



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 553



78010751111



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

June 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C. M. Millsap
Millsap's
123 East High Street
Jefferson City, MO 65101

Re: MUR 553(78)

Dear Mr. Millsap:

On June 13, 1978, the Federal Election Commission found no reasonable cause to believe that Millsap's has violated 2 U.S.C. § 441b(a) in that this entity was not a corporation at the time it contributed to the Danforth for Senator Committee, although the contribution was made on a business check.

Enclosed for your information is a copy of the General Counsel's Report on MUR 553(78), and a copy of the certification of the Commission's determination. These documents plus a copy of this letter will be included in the public disclosure file of the Danforth for Senator Committee.

If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.

Sincerely,

A handwritten signature in cursive script, reading "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

Enclosures

cc: Danforth for Senator Committee
Senator John C. Danforth

In the Matter of)
)
Creative Marketing Company) MUR 553(78)
Lebanon Motor Sales)
Millsap's)

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 13, 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:

- Commissioner Tiernan was not present at the time of the vote.

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

Received in Office of Commission Secretary: 6-8-78, 3:42
Circulated on 48 hour vote basis: 6-9-78, 12:00

June 7 , 1978

GENERAL COUNSEL'S REPORT

On May 2, 1978, the Office of General Counsel received a letter from Mr. Eugene Smith of Lebanon Motor Sales stating that he is an individual doing business under the name of Lebanon Motor Sales and that he has never done business as a corporation.

He pointed out that at the same time his contribution was made to the Committee there existed a corporation in the same city by the name of Lebanon Motor Sales, hence the existence of possible confusion on the part of the Office of the Secretary of State of Missouri.

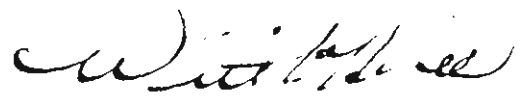
On May 8, 1978, the Commission received a response from Mr. C.M. Millsap stating that Millsap's is a partnership owned by him and his wife. He further explained that Millsap's had once been incorporated but that entity is defunct and was dissolved in 1960.

The Commission sent a letter to Creative Marketing Company which was returned unclaimed from Kansas City, Missouri, dated May 16, 1978. A follow-up telephone call to the Office of the Secretary of State revealed that Creative Marketing Company was not an incorporated entity at the time the contribution was made. It appears that the Secretary of State's Office confused this particular company with a corporation of the same name in a different city.

Recommendation

1. Find no reasonable cause to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's violated 2 U.S.C. §441b(a).
2. Send attached letter.
3. Close the file.

6/6/78
Date



William C. Oldaker
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C. M. Millsap
Millsap's
123 East High Street
Jefferson City, MO 65101

Re: MUR 553(78)

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Sincerely,

William C. Oldaker
General Counsel

Enclosures

cc: Danforth for Senator Committee
Senator John C. Danforth

40-115-8



FEDERAL ELECTION COMMISSION

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

June 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Eugene Smith
Lebanon Motor Sales
411 East Commercial
Lebanon, MO 65536

Re: MUR 553(78)

Dear Mr. Smith:

On June 13, 1978, the Federal Election Commission found no reasonable cause to believe that Lebanon Motor Sales has violated 2 U.S.C. § 441b(a) in that this entity was not a corporation at the time it contributed to the Danforth for Senator Committee, although the contribution was made on a business check.

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If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.

Sincerely,

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

William C. Oldaker
General Counsel

Enclosures

cc: Danforth for Senator Committee
Senator John C. Danforth

In the Matter of)
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Creative Marketing Company) MUR 553(78)
Lebanon Motor Sales)
Millsap's)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 13, 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 no reasonable cause to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's violated 2 U.S.C. §441b(a).
2. Send the draft letters attached to the General Counsel's Report dated June 7 , 1978.
3. Close the file in this matter.

