



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1012

Date Filmed 10/5/74 Camera No. --- 2

Cameraman SPC



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 27, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold Cohn
President
First National Bank of Lincolnwood
6401 N. Lincoln Avenue
Lincolnwood, Illinois 60645

RE: MUR 1012

Dear Mr. Cohn:

This is to confirm our receipt of your letter dated August 30, 1979 in connection with the Commission's investigation in the captioned matter. After considering the information you provided, the Commission determined, on September 26, to take no further action and close its file on this matter.

At the same time, the Commission reminds you that the making of contributions/expenditures to any candidate, campaign committee or political party or organization in connection with any election is in violation of 2 U.S.C. §441b of the Federal Election Campaign Act of 1971, as amended. This prohibited activity includes the buying of tickets or political advertisements.

Sincerely,

A handwritten signature in cursive script, which appears to read "William C. Oldaker", is written over the typed name.

William C. Oldaker
General Counsel

79040160271

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold Cohn
President
First National Bank of Lincolnwood
6401 N. Lincoln Avenue
Lincolnwood, Illinois 60645

RE: MUR 1012

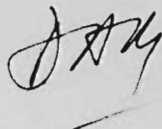
Dear Mr. Cohn:

This is to confirm our receipt of your letter dated August 30, 1979 in connection with the Commission's investigation in the captioned matter. After considering the information you provided, the Commission determined, on September , to take no further action and close its file on this matter.

At the same time, the Commission reminds you that the making of contributions/expenditures to any candidate, campaign committee or political party or organization in connection with any election is in violation of 2 U.S.C. §441b of the Federal Election Campaign Act of 1971, as amended. This prohibited activity includes the buying of tickets or political advertisements.

Sincerely,

William C. Oldaker
General Counsel



7 9 0 4 0 1 6 0 2 7 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

First National Bank of)
Lincolnwood, Illinois)

MUR 1012

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 26, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated September 21, 1979, regarding the above-captioned matter:

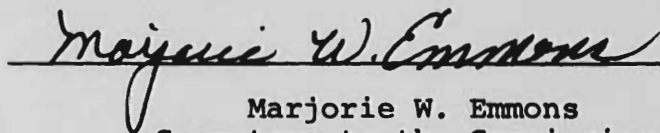
1. Take no further action against the First National Bank of Lincolnwood, Illinois.
2. Close the file.
3. Send the letter attached to the above-named report.

Voting for this determination were Commissioners Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

9/26/79

Date


Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 9-21-79, 4:13
Circulated on 48 hour vote basis: 9-24-79, 11:00

79040160273

September 21, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1012

Please have the attached General Counsel's Report
on MUR 1012 distributed to the Commission on a 48 hour
tally basis.

Thank you.

70040160274

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 SEP 21 P 4: 13

In the Matter of)
)
First National Bank of) MUR 1012
Lincolnwood, Illinois)

GENERAL COUNSEL'S REPORT

BACKGROUND

On August 20, 1979, the Commission adopted the recommendation of the General Counsel and found reason to believe that the First National Bank of Lincolnwood, Illinois violated 2 U.S.C. §441b by making contributions/expenditures to local political organizations. On August 22, a letter was sent notifying the bank of the Commission's finding.

ANALYSIS

This violation of 2 U.S.C. §441b involves contributions/expenditures totalling \$490.00 over a two year period. The expenditures were primarily for the purchase of political ads. In response to the letter of notification, Harold Cohn, President of the respondent bank indicated that the bank did not believe the contributions/expenditures for ads were in violation of the Act. (Attachment A). Mr. Cohn indicated that Comptroller rulings on campaign contributions by national banks in 1974 and 1976 failed to make the Act clear. ^{1/} In fact, the 1976 circular to which Mr. Cohn seems to make reference makes no reference to the purchase of political ads by national banks. (Attachment B).

^{1/} The Office of the Comptroller and this office are currently preparing a public notice to all national banks making them aware of the prohibitions contained in §441b.

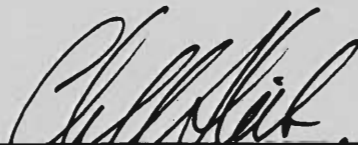
79040160275

Mr. Cohn has also indicated that the bank was made whole for the contributions/expenditures by its directors and that steps have been taken to preclude any further activity of this type. Although only reimbursement by the recipients would constitute proper compliance, in light of the fact that the bank appeared uninformed that \$441b covers the purchase of political ads and that the bank officers have made restitution of the \$490, the General Counsel recommends that the Commission take no further action and close the file.

RECOMMENDATION

1. Take no further action against the First National Bank of Lincolnwood, Illinois.
2. Close the file.
3. Send the attached letter.

21 Sept 1979
Date



William C. Oldaker
General Counsel

Attachments

Respondent letter of August 30 (Attachment A)
Letter to Harold Cohn
Attachments B

79040160276

GCCH

11016

ATTACHMENT A D. Brown



903950

CORNER OF LINCOLN AND DEVON

TELEPHONE: CHICAGO 583-4800 LINCOLNWOOD 676-3000

LINCOLNWOOD, ILLINOIS 60645

HAROLD COHN
PRESIDENT & VICE CHAIRMAN OF BOARD

August 30, 1979

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

RE: MUR 1012

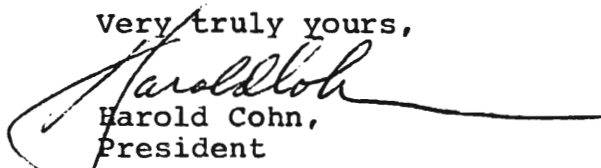
Dear Mr. Oldaker:

In response to your August 22'nd communication on the above referenced matter, we can only report that the actions taken by the Bank in placing the ads considered to be in violation were done with the belief they were not in violation of any of the Federal statutes.

The Comptroller of the Currency ruling on campaign contributions by National banks under 18 USC 610 in 1974, and subsequent instructions of the Comptroller of the Currency on campaign contributions issued in 1976, were apparently not properly interpreted and still unclear.

The Bank has been fully reimbursed by the Directors for all expenditures cited in your August 22nd letter and, moreover, steps have been taken by the Bank so as to preclude actions that may inadvertently result in any further violations of the Federal statutes.

Very truly yours,


Harold Cohn,
President

ATTACHMENT B

RECEIVED
FEDERAL ELECTION
COMMISSION

Comptroller of the Currency
Administrator of National Banks

79 MAR 21 AM 11:42

Washington, D.C. 20219

December 17, 1976

Banking Circular No. 82

TO: Presidents of All National Banks

SUBJECT: Campaign Contributions by National Banks

On May 11, 1976, the Congress enacted P.L. 94-283 which included Amendments to the Federal Election Campaign Act of 1971 as amended.^{1/} The amendments continue to declare it unlawful for a national bank to make a contribution or expenditure in connection with any election to any political office or in connection with any primary election or political convention or caucus held to select candidates for any political office. This prohibition on national banks applies equally to Federal, State or local elections.^{2/} The term "contribution" excludes a bona fide loan of money by a national bank made in accordance with applicable banking laws and regulations and in the ordinary course of business.^{3/}

The Federal Election Commission is given exclusive primary jurisdiction with respect to civil enforcement of the Act.^{4/}

The new statute likewise gives exclusive authority to the Commission to provide advisory and binding opinions as to

^{1/}

Section 201 of this P.L. repealed 18 U.S.C. §610. Section 112(2) (2 U.S.C. §441b) of the P.L. is the apparent new approach to what was 18 U.S.C. §610. (Pamphlet compilations of the Act, as incorporated into the United States Code are available from the Federal Election Commission).

^{2/}

See regulation promulgated by the Federal Election Commission 41 FR 35932, 35956, August 25, 1976 (Section 114.2 prohibitions on contributions and expenditures).

^{3/}

See generally, H.R. Rep. No. 94-1057, 94th Cong., 2d Sess. 59-64 (1976).

^{4/}

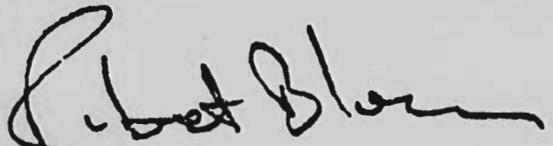
26 U.S.C. §9001 and 9031.

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violations of the Campaign Act.^{5/} This provision insulates any person who seeks and obtains an advisory opinion from the Commission from being subject to any sanction provided by the Act so long as the requesting party's behavior conforms to the Commission's conclusions. Requests for advisory opinions must originate in writing with one of the following:

1. any individual holding Federal Office;
2. any candidate for Federal Office;
3. any political committee; or
4. the national committee of any political party.

Where an advisory opinion has not been sought and the Act may have been violated, there are provisions by which the Commission will attempt to correct the violations of the Act. This Circular is being issued to alert the national banks to the changes in the law and the availability of the Commission for advisory opinion.^{6/} All inquiries regarding political contributions should be directed to the Federal Election Commission by an authorized individual or entity in compliance with the provisions of the new Act.


Robert Bloom
Acting Comptroller of the Currency

5/

2 U.S.C. §437(a) (b).

6/

The Federal Election Commission has published proposed regulations to implement the provisions of the Campaign Act. 41 FR 35932, August 25, 1976. The regulations may not be prescribed by the Commission in final form until the expiration of thirty legislative days without disapproval by either the House or the Senate. The proposed regulations were submitted to Congress on August 3, 1976.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold Cohn
President
First National Bank of Lincolnwood
6401 N. Lincoln Avenue
Lincolnwood, Illinois 60645

RE: MUR 1012

Dear Mr. Cohn:

This is to confirm our receipt of your letter dated August 30, 1979 in connection with the Commission's investigation in the captioned matter. After considering the information you provided, the Commission determined, on September , to take no further action and close its file on this matter.

At the same time, the Commission reminds you that the making of contributions/expenditures to any candidate, campaign committee or political party or organization in connection with any election is in violation of 2 U.S.C. §441b of the Federal Election Campaign Act of 1971, as amended. This prohibited activity includes the buying of tickets or political advertisements.

Sincerely,

William C. Oldaker
General Counsel

79040160280

6001
11016



903950

CORNER OF LINCOLN AND DEVON

TELEPHONE: CHICAGO 583-4800 LINCOLNWOOD 676-3000

LINCOLNWOOD, ILLINOIS 60445

HAROLD COHN
PRESIDENT & VICE CHAIRMAN OF BOARD

August 30, 1979

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

RE: MUR 1012

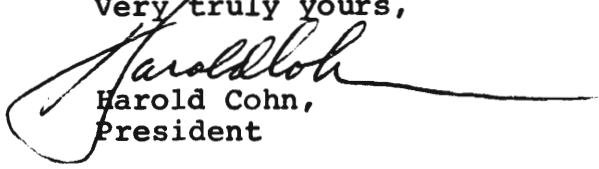
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The Comptroller of the Currency ruling on campaign contributions by National banks under 18 USC 610 in 1974, and subsequent instructions of the Comptroller of the Currency on campaign contributions issued in 1976, were apparently not properly interpreted and still unclear.

