	EFG Enterprises	4747 Elm St	San Jose	CA	95101				

July 10

Rule A
is
Election Commission
Street, R.W.
Inc, D.C. 20463

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

Page 2 of 7
Last number 16
(Use separate schedule for each numbered line)

Name of Candidate or Committee in full

DEMOCRATIC NATIONAL COMMITTEE

Full Name, mailing address and ZIP code

Harry E. Gould, Jr.
145 E. 32nd St.
New York, New York 10016

Principal place of business

Gould Paper Co.
New York, New York

Occupation

President

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 8

Date (month, day, year)

1-27-77
3-31-77

Amount of each receipt this period

20,000.00
(250.00)
19,750.00

Full Name, mailing address and ZIP code

Patrick J. O'Connor
30th Floor, IDS Tower
Minneapolis, Minn 55402

Principal place of business

O'Connor and Hannan
Minneapolis, Minn.

Occupation

Attorney

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 8

Date (month, day, year)

1-27-77
3-31-77

Amount of each receipt this period

20,000.00
(250.00)
19,750.00

Full Name, mailing address and ZIP code

Ira S. Hotchkiss
400 North Park Road
Hollywood, Florida 33021

Principal place of business

Hotchkiss Enterprises
Hollywood, Florida

Occupation

President

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 5

Date (month, day, year)

1-27-77
3-4-77
3-31-77

Amount of each receipt this period

20,000.00
(5,000.00)
(250.00)
14,750.00

Full Name, mailing address and ZIP code

DeJongh Franklin
2400 1st National Bank Tower
Atlanta, Georgia 30303

Principal place of business

2400 First National Bank Tower
Atlanta, Georgia

Occupation

Attorney

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 5

Date (month, day, year)

1-27-77

Amount of each receipt this period

20,000.00

Full Name, mailing address and ZIP code

Nathan Landow
7220 Arrowood Road
Bethesda, Md. 20824

Principal place of business

Landow & Company
Bethesda, Md.

Occupation

Builder-Property Management

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 5

Date (month, day, year)

1-27-77
3-4-77
3-31-77
6-21-77

Amount of each receipt this period

20,000.00
(5,000.00)
(250.00)
14,750.00
(10,000.00)
4,750.00

Full Name, mailing address and ZIP code

Richard M. Millman
1730 M Street, N.W.
Washington, D.C. 20036

Principal place of business

Millman & Greenburg
Washington, D.C.

Occupation

Attorney

☐ Check if Contributor is self-employed

Aggregate Year-to-date \$ 5

Date (month, day, year)

1-27-77
3-31-77

Amount of each receipt this period

20,000.00
(250.00)
19,750.00

Subtotal of entries this page (section 1) \$

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

**Statement of a Candidate
for Nomination or Election to
Federal Office**

("Candidate" as defined by 2 USC #31 (b)(1)
(See reverse side for instructions)

Note: Committees authorized to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1. Name of Candidate (in full)	2. Identification Number (Commission use only)	3. Party Affiliation
Mendel Jackson Davis	NA	Democrat
(b) Address (number and street)	4. Office Sought	
Room 640, Federal Building	U. S. House of Representatives	
(c) City, State and ZIP code	5. District and State of Candidate	
Charleston, S. C. 29403	1st, South Carolina - 02	

Designation of Principal Campaign Committee

6. I hereby designate the following named political committee as my Principal Campaign Committee for the 1978 year of election. (Section 3) Note: The principal campaign committee must be stated on the Federal Commission Form 3.

(a) Name of Committee (in full)
Davis for Congress Committee
(b) Address (number and street)
P. O. Box 10207
(c) City, State and ZIP code
Charleston, S. C. 29411

7. I hereby designate the following national and or State bank(s) as campaign bank(s) for the year of election and the above named committee.

(a) Name of Bank (in full)	(a) Name of Bank
S. C. National Bank	
(b) Address (number and street)	(b) Address (number and street)
16 Broad Street	
(c) City, State and ZIP code	(c) City, State and ZIP code
Charleston, S. C. 29401	
(a) Name of Bank (in full)	(a) Name of Bank
(b) Address (number and street)	(b) Address (number and street)
(c) City, State and ZIP code	(c) City, State and ZIP code

Candidate Reporting Status

8. Check Reporting Status (a) or (b) whichever is applicable:
☐ (a) I hereby certify that the above named committee and authorized agents thereof will receive and receive & disburse all funds in support of my candidacy in this election. Based upon this certification, I hereby request a waiver of the requirement that I file a report of contributions and expenditures on Federal Commission Form 3.

☒ (b) I intend to personally receive contributions and/or make expenditures in support of my candidacy and I shall file reports of such receipts and expenditures as required by 2 USC 434 on Federal Election Commission Form 3.

I certify that I have examined this Statement and, to the best of my knowledge and belief, it is true, correct and complete.

Signature of Candidate

May 12, 1977

Date

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 USC 1457 or 1441. (See reverse side of form.)

For further
information
contact

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20543

7304003473



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 530