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

6/13/78
Date

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

Received in Office of Commission Secretary: 6-8-78, 3:42
Circulated on 48 hour vote basis: 6-9-78, 12:00

BEFORE THE FEDERAL ELECTION COMMISSION

June 7 , 1978

In the Matter of)
)
Creative Marketing Company) MUR 553(78)
Lebanon Motor Sales)
Millsap's)

GENERAL COUNSEL'S REPORT

1. Summary of allegations and Commission action

During its examination of the records kept by the Danforth for Senate Committee ("the Committee"), the Audit Division discovered apparent evidence of corporate contributions having been made to and accepted by the Committee in seeming violation of 2 U.S.C. § 441b(a). Three of these contributions, in the forms of checks from Creative Marketing Company, Lebanon Motor Sales, and Millsap's, were in the sum of \$100 or more.

On April 25, 1978, the Commission found reason to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's had violated Section 441b(a) by making corporate contributions to the Committee. Because of evidence given the Audit Division concerning the Committee's efforts to screen out corporate contributions, the Commission found no reason to believe that the Committee had knowingly accepted corporate contributions. Letters were sent to the three apparent corporate contributors informing them of the Commission's findings.

Evidence

On May 2, 1978, the Office of General Counsel received a letter from Mr. Eugene Smith of Lebanon Motor Sales stating that he is an individual doing business under the name of Lebanon Motor Sales and that he has never done business as a corporation.

He pointed out that at the same time his contribution was made to the Committee there existed a corporation in the same city by the name of Lebanon Motor Sales, hence the existence of possible confusion on the part of the Office of the Secretary of State of Missouri.

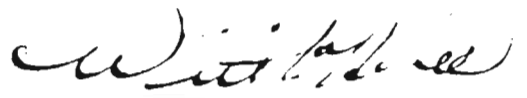
On May 8, 1978, the Commission received a response from Mr. C.M. Millsap stating that Millsap's is a partnership owned by him and his wife. He further explained that Millsap's had once been incorporated but that entity is defunct and was dissolved in 1960.

The Commission sent a letter to Creative Marketing Company which was returned unclaimed from Kansas City, Missouri, dated May 16, 1978. A follow-up telephone call to the Office of the Secretary of State revealed that Creative Marketing Company was not an incorporated entity at the time the contribution was made. It appears that the Secretary of State's Office confused this particular company with a corporation of the same name in a different city.

Recommendation

1. Find no reasonable cause to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's violated 2 U.S.C. §441b(a).
2. Send attached letter.
3. Close the file.

6/6/78
Date



William C. Oldaker
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Eugene Smith
Lebanon Motor Sales
411 East Commercial
Lebanon, MO 65536

Re: MUR 553(78)

Dear Mr. Smith:

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William C. Oldaker
General Counsel

Enclosures

cc: Danforth for Senator Committee
Senator John C. Danforth

AW
6/1/78



FEDERAL ELECTION COMMISSION

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

June 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Max Walters
Creative Marketing Company
900 Washington Street
Kansas City, MO 64105

Re: MUR 553(78)

Dear Mr. Walters:

On June 13, 1978, the Federal Election Commission found no reasonable cause to believe that Creative Marketing Company has violated 2 U.S.C. § 441b(a) in that this entity was not a corporation at the time it contributed to the Danforth for Senator Committee, although the contribution was made on a business check.

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William C. Oldaker
General Counsel

Enclosures

cc: Danforth for Senator Committee
Senator John C. Danforth

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
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Creative Marketing Company) MUR 553(78)
Lebanon Motor Sales)
Millsap's)

CERTIFICATION

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1. Find no reasonable cause to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's violated 2 U.S.C. §441b(a).
2. Send the draft letters attached to the General Counsel's Report dated June 7 , 1978.
3. Close the file in this matter.

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

6/13/78
date

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

Received in Office of Commission Secretary: 6-8-78, 3:42
Circulated on 48 hour vote basis: 6-9-78, 12:00

June 7 , 1978

GENERAL COUNSEL'S REPORT

During its examination of the records kept by the Danforth for Senate Committee ("the Committee"), the Audit Division discovered apparent evidence of corporate contributions having been made to and accepted by the Committee in seeming violation of 2 U.S.C. § 441b(a). Three of these contributions, in the forms of checks from Creative Marketing Company, Lebanon Motor Sales, and Millsap's, were in the sum of \$100 or more.