The Bank has been fully reimbursed by the Directors for all expenditures cited in your August 22nd letter and, moreover, steps have been taken by the Bank so as to preclude actions that may inadvertently result in any further violations of the Federal statutes.

Very truly yours,


Harold Cohn,
President

79040160281

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RETURN RECEIPT REQUESTED

CERTIFIED

P06 8159368

MAIL



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

RETURN RECEIPT REQUESTED



FEDERAL ELECTION COMMISSION

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

August 22, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold Cohn
President
First National Bank of Lincolnwood
6401 N. Lincoln Avenue
Lincolnwood, Illinois

RE: MUR 1012

Dear Mr. Cohn:

This letter is to notify you that the Federal Election Commission has received information from the Comptroller of the Currency which indicates that certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act") may have been committed. We have numbered this matter MUR 1012. The Commission has reason to believe that the matters alleged state a violation of 2 U.S.C. §441b. Specifically, it appears that the First National Bank of Lincolnwood made several contributions/expenditures to various local Democratic organizations in Illinois between July, 1976 and July, 1978 totalling \$490.00.

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 Duane Brown, the attorney assigned to this matter, at (202) 523-4057.

79040160283

Harold Cohn
Page 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 wish to be represented by counsel, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

79040160284

PS Form 3811, Nov. 1977 RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

MUR 122- D.H. 100

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

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

2. ARTICLE ADDRESSED TO:
HAROLD COHN

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
943618
(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
8/30/79 August 30 1979 AM
CHICAGO, ILL. POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

☆GPO: 1977-0-249-595

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold Cohn
President
First National Bank of Lincolnwood
6401 N. Lincoln Avenue
Lincolnwood, Illinois

RE: MUR 1012

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79010285

Harold Cohn
Page 2

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Sincerely,

William C. Oldaker
General Counsel

WCO
8/30/9

7 9 0 4 0 1 6 0 2 2 8 6

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
First National Bank of)
Lincolnwood, Illinois)

MUR 1012

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 20, 1979, the Commission determined by a vote of 6-0 to adopt the following recommendations, as set forth in the First General Counsel's Report dated August 16, 1979, regarding the above-captioned matter:

1. Find reason to believe that the First National Bank of Lincolnwood, Illinois violated 2 U.S.C. §441b of the Act.
2. Send the appropriate letter.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

8-20-79

Date

Margaret E. Chaney
for Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 8-16-79, 9:56
Circulated on 48 hour vote basis: 8-16-79, 4:00

79040160287

August 16, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1012

Please have the attached First General Counsel's
Report on MUR 1012 distributed to the Commission on a
48 hour tally basis.

Thank you.

79010160288

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

79 AUG 16 A 9: 56

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION AUG 16 1979

MUR NO. 1012

STAFF
MEMBER D. Brown

COMPLAINANT'S NAME: Referral from Comptroller of Currency

RESPONDENT'S NAME: First National Bank of Lincolnwood, Illinois

RELEVANT STATUTE: 2 U.S.C. §441b

INTERNAL REPORTS CHECKED: None

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

BACKGROUND

As a result of information discovered during the course of a recent examination of the First National Bank of Lincolnwood, Illinois, the Senior Deputy Comptroller for Bank Supervision referred this matter to the Commission alleging possible violations of the Act.

FACTS

The respondent bank made thirteen contributions to various local Democratic organizations in Illinois between July, 1976 and July, 1978 totalling \$490.00. Specifically, expenditures were made for the purchase of advertising space in local political "ad books".

79040160289

ANALYSIS

Under 2 U.S.C. §441b of our Act, national banks are prohibited from making any "contribution or expenditure" in connection with any election to any political office. 2 U.S.C. §441b(b)(2) provides that:

". . . [T]he term 'contribution or expenditure' shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money. . . or anything of value . . . to any candidate, campaign committee, or political committee or organization in connection with any election. . . ".

It appears that the expenditures by the First National Bank of Lincolnwood constitute a "contribution or expenditure" in connection with an election and therefore is in violation of 2 U.S.C. §441b of our Act.

RECOMMENDATION

1. Find reason to believe that the First National Bank of Lincolnwood, Illinois violated 2 U.S.C. §441b of our Act.
2. Send the appropriate letter.

Attachment

Referral
Letter to Harold Cohn

79040160290



RECEIVED
FEDERAL ELECTION
COMMISSION

Comptroller of the Currency
Administrator of National Banks

79 JUL 18 PM 2:55

Washington, D.C. 20219

July 16, 1979

903155

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

Dear Mr. Oldaker:

During the course of the most recent examination of the First National Bank, Lincolnwood, Illinois, commencing September 17, 1978, by the Comptroller's Regional Office in Chicago, several possible violations of 2 U.S.C. 441b were revealed. Specifically, thirteen political contributions made between July 30, 1976 and July 24, 1978 to various Democratic Organizations were disclosed, in the aggregate amount of \$490. All these funds were apparently extended for the purchase of advertisements in local "ad books."

In light of the Federal Election Commission's jurisdiction over potential violations of 2 U.S.C. 441b, we believe that this information should be referred to you for your independent investigation and review. If we can be of any further assistance please contact the Enforcement and Compliance Division of the Office of the Comptroller of the Currency at 447-1983.

Sincerely,

Paul M. Homan

Paul M. Homan
Senior Deputy Comptroller for Bank Supervision

Attachments

79 JUL 18 PM 4:43

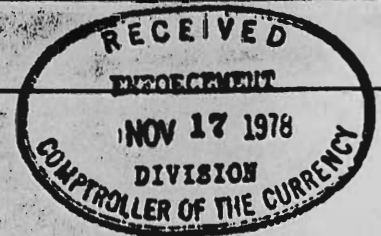
RECEIVED
OFFICE OF THE
GENERAL COUNSEL

79010160291

MEMORANDUM

Comptroller of the Currency
Administrator of National Banks

Seventh National Bank Region
Sears Tower, Suite 5750
233 South Wacker Drive
Chicago, Illinois 60606



To: Robert B. Serino, Director
Enforcement & Compliance Division

From: John P. Sherry, Regional Counsel

Date: November 13, 1978

Subject: First National Bank
Lincolnwood, Illinois

J.P. Sherry

I. Summary

During the course of the most recent examination of referenced Bank, commencing September 17, 1978, several possible violations of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. §413, et seq.), were revealed. Possible contributions to political committees were reflected in the advertising expense records of the Bank, as follows:

	<u>Recipients</u>	<u>Date</u>	<u>Amount</u>
1.	40th Ward Regular Democratic Organization	7/30/76	\$ 25.00
2.	48th Ward " " " " "	9/3/76	25.00
3.	39th Ward " " " " "	10/11/76	25.00
4.	Niles Twp. " " " " "	5/6/77	25.00
5.	40th Ward " " " " "	5/28/77	25.00
6.	Niles Twp. " " " " "	8/9/77	25.00
7.	40th Ward " " " " "	9/3/77	100.00
8.	Niles Twp. " " " " "	10/25/77	25.00
9.	39th Ward " " " " "	11/8/77	25.00
10.	Leyden Twp. " " " " "	1/17/78	100.00
11.	39th Ward " " " " "	4/8/78	25.00
12.	Niles Twp. " " " " "	6/20/78	50.00
13.	40th Ward " " " " "	7/24/78	15.00

79040160292

November 13, 1978

Page Two

II. Evidence

For your reference, we are enclosing copies of all of the expense checks involved, as well as several receipts issued by the respective political organization. In addition, we also enclose a copy of the advertising expense ledger for the three years in question. As the receipts and expense checks indicate, it appears that all of these funds were extended for the purchase of advertisements in local "ad books." We enclose a copy of a typical example of such an advertisement which appeared in an "ad book" entitled "Niles Township Regular Democratic Organization, Annual Dinner Dance, November 19, 1977."

III. Analysis

It would appear that these payments to the organizations listed above constitute "contributions" as defined in the Act. See 2 U.S.C. §431(e). Accordingly, it would appear that the Bank has violated the provisions of Section 441b(a), prohibiting contributions by national banks to political candidates and organizations.

We refer these matters to your attention for the action you deem appropriate.

Enclosures

79040160293

FIRST NATIONAL BANK of LINCOLNWOOD

6401 N. Lincoln Ave.

Lincolnwood, Ill.

583-4800

676-3000



Harold Cohn, President

79040150294

40th WARD REGULAR DEMOCRATIC ORGANIZATION

JOHN C. GEOCARIS, Committeeman

2533 WEST PETERSON AVENUE • CHICAGO, ILLINOIS 60659 • 769-3074

LESTER FOREMAN
President

GILBERT GURBER
Secretary

SOLOMON GUTSTEIN
Alderman

I hereby subscribe for representation in the ANNUAL PROGRAM BOOK.

GOLD PAGE\$200.00

FULL PAGE 100.00

1/2 PAGE 50.00

1/4 PAGE 25.00

1/8 PAGE 15.00

PATRON 10.00

The Agreed Price () Dollars

Name _____

Address _____

Obtained By JACK DECKER 11th pct.

Precinct # _____



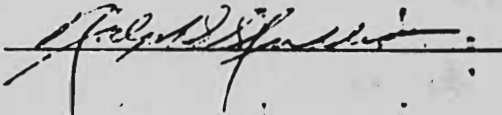
COPY — PLEASE PRINT AS IT WILL APPEAR IN PROGRAM

MAKE ALL CHECKS PAYABLE TO 40th WARD REGULAR DEMOCRATIC ORGANIZATION

*Full
Patron
Al
701-14*

904016022

90401602

 NATIONAL BANK of LINCOLNWOOD LINCOLNWOOD, ILLINOIS		No 25099 <small>70-2325 718</small>	
PAY <u>Twenty-Five and 00/100</u>		<u>7/30</u> <u>1976</u>	
TO THE ORDER OF 40TH Ward Regular Democratic Org 2533 West Peterson Ave. Chicago, Illinois 60659		DOLLARS, \$ 25.00	
		EXPENSE CHECK	
		ACCOUNT  <small>AUTHORIZED SIGNATURE</small>	
			
<small>10719 2325</small>		<small>860 000 718</small>	
		<small>0000002500</small>	

56

PAY TO THE ORDER OF
COMMERCIAL NATIONAL BANK OF CHICAGO
FOR DEPOSIT ONLY
40th Ward Democratic Organization
90-106-0

ANY BANK
CHICAGO

37132

PAY ANY BANK, P.E.O.
COMMERCIAL
NATIONAL BANK
CHICAGO, ILLINOIS
2-429

486-48

ANY BANK
CHICAGO
2-30
578

9040160298

DATE	ITEMS	AMOUNT	DISTRIBUTION
9/3/76	1/4 Page Ad	25.00	701-14

00040160300

\$ _____ Chicago, _____

48th WARD REGULAR DEMOCRATIC ORGANIZATION

5242 SHERIDAN ROAD TELEPHONE 769-3033

MARTIN TUCHOW, Committeeman

You are hereby authorized to publish an advertisement in the Annual Display Ad Book of the 48th Ward Regular Democratic Organization.

☐ HONOR ☐ FULL PAGE ☐ 1/2 PAGE ☒ 1/4 PAGE ☐ SPONSOR ☐ PATRON

GOLD PAGE \$100.00 \$50.00 \$25.00

\$250.00

COPY — PLEASE PRINT OR ATTACH COPY AS IT WILL APPEAR IN PROGRAM

For which I agree to pay the sum of: _____ (\$ _____) Dollars

Name _____ Address _____

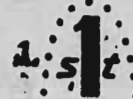
Signed _____ Precinct No. _____

Received Payment ALBERT SOLL Solicited by AL SOLL

70617 Lodge
Cliff 60645

Please Make All Checks Payable to:
48th Ward Regular Democratic Organization
No Paid Solicitors

2904016039d

 NATIONAL BANK of LINCOLNWOOD LINCOLNWOOD, ILLINOIS		No 25247 <small>70-2325 719</small>	
		Sept 3 1976	
PAY <u>Twenty Five and 00/100.</u>		DOLLARS \$ <u>25.00</u>	
TO THE ORDER OF 48th Ward Regular Democratic Organization, 5242 Sheridan Road Chicago, Ill. 60640		EXPENSE CHECK ACCOUNT <u>[Signature]</u> AUTHORIZED SIGNATURE <u>[Signature]</u>	
		⑈0000002500⑈	

46

PAY TO THE ORDER OF
NATIONAL BANK OF ALBANY PARK
IN CHICAGO
48TH WARD REGULAR
DEMOCRATIC ORGANIZATION
0 5443 7

NATIONAL BANK
CHICAGO

SEP 24 1932

51

2-4
NATIONAL BANK OF
ALBANY PARK
CHICAGO, ILLINOIS
2-450

003091040630

1 NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No. 25598 70-2928
718

October 11, 1976

PAY Twenty Five and 00/100 DOLLARS \$ 25.00

TO THE ORDER OF 39th Ward Regular Democratic Organisation

ACCOUNT *J. E. Smith*
AUTHORIZED SIGNATURE

NOT NEGOTIABLE

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
10/11/76	Ord Half Page Ad	25.00	701-14

**PROGRAM
ADVERTISING CONTRACT**

**39th WARD REGULAR
DEMOCRATIC ORGANIZATION
ALDERMAN ANTHONY C. LAURINO
WARD COMMITTEEMAN
Phone: PE 6-5594**

You are hereby authorized to insert in your Program advertisement to cover space of _____ page at \$ _____ payable before or upon demand following publication.

It is mutually understood and agreed that the foregoing contract expresses its full consideration and that verbal agreements with solicitors or agents will not be allowed.

Advertiser _____

Contract Signed by _____

Business Address _____

Representative _____

Date _____

Make All Checks Payable To
39th Ward Regular Democratic Organization

— RATES — 701-14

GOLD PAGE	\$100.00
FULL PAGE	50.00
ONE HALF PAGE	25.00
ONE QUARTER PAGE	15.00
ONE FIFTH PAGE	10.00

A copy of our report filed with the county clerk is available for purchase from the Cook County Clerk, 118 North Clark Street, Chicago, Illinois.

COPY

Robert Cohen
5707 N. Campbell
IL
60654

**39th WARD REGULAR
DEMOCRATIC ORGANIZATION
ALDERMAN ANTHONY C. LAURINO
Ward Committeeman
PHONE: PE 6-5594**

Date _____

RECEIVED OF _____

\$ _____

Representative _____

2904016030

NATIONAL BANK of LINCOLNWOOD LINCOLNWOOD, ILLINOIS		No 25598		70-2325 719
		October 11		19 76
PAY <u>Twenty Five and 00/100.</u>		DOLLARS \$		25.00
TO THE ORDER OF 39th Ward Regular Democratic Organization		EXPENSE CHECK		
		ACCOUNT		<i>[Signature]</i>
				<i>[Signature]</i>
				AUTHORIZED SIGNATURE
⑆0719⑉2325⑆		860⑉000⑉7⑈		⑆0000002500⑆

0309104067

ANY BANK
CHICAGO

12-40
ANY BANK
NATIONAL BANK OF
ALBANY PARK
CHICAGO, ILLINOIS
2-40

CC12076 19 15908

1160

1111
PAY TO THE ORDER OF
NATIONAL BANK OF ALBANY PARK
IN CHICAGO
FOR DEPOSIT ONLY
33th WARD
REGULAR DEPOSIT
0-6079-8

**TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-990-6**

File 0710-0030-1
FEB 1968 CHICAGO

1677

RIC
JUL
KOKLE
GJ
J-1494

AD BOOK CONTAINED BY DEMOCRATIC PA

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

№ 27133

70-2325
719

May 6

.1977

PAY Twenty five and 00/100----

DOLLARS. \$ 25.00 ;

TO Niles Township Regular Democratic Org.
THE Sutker Ad Book Committee
ORDER OF -4654 Oakton Street
OF Skokie, Illinois

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

1:07 19m 232512

[illegible]

0000002500

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

№ 27133

70-2328
719

May 6

. 1955

PAY Twenty five and 00/100

DOLLARS \$25.00

TO
THE
ORDER
OF

Niles Township Regular Democratic Org.
Suther Ad Book Committee
4654 Oakton Street
Skokie, Illinois

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
5-6-77	Advertising expense	25.00	701-14

OFFICIAL NATIONAL BANK OF CHICAGO
FOR DEPOSIT ONLY
40th Ward Democratic Organization
90-1660

0710-00308
1KB CHICAGO

1977 JUN 9

PAB 0710-0030-1
FRB CHICAGO CHICAGO

1977 JUN 9

0710-0030-1

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27274

70-2325
719

May 28

1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF 40th Ward Regular Democratic Org.
2533 W. Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK
ACCOUNT AUTHORIZED SIGNATURE
0719 2325 860 000 7 0000002500

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27274

70-2325
719

May 28

1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF 40th Ward Regular Democratic Org.
2533 W. Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK
ACCOUNT AUTHORIZED SIGNATURE
NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
5/28/77	Advertising expense	25.00	701-14

7 9 0 4 0 1 6 0 3 0

0030-1
1977

1977

6

1

2

8

0030-1
CHICAGO

1977

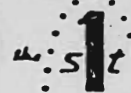
NOV

8

1977

FOR DEPOSIT ONLY IN ACCOUNT OF
CAPT. R. SUTKER
TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-990-6
0710 CHIC

ONAL
SKOKIE
UNOS
70-1494



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27826

70-2327
719

August 9, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE
ORDER
OF

Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

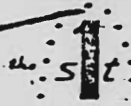
EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

0719-23256 860-000-71

0000002500



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27826

70-2327
719

August 9, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE
ORDER
OF

Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
8/9/77	Advertising expense	25.00	701-14

RECEIVED
FEDERAL RESERVE BANK
40th Ward L. Murphy Organization
CHICAGO, ILL. 60611
SEP 11 1977

0-900306

PAB 0710-00306

FAB 0710-00306

87373
JIMMY GELCHER'S
AND
BEN E. PALMER
FROM
NELS / E. WERNER

FAB 0710-00306
FAB CHICAGO

SEP

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28017

70-2325
719

September 3, 1977

PAY One Hundred Dollars and /100

DOLLARS \$100.00

TO
THE
ORDER
OF

40th Ward Reg. Demo. Org.

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

0719-2325 860-000-7 0000010000

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28017

70-2325
719

September 3, 1977

PAY One Hundred Dollars and /100

DOLLARS \$100.00

TO
THE
ORDER
OF

40th Ward Reg. Demo. Org.

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
9/3/77	AD	100.00	701-14

7 9 0 4 0 1 5 0 3

FOR DEPOSIT ONLY IN ACCOUNT OF
CALVIN R. SUTKER
TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-990-6

0710-0030-1
CHICAGO

1977

8

128

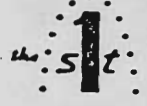
0710-0030-1
CHICAGO

1977

8 NOV

CNAL
SKOKIE
ILLINOIS
70-1494

PA 1

**NATIONAL BANK of LINCOLNWOOD**
LINCOLNWOOD, ILLINOIS

TO THE ORDER OF

Niles Township Regular Democratic Org.

PAY Twenty five and 00/100

DOLLARS \$25.00

EXPENSE CHECK

ACCOUNT [Signature]
AUTHORIZED SIGNATURE

[Signature]

NOT NEGOTIABLE

No. 28388

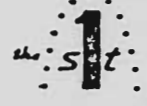
October 25, 1977

70-232 719

10719 2325

860 000 7

0000002500

**NATIONAL BANK of LINCOLNWOOD**
LINCOLNWOOD, ILLINOIS

TO THE ORDER OF

Niles Township Regular Democratic Org.