On April 25, 1978, the Commission found reason to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's had violated Section 441b(a) by making corporate contributions to the Committee. Because of evidence given the Audit Division concerning the Committee's efforts to screen out corporate contributions, the Commission found no reason to believe that the Committee had knowingly accepted corporate contributions. Letters were sent to the three apparent corporate contributors informing them of the Commission's findings.

On May 2, 1978, the Office of General Counsel received a letter from Mr. Eugene Smith of Lebanon Motor Sales stating that he is an individual doing business under the name of Lebanon Motor Sales and that he has never done business as a corporation.

He pointed out that at the same time his contribution was made to the Committee there existed a corporation in the same city by the name of Lebanon Motor Sales, hence the existence of possible confusion on the part of the Office of the Secretary of State of Missouri.

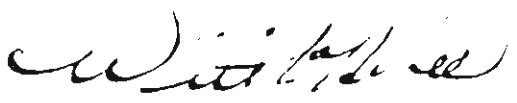
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Recommendation

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2. Send attached letter.
3. Close the file.

6/6/78
Date



William C. Oldaker
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Max Walters
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900 Washington Street
Kansas City, MO 64105

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William C. Oldaker
General Counsel

Enclosures

cc: Danforth for Senator Committee
Senator John C. Danforth

78040931/3

NW
5/13/78

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
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Creative Marketing Company) MUR 553(78)
Lebanon Motor Sales)
Millsap's)

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Date

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Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 6-8-78, 3:42
Circulated on 48 hour vote basis: 6-9-78, 12:00

June 8, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 553

Please have the attached General Counsel's Report on MUR 553 distributed to the Commission on a 48 hour tally basis.

Thank you.

78040055175

June 7, 1978

GENERAL COUNSEL'S REPORT

On April 25, 1978, the Commission found reason to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's had violated Section 441b(a) by making corporate contributions to the Committee. Because of evidence given the Audit Division concerning the Committee's efforts to screen out corporate contributions, the Commission found no reason to believe that the Committee had knowingly accepted corporate contributions. Letters were sent to the three apparent corporate contributors informing them of the Commission's findings.

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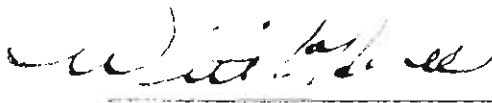
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Date


William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

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

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Lebanon Motor Sales
411 East Commercial
Lebanon, MO 65536

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William C. Oldaker
General Counsel

Enclosures

cc: Danforth for Senator Committee
Senator John C. Danforth



FEDERAL ELECTION COMMISSION

1100 K STREET N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Max Walters
Creative Marketing Company
900 Washington Street
Kansas City, MO 64105

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Sincerely,

William C. Oldaker
General Counsel

Enclosures

cc: Danforth for Senator Committee
Senator John C. Danforth



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C. M. Millsap
Millsap's
123 East High Street
Jefferson City, MO 65101

Re: MUR 553(78)

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Sincerely,

William C. Oldaker
General Counsel

Enclosures

cc: Danforth for Senator Committee
Senator John C. Danforth



FEDERAL ELECTION COMMISSION

1225 K STREET, N.W.
WASHINGTON, D.C. 20543

May 19, 1978

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS

MWE

SUBJECT: MUR 553 (78) - Interim Status Report dated 5-17-78
Received in OCS: 5-18-78. 10:30

The above-mentioned document was circulated on a 24 hour
no-objection basis at 11:30 a.m., May 18, 1978.

As of 1:30 p.m., this date, no objections have been
received in the Office of Commission Secretary to the Interim Status
Report.



May 17, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 553

Please have the attached Interim Status Report
on MUR 553 distributed to the Commission.

Thank you.

7804002132

BEFORE THE FEDERAL ELECTION COMMISSION

May 17, 1978


In the Matter of)
)
Creative Marketing Company) MUR 553(78)
Lebanon Motor Sales & Millsap's)

INTERIM STATUS REPORT

During its examination of the records kept by the Danforth for Senate Committee ("the Committee"), the Audit Division discovered that apparent corporate contributions had been accepted by the Committee in violation of 2 U.S.C. §441b(a). Three of these contributions, those from Creative Marketing Company, Lebanon Motor Sales, and Millsap's, were in the sum of \$100 or more.

The Office of the General Counsel determined that while the Committee had apparently accepted five corporate contributions aggregating in excess of \$100, the evidence given the Audit Division of the Committee's efforts to screen out corporate contributions warranted a finding of no reason to believe that the Committee had knowingly accepted contributions from corporations. On the other hand, a recommendation was made that the Commission find reason to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's violated §441b(a) by making corporate contributions to the Committee. On April 25, 1978, the Commission approved the above recommendation.

5/17/78
Date


William C. Oldaker
 General Counsel

802519

May 2, 1978

1039/11
FEDERAL ELECTION COMMISSION
78 MAY 8 PM 1:22

Ms. Anne A. Weissenborn
Office of the General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

Re: MUR 553(78)

Dear Ms. Weissenborn:

My attorney, Thomas J. O'Neil, of Lebanon, Missouri, contacted you by phone on May 1, 1978 regarding the letter that you wrote to me on April 26, 1978. This letter is in response to both your letter of April 26th and the phone conversation that my attorney had with you on May 1st.

The check that I donated to the Danforth for Senator Committee in the amount of \$100.00 was written on an account that I had at the Commerce Bank of Lebanon under the name of Lebanon Motor Sales. However, that bank account was an individual bank account and I was an individual doing business under the name of Lebanon Motor Sales. The contribution was not made out of a corporation checking account. Moreover, I have never done business through a corporation.

At approximately the same time as the date of my check, September 22, 1976, an individual in Lebanon, Missouri by the name of J. R. Holt was connected with a corporation by the name of Lebanon Motor Sales and perhaps this is where the confusion came in. I have never been connected with the corporation which is operated by Mr. J. R. Holt and has the name of Lebanon Motor Sales.

If there is anything further regarding this matter, I would ask that you please contact my attorney, Thomas J. O'Neil, at his address at Adams At Third, Lebanon, Missouri, 65536, phone number area code 417-532-2101.

Thank you very much.

Very truly yours,

Eugene Smith

Eugene Smith
411 East Commercial
Lebanon, MO 65536

Mr. Eugene Smith
411 E. Commercial
Lebanon, MO 65536

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 MAY 8 PM 1:22

Ms. Anne A. Weissenborn
Office of the General Counsel
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463



MILLSAPS
123 EAST HIGH STREET
JEFFERSON CITY, MISSOURI
**Business
Forms**

GAF CORPORATION
14653 Agate Road
Maryland Heights MO 63042
314 432 6270
FF-100 ELECTION
OFFICE OF THE SECRETARY OF STATE

'78 MAY 6 PM 1:22

MILLSAPS
123 EAST HIGH STREET
JEFFERSON CITY, MO

E. W. Millsaps

802521



NO. 10
10c

22:11 PM 8 MAY 73

FEDERAL ELECTION COMMISSION

1375 K STREET, N.W.
WASHINGTON, D.C. 20543

POSTAGE AND FEES PAID



Mr. Max Walters
Creative Marketing Company
900 Washington Street
Kansas City, Missouri 64105

943844

46 533

- 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 deliveredc
☒ Show to whom, date, and address of deliveryc
☐ RESTRICTED DELIVERY
 Show to whom and date deliveredc
☐ RESTRICTED DELIVERY.
 Show to whom, date, and address of delivery. \$.....
 (CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

721 May Walter
 100 Washington Street
 Kansas City, Mo 64105

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

943844

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

D

CLERK'S
INITIALS

me



FEDERAL ELECTION COMMISSION

1155 K STREET, N.W.
WASHINGTON, D.C. 20543

April 26, 1978

CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Mr. C. H. Millsap
Millsap's
123 E. High Street
Jefferson City, Missouri 65101

RE: MUR 553(78)

Dear Mr. Millsap:

This letter is to inform you that the Federal Election Commission has found reason to believe that your company has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that your company has violated 2 U.S.C. § 3015(a) by having made a corporate contribution to the Danforth for Senate Committee in the amount of \$100 on July 19, 1976. We have numbered this matter MUR 553.

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 consideration of this matter. Where appropriate explanations or statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten days of receipt of this notification. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.