PAY Twenty five and 00/100

DOLLARS \$25.00

EXPENSE CHECK

ACCOUNT [Signature]
AUTHORIZED SIGNATURE

[Signature]

NOT NEGOTIABLE

No. 28388

October 25, 1977

70-232 719

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
10/25/77	Advertising expense 1/2 page ad with our check # 27826	25.00	701-14

709 0401603

CHICAGO

1977

30 DEC

30 DEC

PAC 0710-0030-1
FRB CHICAGO

1977

30 DEC

PAY TO THE ORDER OF
NATIONAL BANK OF ALBANY PARK
IN CHICAGO
FOR DEPOSIT ONLY
39th WARD REGULAR DEMOCRATIC ORG.
0-6079-8

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28520

70-2325
719

November 8, 1977

PAY Twenty Five and 00/100

DOLLARS \$25.00

TO THE ORDER OF

39th Ward Regular Democratic Organization
c/o Al Cohen
5707 North Campbell
Chicago, Illinois 60659

ACCOUNT

EXPENSE CHECK

AUTHORIZED SIGNATURE

10719 2325 860 000 7

000000 2500

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28520

70-2325
719

November 8, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF

39th Ward Regular Democratic Organization
c/o Al Cohen
5707 North Campbell
Chicago, Illinois 60659

ACCOUNT

EXPENSE CHECK

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
1/24/77	Advertising - half page	25.00	701-14

PAY TO THE ORDER OF
MAYWOOD-PROVISO STATE BANK
 FOR DEPOSIT ONLY
 LEYDEN TOWNSHIP
 REGULAR DEMOCRATIC ORGANIZATION
 SPECIAL ACCOUNT
 51-901-4

PAY ANY BANK, P.E.G.
 70-2252 70-2252
MAYWOOD-PROVISO
STATE BANK
 MAYWOOD, ILLINOIS

1354

001 012878

NATIONAL BANK of LINCOLNWOOD
 LINCOLNWOOD, ILLINOIS

No 29012 70-2325 719

January 17, 1978

PAY One Hundred Dollars and no/100

DOLLARS \$ 100.00

TO THE ORDER OF
 Leyden Township Regular
 Democratic Organization
 (For Annual Dinner Dance Ad)

EXPENSE CHECK
 ACCOUNT AUTHORIZED SIGNATURE
[Signature]

⑆0719⑈2325⑈ 850⑈000⑈7⑈ ⑈0000010000

NATIONAL BANK of LINCOLNWOOD
 LINCOLNWOOD, ILLINOIS

No 29012 70-2325 719

January 17, 1978

PAY One Hundred Dollars and no/100

DOLLARS \$ 100.00

TO THE ORDER OF
 Leyden Township Regular
 Democratic Organization

EXPENSE CHECK
 ACCOUNT AUTHORIZED SIGNATURE
[Signature]
NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
 LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
 IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
1/17/78	Annual Dinner Dance -M	100.00	701-14

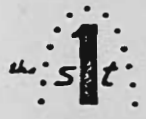
7 2 0 4 0 1 6 0 3 1 4

33rd WARD
REGULAR
DEMOCRATIC ORG.
06079

0710 0030
CHICAGO

0710-0030-1
CHICAGO

ANY BANK
ANY BANK AND TRUST
ANY BANK AND TRUST
CHICAGO, ILLINOIS



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29672

April 8, 1978

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE
ORDER
OF

39th Ward Regular Democratic Organization

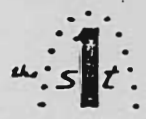
EXPENSE CHECK

ACCOUNT

Polly Howard
AUTHORIZED SIGNATURE

[Signature]

⑆0719⑉2325⑆ ⑆80⑉000⑉7⑈ ⑆00000025⑆



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29672

April 8, 1978

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE
ORDER
OF

39th Ward Regular Democratic Organization

EXPENSE CHECK

ACCOUNT

Polly Howard
AUTHORIZED SIGNATURE

NOT NEGOTIABLE

[Signature]

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
4/8/78	Advertising	25.00	701-34

FOR DEPOSIT ONLY IN ACCOUNT
OF
CALVIN R. SUTKER
TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-990-6

7 9 0 4 0 1 6 0 3 1 8

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 30284

70-2325
719

June 20

1978

PAY Fifty and 00/100

DOLLARS \$50.00

TO
THE
ORDER
OF

Niles Township Regular Democratic Organization
c/o H. Leavitt
3337 Columbia
Lincolnwood, Illinois 60645

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

10719 2325

860 000 719

0000005000

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 30284

70-2325
719

June 20

1978

Y Fifty and 00/100

50 DOLLARS \$50.00

Niles Township Regular Democratic Organization
c/o H. Leavitt
3337 Columbia
Lincolnwood, Illinois 60645

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

1ST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
6/20/78	1/2 page ad	50.00	701-11

ACTUAL INITIAL BANK OF LINCOLNWOOD
FOR DEPOSIT ONLY
In Ward Democratic Organization
90-166-0

7 0 0 4 0 1 6 0 3

10 0030 1
CHICAGO

MS-778

PAY ANY BR. OR BR. P.L.D.
COMMERCIAL
NATIONAL BANK
CHICAGO, ILL. 60601
2-429 2-429

3333 90329

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 30518 70-2325 719

July 24, 1978

PAY Fifteen and 00/100

DOLLARS \$15.00

TO THE
ORDER
OF

40th Ward Regular Democratic Organization
2533 West Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

10719 2325

FIRST NATIONAL BANK
LINCOLNWOOD ILL.
70-2325

[Signature]
[Signature]

0000001500

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 30518 70-2325 719

July 24, 1978

PAY Fifteen and 00/100

DOLLARS \$15.00

TO THE
ORDER
OF

40th Ward Regular Democratic Organization
2533 West Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
24/78	Advertising	15.00	701-14



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harold Cohn
President
First National Bank of Lincolnwood
6401 N. Lincoln Avenue
Lincolnwood, Illinois

RE: MUR 1012

Dear Mr. Cohn:

This letter is to notify you that the Federal Election Commission has received information from the Comptroller of the Currency which indicates that certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act") may have been committed. We have numbered this matter MUR 1012. The Commission has reason to believe that the matters alleged state a violation of 2 U.S.C. §441b. Specifically, it appears that the First National Bank of Lincolnwood made several contributions/expenditures to various local Democratic organizations in Illinois between July, 1976 and July, 1978 totalling \$490.00.

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 Duane Brown, the attorney assigned to this matter, at (202) 523-4057.

Harold Cohn
Page 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 wish to be represented by counsel, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

7949160318

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

First National Bank)
of Lincolnwood, Illinois)

PRE-MUR 33

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify, that on August 1, 1979, the Commission approved by a vote of 5-0 , the recommendation contained in the General Counsel's Memorandum dated 7-27-79, that the above-named matter be made into a MUR.

Voting for this determination were Commissioners Friedersdorf, Aikens, Tiernan, McGarry and Harris.

Attest:

Date

8/1/79

Lana L. Stafford
for Marjorie W. Emmons
Secretary to the Commission

Received in the Office of the Commission Secretary:
Circulated on 48 hour vote basis:

7-27-79, 4:20
7-27-79, 11:00

79040160319

July 27, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: Pre MUR 33

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

Thank you.

79040160320



FEDERAL ELECTION COMMISSION

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 JUL 27 P 4: 20

MEMORANDUM

July 27, 1979

TO: The Commission

FROM: William C. Oldaker
General Counsel

RE: Pre-MUR 33

W.C.O.

BACKGROUND

As a result of information discovered during the course of a recent examination of the First National Bank of Lincolnwood, Illinois, the Senior Deputy Comptroller for Bank Supervision referred this matter to the Commission alleging possible violations of the Act.

FACTS

The prospective respondent bank made thirteen contributions to various local Democratic organizations in Illinois between July, 1976 and July, 1978 totalling \$490.00. Specifically, expenditures were made for the purchase of advertising space in local political "ad books".

ANALYSIS

Under 2 U.S.C. §441b of our Act, national banks are prohibited from making any "contribution or expenditure" in connection with any election to any political office. 2 U.S.C. §441b(b)(2) provides that:

". . . [T]he term 'contribution or expenditure' shall include any direct or indirect payment, distribution, loan, advance, deposit, or gift of money. . . or anything of value . . . to any candidate, campaign committee, or political committee or organization in connection with any election . . . ".

It appears that the expenditures by the First National Bank of Lincolnwood constitute a "contribution or expenditure" in



79040160321

connection with an election and therefore is in violation of
2 U.S.C. §441b of our Act.

RECOMMENDATION

Authorize that this matter be made into a MUR.

Attachment

Referral

79040160322

RECEIVED
FEDERAL ELECTION
COMMISSION

Comptroller of the Currency
Administrator of National Banks

79 JUL 18 PM 2:55

Washington, D.C. 20219

July 16, 1979

903155

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

Dear Mr. Oldaker:

During the course of the most recent examination of the First National Bank, Lincolnwood, Illinois, commencing September 17, 1978, by the Comptroller's Regional Office in Chicago, several possible violations of 2 U.S.C. 441b were revealed. Specifically, thirteen political contributions made between July 30, 1976 and July 24, 1978 to various Democratic Organizations were disclosed, in the aggregate amount of \$490. All these funds were apparently extended for the purchase of advertisements in local "ad books."

In light of the Federal Election Commission's jurisdiction over potential violations of 2 U.S.C. 441b, we believe that this information should be referred to you for your independent investigation and review. If we can be of any further assistance please contact the Enforcement and Compliance Division of the Office of the Comptroller of the Currency at 447-1983.

Sincerely,

Paul M. Homan

Paul M. Homan
Senior Deputy Comptroller for Bank Supervision

Attachments

79 JUL 18 PM 4:43

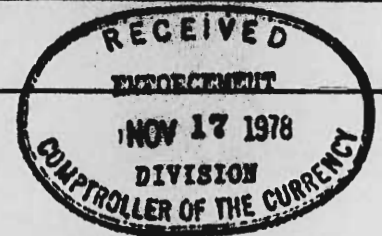
RECEIVED
GENERAL COUNSEL
OFFICE OF THE
COMPTROLLER OF THE CURRENCY

79040150323

MEMORANDUM

Comptroller of the Currency
Administrator of National Banks

Seventh National Bank Region
Sears Tower, Suite 5750
233 South Wacker Drive
Chicago, Illinois 60606



To: Robert B. Serino, Director
Enforcement & Compliance Division

From: John P. Sherry, Regional Counsel

Date: November 13, 1978

Subject: First National Bank
Lincolnwood, Illinois

JP Sherry

I. Summary

During the course of the most recent examination of referenced Bank, commencing September 17, 1978, several possible violations of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. §413, et seq.), were revealed. Possible contributions to political committees were reflected in the advertising expense records of the Bank, as follows:

	<u>Recipients</u>	<u>Date</u>	<u>Amount</u>
1.	40th Ward Regular Democratic Organization	7/30/76	\$ 25.00
2.	48th Ward " " " " "	9/3/76	25.00
3.	39th Ward " " " " "	10/11/76	25.00
4.	Niles Twp. " " " " "	5/6/77	25.00
5.	40th Ward " " " " "	5/28/77	25.00
6.	Niles Twp. " " " " "	8/9/77	25.00
7.	40th Ward " " " " "	9/3/77	100.00
8.	Niles Twp. " " " " "	10/25/77	25.00
9.	39th Ward " " " " "	11/8/77	25.00
10.	Leyden Twp. " " " " "	1/17/78	100.00
11.	39th Ward " " " " "	4/8/78	25.00
12.	Niles Twp. " " " " "	6/20/78	50.00
13.	40th Ward " " " " "	7/24/78	15.00

79040160324

November 13, 1978

Page Two

II. Evidence

For your reference, we are enclosing copies of all of the expense checks involved, as well as several receipts issued by the respective political organization. In addition, we also enclose a copy of the advertising expense ledger for the three years in question. As the receipts and expense checks indicate, it appears that all of these funds were extended for the purchase of advertisements in local "ad books." We enclose a copy of a typical example of such an advertisement which appeared in an "ad book" entitled "Niles Township Regular Democratic Organization, Annual Dinner Dance, November 19, 1977."

III. Analysis

It would appear that these payments to the organizations listed above constitute "contributions" as defined in the Act. See 2 U.S.C. §431(e). Accordingly, it would appear that the Bank has violated the provisions of Section 441b(a), prohibiting contributions by national banks to political candidates and organizations.

We refer these matters to your attention for the action you deem appropriate.

Enclosures

79040160325

**FIRST NATIONAL BANK
of LINCOLNWOOD**

6401 N. Lincoln Ave.

Lincolnwood, Ill.

583-4800

676-3000



Harold Cohn, President

79040160326

CONFIDENTIAL MAILING LABEL UP
FOR DEPOSIT ONLY
10th Ward Democratic Organization
90-166-0

333 50329

PAY AMT BR ON HRP P.L.D.
COMMERCIAL
NATIONAL BANK
CHICAGO, ILLINOIS
2-429 2-429

MS-778

№ 30518

70-2328
719

July 24, 1978

PAY Fifteen and 00/100

DOLLARS \$15.00

TO
THE
ORDER
OF

40th Ward Regular Democratic Organization
2533 West Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

1:07 19m 23 25

3. 5000 75

0000001500.

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

№ 30518

70-2325
719

July 24, 1978

PAY Fifteen and 00/100

DOLLARS \$15.00

TO
THE
ORDER
OF

40th Ward Regular Democratic Organization
2533 West Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DATE	ITEMS	AMOUNT	DISTRIBUTION
24/78	Advertising	15.00	701-14

FOR DEPOSIT ONLY IN ACCOUNT OF
 CALVIN R. SUTKER
 TOWNSHIP COMMITTEEMAN
 NILES TOWNSHIP
 Regular Democratic Organization
 Account #61-990-6

7 9 0 4 0 1 6 0 3 2 8

NATIONAL BANK of LINCOLNWOOD
 LINCOLNWOOD, ILLINOIS

No 90284

70-2325
 719

0 1 1 1 0

June 20

1978

PAY Fifty and 00/100

DOLLARS \$50.00

TO
 THE
 ORDER
 OF

Niles Township Regular Democratic Organization
 c/o H. Leavitt
 3337 Columbia
 Lincolnwood, Illinois 60645

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

10719 2325

860 000 719

0000005000

NATIONAL BANK of LINCOLNWOOD
 LINCOLNWOOD, ILLINOIS

No 90284

70-2325
 719

June 20

1978

Y Fifty and 00/100

50 DOLLARS \$50.00

Niles Township Regular Democratic Organization
 c/o H. Leavitt
 3337 Columbia
 Lincolnwood, Illinois 60645

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
 IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

1ST NATIONAL BANK OF LINCOLNWOOD
 LINCOLNWOOD, ILLINOIS

DATE	ITEMS	AMOUNT	DISTRIBUTION
6/78	1/2 page ad	50.00	701-14

7 9 0 1 0 1 3 0 3 2 9

IN CHICAGO
FOR DEMOCRATIC
39th WARD REGULAR DEMOCRATIC ORG.
0-6079

0710 0030

0710-0030-1
CHICAGO

ANY BANK
ANY BANK AND TRUST
ANY BANK AND TRUST
CHICAGO, ILLINOIS

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29672 ⁷⁰⁻²/₇₁

April 8, 19

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE
ORDER
OF

39th Ward Regular Democratic Organization

EXPENSE CHECK

ACCOUNT

Dolly Howard
AUTHORIZED SIGNATURE

[Signature]

10719 2325

800 000 7

00000025

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29672 ⁷⁰⁻²/₇₁

April 8, 19

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE
ORDER
OF

39th Ward Regular Democratic Organization

EXPENSE CHECK

ACCOUNT

Dolly Howard
AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
4/8/78	Advertising	25.00	701-34

7 9 0 4 0 1 6 0 3 3 0

PAY TO THE ORDER OF
MAYWOOD-PROVISO STATE BANK
FOR DEPOSIT ONLY
LEYDEN TOWNSHIP
REGULAR DEMOCRATIC ORGANIZATION
SPECIAL ACCOUNT
51-9014

10/10/80-1
CHICAGO 30
1881

PAY ANY BANK, P.E.G.
70-2252 70-2252
MAYWOOD-PROVISO
STATE BANK
MAYWOOD, ILLINOIS

1354

001 082878

1978

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29012 70-2252
718

January 17, 1978

PAY One Hundred Dollars and no/100

DOLLARS \$ 100.00

TO THE ORDER OF
Leyden Township Regular
Democratic Organization
(For Annual Dinner Dance Ad)

EXPENSE CHECK
ACCOUNT *[Signature]*
AUTHORIZED SIGNATURE

0719 2325 850 000 7 000000 10000

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29012 70-2252
718

January 17, 1978

PAY One Hundred Dollars and no/100

DOLLARS \$ 100.00

TO THE ORDER OF
Leyden Township Regular
Democratic Organization

EXPENSE CHECK
ACCOUNT *[Signature]*
AUTHORIZED SIGNATURE
NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
1/17/78	Annual Dinner Dance -Ad	100.00	701-14

7 9 0 4 0 1 6 0 3 3 1

CHICAGO

1977

30 DEC

NATIONAL BANK OF ALBANY PARK
CHICAGO, ILLINOISFAC 0710-0030-1
PRB CHICAGO

1977

30 DEC

PAY TO THE ORDER OF
NATIONAL BANK OF ALBANY PARK
IN CHICAGO
FOR DEPOSIT ONLY
39th WARD REGULAR DEMOCRATIC ORG.
0-6079-8NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOISNo 28520 70-2325
719

November 8, 1977

PAY Twenty Five and 00/100

DOLLARS \$25.00

TO
THE
ORDER
OF39th Ward Regular Democratic Organization
c/o Al Cohen
5707 North Campbell
Chicago, Illinois 60659

ACCOUNT

EXPENSE CHECK

AUTHORIZED SIGNATURE

⑆0719⑉2325⑆ 860⑉000⑉7⑈

⑆0000002500⑆

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOISNo 28520 70-2325
719

November 8, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO
THE
ORDER
OF39th Ward Regular Democratic Organization
c/o Al Cohen
5707 North Campbell
Chicago, Illinois 60659

ACCOUNT

EXPENSE CHECK

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOISTHE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
1/24/77	Advertising - half page	25.00	701-14

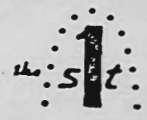
7 9 0 4 0 1 5 0 3 3 2

FOR DEPOSIT ONLY IN ACCOUNT OF
CALVIN R. SUTKER
TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-990-6

0710-0030-1
CHICAGO 1 1977 8

0710-0030-1
CHICAGO 1 1977 8

ONAL
SKOKIE
70-1494



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No. 28388

70-232
719

October 25, 1977

PAY Twenty five and 00/100

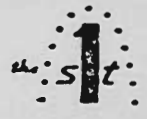
DOLLARS \$25.00

EXPENSE CHECK

TO THE ORDER OF Niles Township Regular Democratic Org.

ACCOUNT *[Signature]*
AUTHORIZED SIGNATURE

00719 2325 660 000 0000002500



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No. 28388

70-232
719

October 25, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

EXPENSE CHECK

TO THE ORDER OF Niles Township Regular Democratic Org.

ACCOUNT *[Signature]*
AUTHORIZED SIGNATURE
NOT NEGOTIABLE

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
10/25/77	Advertising expense 1/2 page ad with our check # 27826	25.00	701-14

1977
40th Ward Reg. Demo. Organization
PAB 0710-0030
FRB CHICAGO

7 9 0 1 6 0 3 3 3

8737
JULY 1977
JULY 1977
JULY 1977

FROM
NIELS / E. WERNER
BEN E. PALMER
FRB CHICAGO
PAB 0710-0030
FRB CHICAGO

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28017 70-2325 719

September 3, 1977

PAY One Hundred Dollars and /100 DOLLARS \$100.00

TO THE ORDER OF 40th Ward Reg. Demo. Org.

EXPENSE CHECK
ACCOUNT AUTHORIZED SIGNATURE

0719-2325 860-000-70 0000010000

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28017 70-2325 719

September 3, 1977

PAY One Hundred Dollars and /100 DOLLARS \$100.00

TO THE ORDER OF 40th Ward Reg. Demo. Org.