This matter will remain confidential in accordance with 2 U.S.C. §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 yours,

W. C. Oldaker
William C. Oldaker
General Counsel

cc: Senator John C. Danforth

Charles N. Steele
Associate General Counsel

PS Form 3811, Apr. 1977

1. SENDER Complete items 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100. Add your address in the RETURN TO space on reverse.

2. 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)

3. ARTICLE ADDRESSED TO:
William C. Oldaker
1234 1st St
Jefferson City, MO 65101

4. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943847

(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE Addressed Authorize agent

5. DATE OF DELIVERY POSTMARK
5/1/77

6. ADDRESS (Complete only if requested)

7. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL.



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C. M. Millsap
Millsap's
123 E. High Street
Jefferson City, Missouri 65101

RE: MUR 553(78)

Dear Mr. Millsap:

This letter is to inform you that the Federal Election Commission has found reason to believe that your company has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that your company has violated 2 U.S.C. §441b(4) by having made a corporate contribution to the Danforth for Senate Committee in the amount of \$100 on July 19, 1976. We have numbered this matter MUR 553.

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 consideration of this matter. Where appropriate explanations or statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten days of receipt of this notification. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202)523-4039.



-2-

This matter will remain confidential in accordance with 2 U.S.C. §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 yours,

William C. Oldaker
General Counsel

cc: Senator John C. Danforth



FEDERAL ELECTION COMMISSION

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

April 26, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Eugene Smith
Lebanon Motor Sales
411 E. Commercial
Lebanon, Missouri 65536

RE: MUR 553(78)

Dear Mr. Smith:

This letter is to inform you that the Federal Election Commission has found reason to believe that your company has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that your company has violated 2 U.S.C. § 4411(a) by having made a corporate contribution to the Danforth for Senate Committee in the amount of \$100 on September 22, 1976. We have numbered this matter MUR 553.

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 consideration of this matter. Where appropriate explanations or statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten days of receipt of this notification. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.



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Sincerely yours,

William C. Oldaker
William C. Oldaker
General Counsel

cc: Senator John C. Danforth

Charles H. Steele
Associate General Counsel

PS Form 3811, Apr. 1977

44-553

● 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:
 7117 Eugene Smith
 4115 Commercial
 February 7, 1978 65596

3. ARTICLE DESCRIPTION:
 REGISTERED NO. CERTIFIED NO. INSURED NO.
 943835

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressor Authorized agent

4. DATE OF DELIVERY
 5-1-78

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL



FEDERAL ELECTION COMMISSION

125 K STREET NW
WASHINGTON DC 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Eugene Smith
Lebanon Motor Sales
411 E. Commercial
Lebanon, Missouri 65536

RE: MUR 553(78)

Dear Mr. Smith:

This letter is to inform you that the Federal Election Commission has found reason to believe that your company has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that your company has violated 2 U.S.C. §441b(a) by having made a corporate contribution to the Danforth for Senate Committee in the amount of \$100 on September 22, 1976. We have numbered this matter MUR 553.

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 consideration of this matter. Where appropriate explanations or statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten days of receipt of this notification. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4039.



-2-

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Sincerely yours,

William C. Oldaker
General Counsel

cc: Senator John C. Danforth



FEDERAL ELECTION COMMISSION

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

April 26, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Max Walters
Creative Marketing Company
900 Washington Street
Kansas City, Missouri 64105

RE: MUR 553(78)

Dear Mr. Walters:

This letter is to inform you that the Federal Election Commission has found reason to believe that your company has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that your company has violated 2 U.S.C. 5441b(a) by having made a corporate contribution to the Danforth for Senate Committee in the amount of \$125 on October 13, 1976. We have numbered this matter MUR 553.

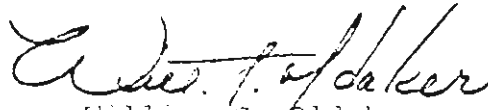
Under the Act you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Where appropriate explanations or statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten days of receipt of this notification. If you have any questions, please contact Anne A. Weisselborn, the attorney assigned to this matter, at (202) 520-4039.