EXPENSE CHECK
ACCOUNT AUTHORIZED SIGNATURE
NOT NEGOTIABLE

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS
DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
9/3/77	AD	100.00	701-14

7 9 0 4 0 1 6 0 3 3 4

0030-1
100

1977

8

0030-1
CHICAGO

161

8 NOV

ONAL
SKOKIE
UNOS
70-1494

0710
CHK
FOR DEPOSIT ONLY IN ACCOUNT OF
CABELE R. SUTKER
TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-9906

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27826

70-2325
719

August 9, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

EXPENSE CHECK

TO THE ORDER OF
Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

ACCOUNT

AUTHORIZED SIGNATURE

0719-2325 860-000-7

0000002500

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27826

70-2325
719

August 9, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

EXPENSE CHECK

TO THE ORDER OF
Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

ACCOUNT

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO REFUND DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
8/9/77	Advertising expense	25.00	701-14

7 9 0 4 0 1 5 0 3 3 5

CONFIDENTIAL NATIONAL BANK OF CHICAGO
FOR DEPOSIT ONLY
40th Ward Democratic Organization
90-166-0

0710-0030-1
1KB CHICAGO

1977

JUN 9

PAB

0710-0030-1
FRB CHICAGO

0710-0030-1
CHICAGO

1977

JUN 9

FRB

5 7 6 9 8

1 NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27274

70-2325
719

May 28

1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF 40th Ward Regular Democratic Org.
2533 W. Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

0719 2325

860 000 719

0000002500

1 NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27274

70-2325
719

May 28

1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF 40th Ward Regular Democratic Org.
2533 W. Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK

ACCOUNT

AUTHORIZED SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

IN FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
5/28/77	Advertising expense	25.00	701-14

7 9 0 4 0 1 5 0 3 3 6

TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-990-6
3332 93543

0710-0030-1
FEB CHICAGO

MAY 16 77

SKOKIE
ILLINOIS
3-1494

Ad Book CONTINUED By Democratic Pa



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27133

70-2325
719

May 6, 1977

PAY Twenty five and 00/100----

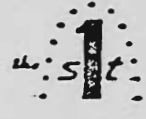
DOLLARS \$25.00

TO THE
ORDER
OF

Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

EXPENSE CHECK
ACCOUNT *[Signature]*
AUTHORIZED SIGNATURE

0719-2325; 0000002500



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27133

70-2325
719

May 6, 1977

PAY Twenty five and 00/100----

DOLLARS \$25.00

TO THE
ORDER
OF

Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

EXPENSE CHECK
ACCOUNT *[Signature]*
AUTHORIZED SIGNATURE
NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
5-6-77	Advertising expense	25.00	701-14

78040160337

11113
PAY TO THE ORDER OF
NATIONAL BANK OF CHICAGO
FOR DEPOSIT ONLY
33rd WARD REGULAR DEPOSIT
0-6679-8

223

00110

OCT 20 1915 908

12-446
ANY BANK - P.E.S.
NATIONAL BANK OF
ALBANY PARK
CHICAGO, ILLINOIS
2-446

ANY BANK
CHICAGO

NATIONAL BANK OF LINCOLNWOOD LINCOLNWOOD, ILLINOIS		TO THE ORDER OF 39th Ward Regular Democratic Organization	
PAY Twenty Five and 00/100		:00719 2325	
No 25598		BANK OF LINCOLNWOOD ILL 702325	
October 11 1976		EXPENSE CHECK	
DOLLARS \$ 25.00		ACCOUNT	
AUTHORIZED SIGNATURE		850 0000 71	
70-2325 719		00000002500	

78040160338

PROGRAM ADVERTISING CONTRACT

39th WARD REGULAR
DEMOCRATIC ORGANIZATION
ALDERMAN ANTHONY C. LAURINO
WARD COMMITTEEMAN
Phone: PE 6-5594

You are hereby authorized to insert in your Program
advertisement to cover space of _____ page
at \$ _____ payable before or upon demand fol-
lowing publication.
It is mutually understood and agreed that the fore-
going contract expresses its full consideration and that
verbal agreements with solicitors or agents will not be
allowed.

Advertiser _____
Contract Signed by _____
Business Address _____
Representative _____
Date _____
Make All Checks Payable To
39th Ward Regular Democratic Organization

RATES — 7-01-17

GOLD PAGE	\$100.00
FULL PAGE	50.00
ONE HALF PAGE	25.00
ONE QUARTER PAGE	15.00
ONE FIFTH PAGE	10.00

A copy of our report filed with the county clerk is available
for purchase from the Cook County Clerk, 118 North Clark
Street, Chicago, Illinois.

COPY

*Willis Cohen
5707 N. Campbell
60654*

39th WARD REGULAR
DEMOCRATIC ORGANIZATION
ALDERMAN ANTHONY C. LAURINO
WARD COMMITTEEMAN
PHONE: PE 6-5594

RECEIVED OF _____
Date _____
Representative _____

78040160339

72040160340

DATE	ITEMS	AMOUNT	DISTRIBUTION
10/11/76		25.00	701-14
10/11/76 and Half Page Ad			

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

THE FIRST NATIONAL BANK OF LINCOLNWOOD, ILLINOIS

TO: 39th Ward Regular Democratic Organization

PAY: Twenty Five and 00/100

EXPENSE CHECK

ACCOUNT

NOT NEGOTIABLE

DATE: 10/11/76

DOLLARS \$ 25.00

70-2325 No. 25598

NATIONAL BANK OF LINCOLNWOOD, ILLINOIS

46

392

20

0947117-7

23

5291478 13 17200

5 1
2-40
NATIONAL BANK OF
LAKEVIEW PARK
IN CHICAGO, ILLINOIS
2-494

9

NATIONAL BANK OF LINCOLNWOOD, ILLINOIS		LINCOLNWOOD, ILL.		70-2325	
PAY Twenty Five and 00/100		FIRST NATIONAL		70-2325	
TO 48th Ward Regular Democratic		LINCOLNWOOD, ILL.		70-2325	
ORDER THE 5242 Sheridan Road		LINCOLNWOOD, ILL.		70-2325	
OF Chicago, Ill. 60640		LINCOLNWOOD, ILL.		70-2325	
ACCOUNT		EXPENSE CHECK		DOLLARS \$ 25.00	
No. 25247		Sept 3 1976		70-2325	
70-2325		70-2325		70-2325	

48th WARD REGULAR DEMOCRATIC ORGANIZATION

TELEPHONE 769-3033

MARTIN TUCHOW, Committeeman

You are hereby authorized to publish an advertisement in the Annual Display Ad Book of the 48th Ward Regular Democratic Organization.

☐ HONOR ☐ FULL PAGE ☐ 1/2 PAGE ☒ 1/4 PAGE ☐ SPONSOR ☐ PATRON

\$250.00

GOLD PAGE

\$100.00

\$50.00

\$25.00

COPY — PLEASE PRINT OR ATTACH COPY AS IT WILL APPEAR IN PROGRAM

For which I agree to pay the sum of: (\$) Dollars

Name _____ Address _____

Signed _____ Precinct No. _____

Received Payment _____

ALBERT SOLC

Solicited by *AL SOLC*

Please Make All Checks Payable to:
48th Ward Regular Democratic Organization
No Paid Solicitors

576

70617 Kelly 60645

78040150343

78040160344

NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

57

PAY Twenty Five and 00/100

TO 48th Ward Regular Democratic Organization
ORDER 3242 Sheridan Road
Chicago, Ill. 60640

NOT NEGOTIABLE

EXPENSE CHECK

ACCOUNT

DOLLARS \$25.00

Sept 3 1976

No 25247

70-2325 719

DETACH AND RETAIN THIS STATEMENT THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.			
DATE	ITEMS	AMOUNT	DISTRIBUTION
9/3/76	4 Page Ad	25.00	701-24

7 8 0 1 0 1 6 0 3 4 5

30

PAY TO THE ORDER OF
COMMERCIAL NATIONAL BANK OF CHICAGO
FOR DEPOSIT ONLY
40th Ward Democratic Organization
90-186-0

CHICAGO

37138

PAY ANY BANK, P.E.O.
COMMERCIAL
NATIONAL BANK
CHICAGO, ILLINOIS
2-429 2-429

APR 4 1964

578

230

CHICAGO 230

NATIONAL BANK OF LINCOLNWOOD LINCOLNWOOD, ILLINOIS	PAY Twenty-five and 00/100	TO 40TH Ward Regular Democratic 2533 West Peterson Ave. Chicago, Illinois 60659	FIRST NATIONAL BANK LINCOLNWOOD ILL.	EXPENSE CHECK \$ 25.00	7/30 1976	No 25099 70-2325 719
---	----------------------------	---	---	---------------------------	-----------	-------------------------

40th WARD REGULAR DEMOCRATIC ORGANIZATION

JOHN C. GEOCARIS, Committeeman
 2523 WEST PETERSON AVENUE • CHICAGO, ILLINOIS 60659 • 769-3074
 LESTER FOREMAN President
 GILBERT GURBER Secretary
 SOLOMON GUTSTEIN Alderman

I hereby subscribe for representation in the ANNUAL PROGRAM BOOK.

COPY — PLEASE PRINT AS IT WILL APPEAR IN PROGRAM

GOLD PAGE	\$200.00
FULL PAGE	100.00
1/2 PAGE	50.00
1/4 PAGE	25.00
1/8 PAGE	15.00
PATRON	10.00

The Agreed Price () Dollars

701-14
William
St

Name _____
 Address _____
 Obtained By TACR Decker 11th p.t.
 Precinct # _____

MAKE ALL CHECKS PAYABLE TO 40th WARD REGULAR DEMOCRATIC ORGANIZATION

7 0 4 0 1 6 0 3 4 7

7 8 1 0 1 6 0 3 4 9

1st NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No. 25099

7/30/76 19.76

PAY Twenty-Five and 00/100 DOLLARS \$ 25.00

TO THE ORDER OF 40TH Ward Regular Democratic Org
2533 West Peterson Ave
Chicago, Illinois 60659

EXPENSE CHECK

ACCOUNT [Signature]
AUTHORIZED SIGNATURE

NOT NEGOTIABLE

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
7/30/76	one-fourth page ad in book	25.00	701-14



RECEIVED
FEDERAL ELECTION
COMMISSION

Comptroller of the Currency
Administrator of National Banks

79 JUL 18 PM 2:55

Washington, D.C. 20219

July 16, 1979

903155

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

Dear Mr. Oldaker:

During the course of the most recent examination of the First National Bank, Lincolnwood, Illinois, commencing September 17, 1978, by the Comptroller's Regional Office in Chicago, several possible violations of 2 U.S.C. 441b were revealed. Specifically, thirteen political contributions made between July 30, 1976 and July 24, 1978 to various Democratic Organizations were disclosed, in the aggregate amount of \$490. All these funds were apparently extended for the purchase of advertisements in local "ad books."

In light of the Federal Election Commission's jurisdiction over potential violations of 2 U.S.C. 441b, we believe that this information should be referred to you for your independent investigation and review. If we can be of any further assistance please contact the Enforcement and Compliance Division of the Office of the Comptroller of the Currency at 447-1983.