This matter will remain confidential in accordance with 2 U.S.C. §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 yours,


William C. Oldaker
General Counsel

cc: Senator John C. Danforth

Charles N. Steele
Assistant General Counsel



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Max Walters
Creative Marketing Company
900 Washington Street
Kansas City, Missouri 64105

RE: MUR 553(78)

Dear Mr. Walters:

This letter is to inform you that the Federal Election Commission has found reason to believe that your company has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that your company has violated 2 U.S.C. §441b(a) by having made a corporate contribution to the Danforth for Senate Committee in the amount of \$125 on October 18, 1976. We have numbered this matter MUR 553.

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 consideration of this matter. Where appropriate explanations or statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten days of receipt of this notification. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202)523-4039.



-2-

This matter will remain confidential in accordance with 2 U.S.C. §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 yours,

William C. Oldaker
General Counsel

cc: Senator John C. Danforth

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Creative Marketing Company)
Lebanon Motor Sales)
Millsap's)

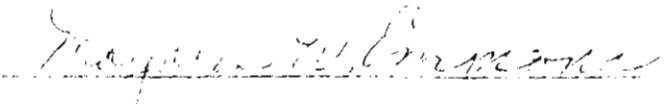
MUR 553 (14)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 24, 1978, the Commission approved without objection the recommendations in the First General Counsel's Report dated April 20, 1978 in the above-captioned matter as follows:

1. Find no reason to believe that the Danforth for Senate Committee knowingly accepted corporate contributions in violation of 2 U.S.C. §441b(a).
2. Find reason to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's violated 2 U.S.C. §441b(a) by making corporate contributions to the Danforth for Senate Committee.
3. Send the letters attached to the First General Counsel's Report.

Date: 4-20-78


Marjorie W. Emmons
Secretary to the Commission

Report Dated:	4-20-78
Received in Office of Commission Secretary:	4-20-78, 3:49
Circulated on 24 hour no-objection basis:	4-21-78, 11:00



FEDERAL ELECTION COMMISSION

1155 K STREET, N.W.
WASHINGTON, D.C. 20543

APRIL 24, 1978

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE EMMONS *ME*
RE: GENERAL COUNSEL REPORTS ON COMPLIANCE MATTERS

At 11:00 a.m. on Friday, April 21, 1978, the Office of the Commission Secretary circulated the General Counsel's Reports on the following MURS to the Commission:

MUR 495

MUR 553

MUR 536

MUR 527

These documents were circulated on a no-objection basis, and at noon on April 24, 1978, our office has received no objections to the recommendations contained in the above-named reports

April 20, 1978

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR553

Please have the attached 7 day report on MUR 553 distributed to the Commission on a 24 hour no-objection basis.

Thank you.

7804005121

FEDERAL ELECTION COMMISSION

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

APR 11 1973

MUR # 553

STAFF Weissenborn

COMPLAINANT'S NAME: Internally generated (Audit).
See attached audit memo.

RESPONDENTS' NAMES: Creative Marketing Company;
Lebanon Motor Sales;
Millsap's

SUMMARY OF ALLEGATIONS

During its examination of the records kept by the Danforth for Senate Committee ("the Committee"), the Audit Division discovered that six apparent corporate contributions had been accepted by the Committee. (See Audit Memo). The making of such contributions constitutes a violation of 2 U.S.C. §441b(a) on the parts of the corporations involved, while knowing acceptance by the Committee would also be a violation of Section 441b(a). Three of these contributions, those from Creative Marketing Company, Lebanon Motor Sales, and Millsap's, were in the sum of \$100 or more.

PRELIMINARY LEGAL ANALYSIS

The audit of the Committee disclosed contributions made by means of checks drawn on the accounts of six business entities. The Office of the Secretary of State of Missouri confirmed that there were corporations registered in the names of each of these businesses.

Three of the six checks were in amounts of \$100 or more. One of the contributions was refunded on September 28, 1978, thirteen days after receipt, while the remaining five were refunded on March 17, 1978.

According to the Audit Division, the Committee attempted to systematically screen out corporate contributions by contacting questionable contributors by telephone to ask whether the funds involved in the contribution were personal or not. The policy was to note the telephone contact on the back of the appropriate contributor card and to retain or refund the contribution on the basis of the contributor's answer. Approximately one half of the Committee's contributor cards involving contributions from other than individuals bore such notations concerning telephone inquiries, including the cards for five of the six contributions noted above. The one exception involved the contributor card for Millsap's.