Sincerely,

Paul M. Homan

Paul M. Homan
Senior Deputy Comptroller for Bank Supervision

Attachments

79 JUL 18 PM 4:43

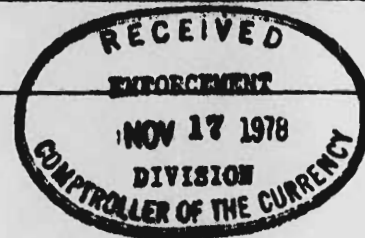
RECEIVED
GENERAL COUNSEL

79040160349

MEMORANDUM

Comptroller of the Currency
Administrator of National Banks

Seventh National Bank Region
Sears Tower, Suite 5750
233 South Wacker Drive
Chicago, Illinois 60606



To: Robert B. Serino, Director
Enforcement & Compliance Division

From: John P. Sherry, Regional Counsel

Date: November 13, 1978

Subject: First National Bank
Lincolnwood, Illinois

J.P. Sherry

I. Summary

During the course of the most recent examination of referenced Bank, commencing September 17, 1978, several possible violations of the Federal Election Campaign Act of 1971, as amended (2 U.S.C. §413, et seq.), were revealed. Possible contributions to political committees were reflected in the advertising expense records of the Bank, as follows:

	<u>Recipients</u>	<u>Date</u>	<u>Amount</u>
1.	40th Ward Regular Democratic Organization	7/30/76	\$ 25.00
2.	48th Ward " " " " "	9/3/76	25.00
3.	39th Ward " " " " "	10/11/76	25.00
4.	Niles Twp. " " " " "	5/6/77	25.00
5.	40th Ward " " " " "	5/28/77	25.00
6.	Niles Twp. " " " " "	8/9/77	25.00
7.	40th Ward " " " " "	9/3/77	100.00
8.	Niles Twp. " " " " "	10/25/77	25.00
9.	39th Ward " " " " "	11/8/77	25.00
10.	Leyden Twp. " " " " "	1/17/78	100.00
11.	39th Ward " " " " "	4/8/78	25.00
12.	Niles Twp. " " " " "	6/20/78	50.00
13.	40th Ward " " " " "	7/24/78	15.00

7 9 0 4 0 1 6 0 3 5 0

November 13, 1978

Page Two

II. Evidence

For your reference, we are enclosing copies of all of the expense checks involved, as well as several receipts issued by the respective political organization. In addition, we also enclose a copy of the advertising expense ledger for the three years in question. As the receipts and expense checks indicate, it appears that all of these funds were extended for the purchase of advertisements in local "ad books." We enclose a copy of a typical example of such an advertisement which appeared in an "ad book" entitled "Niles Township Regular Democratic Organization, Annual Dinner Dance, November 19, 1977."

III. Analysis

It would appear that these payments to the organizations listed above constitute "contributions" as defined in the Act. See 2 U.S.C. §431(e). Accordingly, it would appear that the Bank has violated the provisions of Section 441b(a), prohibiting contributions by national banks to political candidates and organizations.

We refer these matters to your attention for the action you deem appropriate.

Enclosures

7 9 0 4 0 1 6 0 3 5 1

FIRST NATIONAL BANK of LINCOLNWOOD

**6401 N. Lincoln Ave.
Lincolnwood, Ill.**

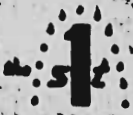
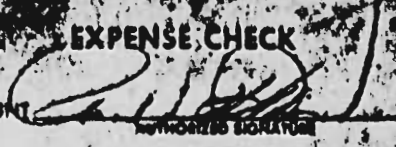
583-4800 676-3000



Harold Cohn, President

79040160352

79040160353

		NATIONAL BANK of LINCOLNWOOD LINCOLNWOOD, ILLINOIS		No. 25099	
PAY Twenty Five and 00/100		DOLLARS \$ 25.00			
TO THE ORDER OF 46TH Ward Regular Democratic Org 2533 West Peterson Ave Chicago, Illinois 60659		EXPENSE CHECK ACCOUNT  AUTHORIZED SIGNATURE			
NOT NEGOTIABLE					

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DATE	ITEMS	AMOUNT	DISTRIBUTION
7/30/76	one-fourth page ad in book	25.00	701-14

40th WARD REGULAR DEMOCRATIC ORGANIZATION

JOHN G. SEOCARIS, Committeeman

2806 WEST PETERSON AVENUE • CHICAGO, ILLINOIS 60609 • 769-3874

LESTER FOREMAN
President

GILBERT GURBER
Secretary

SOLOMON GUTSTEIN
Alderman

I hereby subscribe for representation in the ANNUAL PROGRAM BOOK.

GOLD PAGE \$200.00
FULL PAGE 100.00
1/4 PAGE 50.00
1/8 PAGE 25.00
1/16 PAGE 15.00
PATRON 10.00

The Agreed Price () Dollars

Name _____

Address _____

Obtained By JACK DECKER 11th pct.

Precinct # _____


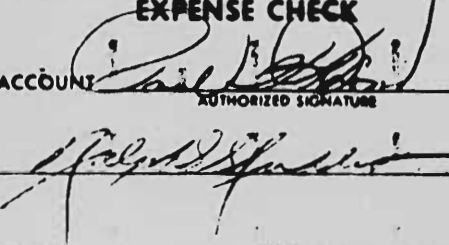
COPY — PLEASE PRINT AS IT WILL APPEAR IN PROGRAM

MAKE ALL CHECKS PAYABLE TO 40th WARD REGULAR DEMOCRATIC ORGANIZATION

79040160354

*new
Police
701-14*

79040160355

 NATIONAL BANK OF LINCOLNWOOD LINCOLNWOOD, ILLINOIS		No 25099		70-2325 719
PAY <u>Twenty-Five and 00/100</u>		7/30		1976
TO THE ORDER OF 40TH Ward Regular Democratic Org 2533 West Peterson Ave. Chicago, Illinois 60659		DOLLARS, \$25.00		
		EXPENSE CHECK		
		ACCOUNT		AUTHORIZED SIGNATURE
				
32111		86000000711		0000002500

PAY TO THE ORDER OF
COMMERCIAL NATIONAL BANK OF CHICAGO
FOR DEPOSIT ONLY
40th Ward Democratic Organization
90-106-0

ANY BANK
CHICAGO
37132

ANY BANK, P.E.O.
COMMERCIAL
NATIONAL BANK
GEORGE LINDS
2-128 2-129

4-28-48

ANY BANK
CHICAGO
2-30

79040160357

1st	NATIONAL BANK of LINCOLNWOOD LINCOLNWOOD, ILLINOIS	No 25247	70-2326 718
		Sept. 3, 1976	
PAY <u>Twenty Five and 00/100</u>		DOLLARS \$ <u>25.00</u>	
TO THE ORDER OF <u>48th Ward Regular Democratic Organization</u>		EXPENSE CHECK	
<u>3242 Sheridan Road</u> <u>Chicago, Ill. 60640</u>		ACCOUNT <u>[Signature]</u> AUTHORIZED SIGNATURE	
NOT NEGOTIABLE			

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOISDETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
9/3/76	1/2 Page Ad	25.00	701-14

79040160358

\$ _____

Chicago, _____

48th WARD REGULAR DEMOCRATIC ORGANIZATION

5242 SHERIDAN ROAD

TELEPHONE 769-3033

MARTIN TUCHOW, Committeeman

You are hereby authorized to publish an advertisement in the Annual Display Ad Book of the 48th Ward Regular Democratic Organization.

☐ HONOR ☐ FULL PAGE ☐ 1/2 PAGE ☒ 1/4 PAGE ☐ SPONSOR ☐ PATRON
GOLD PAGE \$100.00 \$50.00 \$25.00
\$250.00

COPY — PLEASE PRINT OR ATTACH COPY AS IT WILL APPEAR IN PROGRAM

For which I agree to pay the sum of: _____ (\$ _____) Dollars

Name _____ Address _____

Signed _____ Precinct No. _____

Received Payment ALBERT SOLL Solicited by AL SOLL

*7061 N. Lodge
Cliff 60645*

Please Make All Checks Payable to:
48th Ward Regular Democratic Organization
No Paid Solicitors

1. NATIONAL BANK OF LINCOLNWOOD LINCOLNWOOD, ILLINOIS		No. 25247 70-2325 718	
PAY Twenty Five and 00/100.		Sept 3 1976	
TO THE ORDER OF 48th Ward Regular Democratic Organization, 5242 Sheridan Road Chicago, Ill. 60640		DOLLARS \$ 25.00 EXPENSE CHECK ACCOUNT <i>[Signature]</i> <i>[Signature]</i> AUTHENTICATED SIGNATURE	
1:0769-23251		860-000-718	

79040160361

1 NATIONAL BANK of LINCOLNWOOD LINCOLNWOOD, ILLINOIS		No 25598
PAY <u>Twenty Five and 00/100</u>		DOLLARS \$ <u>25.00</u>
TO THE ORDER OF <u>39th Ward Regular Democratic Organisation</u>		EXPENSE CHECK
		ACCOUNT <u>[Signature]</u> AUTHORIZED SIGNATURE
NOT NEGOTIABLE		

DETACH AND RETAIN THIS STATEMENT
THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
10/11/76	One Half Page Ad	25.00	701-14

79040160362

**PROGRAM
ADVERTISING CONTRACT**

**39th WARD REGULAR
DEMOCRATIC ORGANIZATION
ALDERMAN ANTHONY C. LAURINO
WARD COMMITTEEMAN
Phone: PE 6-5594**

You are hereby authorized to insert in your Program advertisement to cover space of _____ page at \$ _____ payable before or upon demand following publication.

It is mutually understood and agreed that the foregoing contract expresses its full consideration and that verbal agreements with solicitors or agents will not be allowed.

Advertiser _____

Contract Signed by _____

Business Address _____

Representative _____

Date _____

Make All Checks Payable To
39th Ward Regular Democratic Organization

— RATES — 701-14

GOLD PAGE \$100.00

FULL PAGE 50.00

ONE HALF PAGE 25.00

ONE QUARTER PAGE 15.00

ONE FIFTH PAGE 10.00

A copy of our report filed with the county clerk is available for purchase from the Cook County Clerk, 118 North Clark Street, Chicago, Illinois

COPY

Albert Cohen
5707 N. Campbell
60654

**39th WARD REGULAR
DEMOCRATIC ORGANIZATION
ALDERMAN ANTHONY C. LAURINO
Ward Committeeman
PHONE: PE 6-5594**

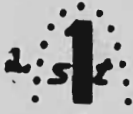
Date _____

RECEIVED OF _____

_____ \$ _____

Representative _____

79040160363

 NATIONAL BANK of LINCOLNWOOD LINCOLNWOOD, ILLINOIS		No 25598		70-2325 710
		October 11		19 76
PAY <u>Twenty Five and 00/100.</u>		DOLLARS \$		25.00
TO THE ORDER OF <u>39th Ward Regular Democratic Organization</u>		EXPENSE CHECK		
		ACCOUNT		<u><i>[Signature]</i></u> AUTHORIZED SIGNATURE
		<u><i>[Signature]</i></u>		
		1:0719 2525		860 000 710
				000000 2500