It is the opinion of the Office of General Counsel that while it is apparent that the Committee in fact accepted five corporate contributions aggregating in

excess of \$100 which were not immediately returned to the contributors, the evidence given the Audit Division of the Committee's efforts to screen out corporate contributions warrants a finding of no reason to believe that the Committee knowingly accepted contributions from corporations.

We recommend a finding of reason to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's violated 2 U.S.C. §441b(a) by making corporate contributions to the Committee.

RECOMMENDATIONS

1. Find no reason to believe that the Danforth for Senate Committee knowingly accepted corporate contributions in violation of 2 U.S.C. §441b(a).
2. Find reason to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's violated 2 U.S.C. §441b(a) by making corporate contributions to the Danforth for Senate Committee.
3. Send attached letters.

AUDIT MEMO



FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, DC 20543

March 12, 1978

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER *OB.P.*
STAFF DIRECTOR

FROM: *AC* BOB COSTA/RICK HALTER *rv*

SUBJECT: DANFORTH FOR SENATOR COMMITTEE -
POSSIBLE CORPORATE CONTRIBUTIONS

During the audit of the Danforth for Senator Committee, it was noted that six (6) contributions from six (6) corporations were accepted by the Committee (see Attachment I). The appropriate Secretary of State verified the corporate status on March 3, 1978.

The Committee informed us that the following procedure was followed to insure that corporate contributions were not accepted: When a contribution was received from other than an individual (i.e. business or partnership) the contributor was contacted by telephone and queried as to the source of the contribution (i.e. corporate or personal funds). The contribution was either accepted or rejected based upon the response given.

On March 9, 1978, we recommended that the Committee refund the contributions noted above. The Committee stated that the refund checks should be mailed by Tuesday, March 14, 1978, and the Audit staff will be furnished with a copy of each letter and refund check. In addition, the Committee will furnish copies of the cancelled checks (front and back) upon receipt of their bank statement.

This matter is referred to your office for consideration as a possible MUR. If you have any questions, please contact Rick Halter on extension 3-4155.

Attachment as stated



ATTACHMENT I

SCHEDULE OF POSSIBLE CORPORATE CONTRIBUTIONS

<u>NAME OF ENTITY</u>	<u>DATE OF CONTRIBUTOR CHECK</u>	<u>AMOUNT</u>	<u>DATE OF INCORPORATION</u>
Creative Marketing Co.*	10/18/76	\$125.00	
Dianne L. Davis/ Delozier Realty	9/7/76	25.00	5/22/64
Economy Products Co.	10/29/76	25.00	4/17/58
The P.D. George Co.**	9/15/76	50.00	6/1/21
Lebanon Motor Sales	9/22/76	100.00	9/7/76
Millsap's	7/19/76	100.00	1/2/57
TOTAL		<u>\$425.00</u>	

* Missouri Corporation #146890 - incorporated February 9, 1971. Corporate Charter forfeited, but not revoked, January 1, 1975 for non-filing of 1974 reports.

** Refunded September 28, 1976 by Committee.
(all others refunded March 17, 1978)



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20063

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. C. M. Millsap
Millsap's
123 E. High Street
Jefferson City, Missouri 65101

RE: MUR 553(78)

Dear Mr. Millsap:

This letter is to inform you that the Federal Election Commission has found reason to believe that your company has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that your company has violated 2 U.S.C. §41b(a) by having made a corporate contribution to the Danforth for Senate Committee in the amount of \$100 on July 19, 1976. We have numbered this matter MUR 552.

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 consideration of this matter. Where appropriate explanations or statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten days of receipt of this notification. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202)523-4039.



-2-

This matter will remain confidential in accordance with 2 U.S.C. §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 yours,

William C. Oldaker
General Counsel

cc: Senator John C. Danforth



FEDERAL ELECTION COMMISSION

1375 K STREET, N.W.
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Max Walters
Creative Marketing Company
900 Washington Street
Kansas City, Missouri 64105

RE: MUR 553(78)

Dear Mr. Walters:

This letter is to inform you that the Federal Election Commission has found reason to believe that your company has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that your company has violated 2 U.S.C. §44b(a) by having made a corporate contribution to the Danforth for Senate Committee in the amount of \$125 on October 13, 1976. We have numbered this matter MUR 552.