79040160364

ANY BANK
CHICAGO

12-446
ANY BANK - P.E.B.
NATIONAL BANK OF
ALBANY PARK
IN CHICAGO, ILLINOIS
2-46

OCT 20 '76 19 15908

1160

PAY TO THE ORDER OF
NATIONAL BANK OF ALBANY PARK
IN CHICAGO
FOR DEPOSIT ONLY
33th WARD REGULAR DEPOSIT
0-6079-8

7 9 0 4 0 1 6 0 3 6 5

280

F.B.I. 0710-0030-1
FEB CHICAGO

460

MAY 16 77

200
FEB
SKOKIE
J-1494

CALVIN E. SUTKER
TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-980-6
3332 93543

Ad Book CONTROLLED BY Democratic Party



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27133

70-2126
718

May 6

1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO
THE
ORDER
OF

Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

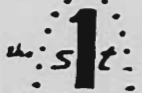
ACCOUNT

EXPENSE CHECK

0719-2325

000-7

0000002500



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27133

70-2126
718

May 6

1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO
THE
ORDER
OF

Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

ACCOUNT

EXPENSE CHECK

NOT NEGOTIABLE

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF DEBTS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
5-6-77	Advertising expense	25.00	701-14

7 9 0 4 0 1 6 0 3 6 6

0710-0030-1
1RB CHICAGO

1977 JUN 9

PAB 0710-0030-1
FRB CHICAGO

0710-0030-1
CHICAGO

1977 JUN 9

PAY TO THE ORDER OF
COMMERCIAL NATIONAL BANK OF CHICAGO
FOR DEPOSIT ONLY
40th Ward Democratic Organization
90-166-10

1 NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27274

70-2225
710

May 28

1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF
40th Ward Regular Democratic Org.
2533 W. Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK

ACCOUNT

00719-2325 860-0007

0000002500

1 NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27274

70-2225
710

May 28

1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF
40th Ward Regular Democratic Org.
2533 W. Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK

ACCOUNT

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF DEBTS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
/28/77	Advertising expense	25.00	701-34

7 9 0 4 0 1 6 0 3 6 7

0030-1
100

1977

8

2

0710-030-1
CHICAGO

1977

8

NOV -8 77

70-1494

ONAL
SKOKIE
ILLINOIS

FOR DEPOSIT ONLY IN ACCOUNT OF
CASHIER R. SUTKER
TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-9906

0710-0
CHICAGO

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27826

August 9, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

EXPENSE CHECK

TO THE
ORDER
OF

Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

ACCOUNT

[Signature]
[Signature]

0719-23256 860-000-7# 0000002500

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 27826

August 9, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

EXPENSE CHECK

TO THE
ORDER
OF

Niles Township Regular Democratic Org.
Sutker Ad Book Committee
4654 Oakton Street
Skokie, Illinois

ACCOUNT

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF DEBIT DESCRIBED BELOW.
IF NOT CORRECT PLEASE RETURN TO DEBITOR AND DEBITOR'S BANK.

DATE	ITEMS	AMOUNT	REMARKS
8/9/77	Advertising expense	25.00	701-14

7 9 0 4 0 1 6 0 3 6 8

1977
40th Ward Reg. Demo. Org.
0-90-003006
FAB 0710-003006
FAB CHICAGO

8737

JULY 1977
JULY 1977
JULY 1977

BEN E. PALMER

FROM

NELS E. WERNER

FAB 0710-003006
FAB CHICAGO

SELF

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28017

September 3, 1977

PAY One Hundred Dollars and /100

DOLLARS \$100.00

TO THE ORDER OF

40th Ward Reg. Demo. Org.

EXPENSE CHECK

ACCOUNT

0719-2325 860-000-7 0000010000

NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28017

September 3, 1977

PAY One Hundred Dollars and /100

DOLLARS \$100.00

TO THE ORDER OF

40th Ward Reg. Demo. Org.

EXPENSE CHECK

ACCOUNT

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED ABOVE.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO EXCEPT DEBTS.

DATE	ITEMS	AMOUNT	DISTRIBUTION
9/3/77	Ad	100.00	701-14

7 9 0 4 0 1 6 0 3 6 9

0710-0030-1
CHICAGO

1977

8

128

0710-0030-1
CHICAGO

1977

8 NOV

NOV-8 77

ONAL
SKOKIE
70-1494

FOR DEPOSIT ONLY IN ACCOUNT OF
CALVIN R. SUTKER
TOWNSHIP COMMITTEEMAN
NILES TOWNSHIP
Regular Democratic Organization
Account #61-990-6

PAGE



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28388

October 25, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

EXPENSE CHECK

TO THE
ORDER
OF

Niles Township Regular Democratic Org.

ACCOUNT

SIGNATURE

10719-2325

660-000-7

0000002500



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28388

October 25, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

EXPENSE CHECK

TO THE
ORDER
OF

Niles Township Regular Democratic Org.

ACCOUNT

SIGNATURE

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
10/25/77	Advertising expense 1/2 page ad with our check # 27826	25.00	701-14

7 9 0 4 0 1 6 0 3 7 0

PAY TO THE ORDER OF
NATIONAL BANK OF ALBANY PARK
IN CHICAGO
FOR DEPOSIT ONLY
39th WARD REGULAR DEMOCRATIC ORG.
0-6079-4

CHICAGO

1977

30 DEC

ANY BANK
NATIONAL BANK AND TRUST
COMPANY N.A.
CHICAGO, ILLINOIS
2-6079-4

FAB 0710-0030-1
FEB CHICAGO

1977

30 DEC

1 NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28520 70-2285 719

November 8, 1977

PAY Twenty Five and 00/100

DOLLARS \$25.00

TO THE ORDER OF
39th Ward Regular Democratic Organization
c/o Al Cohen
5707 North Campbell
Chicago, Illinois 60659

EXPENSE CHECK
ACCOUNT *[Signature]*
AUTHORIZED SIGNATURE

0719 2325 860 000 719 000000 2500

1 NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 28520 70-2285 719

November 8, 1977

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF
39th Ward Regular Democratic Organization
c/o Al Cohen
5707 North Campbell
Chicago, Illinois 60659

EXPENSE CHECK
ACCOUNT *[Signature]*
AUTHORIZED SIGNATURE
NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF FEE AS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
1/24/77	Advertising - half page	25.00	701-14

7 9 0 4 0 1 6 0 3 7 1

PAY TO THE ORDER OF
MAYWOOD-PROVISO STATE BANK
FOR DEPOSIT ONLY
LEYDEN TOWNSHIP
REGULAR DEMOCRATIC ORGANIZATION
SPECIAL ACCOUNT
51-901-4

10/10/80-1
CHICAGO

30
18A

PAY ANY BANK, P.E.G.
70-2252 70-2252
MAYWOOD-PROVISO
STATE BANK
MAYWOOD, ILLINOIS

1354

001 012678



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29012

January 17, 1978

PAY One Hundred Dollars and no/100

DOLLARS \$ 100.00

TO THE ORDER OF
Leyden Township Regular
Democratic Organization
(For Annual Dinner Dance Ad)

EXPENSE CHECK
ACCOUNT *[Signature]*
[Signature]

⑆0719⑈2325⑆ 850⑈000⑈7⑈ ⑈00000⑈10000⑈



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29012

January 17, 1978

PAY One Hundred Dollars and no/100

DOLLARS \$ 100.00

TO THE ORDER OF
Leyden Township Regular
Democratic Organization

EXPENSE CHECK
ACCOUNT *[Signature]*
NOT NEGOTIABLE
[Signature]

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF
IT IS NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT ISSUED.

DATE	ITEMS	AMOUNT	DISTRIBUTION
1/17/78	Annual Dinner Dance -Ad	100.00	701-14

7 9 0 4 0 1 6 0 3 7 2

NATIONAL BANK OF ALBANY PARK
39th WARD REGULAR DEMOCRATIC ORG.
0-6875

0710 0030

0710-0030

CHICAGO

ALBANY BANK AND TRUST
876 N. PULASKI
CHICAGO, ILLINOIS



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29672

April 8, 1978

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF

39th Ward Regular Democratic Organization

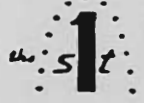
EXPENSE CHECK

ACCOUNT

Dolly Polward
John J. Polward

10719 2325 80000000

000000250



NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 29672

April 8, 1978

PAY Twenty five and 00/100

DOLLARS \$25.00

TO THE ORDER OF

39th Ward Regular Democratic Organization

EXPENSE CHECK

ACCOUNT

Dolly Polward
John J. Polward

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE FIRST NATIONAL BANK OF LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

DATE	ITEMS	AMOUNT	DESCRIPTION
4/8/78	Advertising	25.00	781-34

FOR DEPOSIT ONLY IN ACCOUNT OF
 CALVIN R. SUTKER
 TOWNSHIP COMMITTEEMAN
 NILES TOWNSHIP
 Regular Democratic Organization
 Account #61-990-6

7 9 0 4 0 1 6 0 3 7 3

NATIONAL BANK of LINCOLNWOOD
 LINCOLNWOOD, ILLINOIS

No 30284

June 20

1978

PAY Fifty and 00/100

DOLLARS \$50.00

TO THE ORDER OF

Niles Township Regular Democratic Organization
 c/o H. Leavitt
 3337 Columbia
 Lincolnwood, Illinois 60645

EXPENSE CHECK

ACCOUNT

10719 2325

860 000 711

#0000005000

NATIONAL BANK of LINCOLNWOOD
 LINCOLNWOOD, ILLINOIS

No 30284

June 20

1978

Y Fifty and 00/100

50 DOLLARS \$50.00

Niles Township Regular Democratic Organization
 c/o H. Leavitt
 3337 Columbia
 Lincolnwood, Illinois 60645

EXPENSE CHECK

ACCOUNT

NOT NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF DEBTS DESCRIBED BELOW.
 IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT REQUIRED.

NATIONAL BANK OF LINCOLNWOOD
 LINCOLNWOOD, ILLINOIS

DATE	ITEMS	AMOUNT	DESCRIPTION
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FOR DEPOSIT ONLY
40th Ward Democratic Organization
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CHICAGO, ILLINOIS
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1 NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 30518 70-2325 718

July 24, 1978

PAY Fifteen and 00/100 DOLLARS \$15.00

TO THE ORDER OF 40th Ward Regular Democratic Organization
2533 West Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK
ACCOUNT *[Signature]*
70-2325 718
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1 NATIONAL BANK of LINCOLNWOOD
LINCOLNWOOD, ILLINOIS

No 30518 70-2325 718

July 24, 1978

PAY Fifteen and 00/100 DOLLARS \$15.00

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2533 West Peterson Avenue
Chicago, Illinois 60659

EXPENSE CHECK
ACCOUNT *[Signature]*
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DATE	ITEMS	AMOUNT	DISTRIBUTION
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FEDERAL ELECTION COMMISSION

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WASHINGTON, D.C. 20463

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