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 consideration of this matter. Where appropriate explanations or statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten days of receipt of this notification. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202)523-4039.



-2-

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Sincerely yours,

William C. Oldaker
General Counsel

cc: Senator John C. Danforth



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Eugene Smith
Lebanon Motor Sales
411 E. Commercial
Lebanon, Missouri 65536

RE: MUR 553(78)

Dear Mr. Smith:

This letter is to inform you that the Federal Election Commission has found reason to believe that your company has violated the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, the Commission has found reason to believe that your company has violated 2 U.S.C. §44b(a) by having made a corporate contribution to the Danforth for Senate Committee in the amount of \$100 on September 22, 1976. We have numbered this matter MUR 552.

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 consideration of this matter. Where appropriate explanations or statements should be submitted under oath.

The Commission is under a duty to investigate this matter expeditiously. Therefore, any statements or explanations which you wish to submit to the Commission with regard to this matter should be submitted within ten days of receipt of this notification. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202)523-4039.



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Sincerely yours,

William C. Oldaker
General Counsel

cc: Senator John C. Danforth

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Creative Marketing Company)	MUR 553 (78)
Lebanon Motor Sales)	
Millsap's)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April , 1978, the Commission adopted the recommendations of the General Counsel as follow:

1. Find no reason to believe that the Danforth for Senate Committee knowingly accepted corporate contributions in violation of 2 U.S.C. §441b(a).
2. Find reason to believe that Creative Marketing Company, Lebanon Motor Sales, and Millsap's violated 2 U.S.C. §441b(a) by making corporate contributions to the Danforth for Senate Committee.
3. Send attached letters.



FEDERAL ELECTION COMMISSION

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

March 13, 1978

MEMORANDUM

TO: WILLIAM OLDAKER

THROUGH: ORLANDO B. POTTER *OBP*
STAFF DIRECTOR

FROM: *AK* BOB COSTA/RICK HALTER *rh*

SUBJECT: DANFORTH FOR SENATOR COMMITTEE -
POSSIBLE CORPORATE CONTRIBUTIONS

During the audit of the Danforth for Senator Committee, it was noted that six (6) contributions from six (6) corporations were accepted by the Committee (see Attachment I). The appropriate Secretary of State verified the corporate status on March 3, 1978.

The Committee informed us that the following procedure was followed to insure that corporate contributions were not accepted: When a contribution was received from other than an individual (i.e. business or partnership) the contributor was contacted by telephone and queried as to the source of the contribution (i.e. corporate or personal funds). The contribution was either accepted or rejected based upon the response given.

On March 9, 1978, we recommended that the Committee refund the contributions noted above. The Committee stated that the refund checks should be mailed by Tuesday, March 14, 1978, and the Audit staff will be furnished with a copy of each letter and refund check. In addition, the Committee will furnish copies of the cancelled checks (front and back) upon receipt of their bank statement.

This matter is referred to your office for consideration as a possible MUR. If you have any questions, please contact Rick Halter on extension 3-4155.

Attachment as stated



SCHEDULE OF POSSIBLE CORPORATE CONTRIBUTIONS

<u>NAME OF ENTITY</u>	<u>DATE OF CONTRIBUTOR CHECK</u>	<u>AMOUNT</u>	<u>DATE OF INCORPORATION</u>
Creative Marketing Co.*	10/18/76	\$125.00	
Dianne L. Davis/ Delozier Realty	9/7/76	25.00	5/22/64
Economy Products Co.	10/29/76	25.00	4/17/58
The P.D. George Co.**	9/15/76	50.00	6/1/21
Lebanon Motor Sales	9/22/76	100.00	9/7/76
Millsap's	7/19/76	100.00	1/2/57
TOTAL		<u>\$425.00</u>	

* Missouri Corporation #146390 - incorporated February 9, 1971. Corporate Charter forfeited, but not revoked, January 1, 1975 for non-filing of 1974 reports.

** Refunded September 28, 1976 by Committee.



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 553

