



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 2077

Date Filmed 7/10/86 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Conciliatory materials ; Cover page to
Referral ; 12 day reports ; Comment
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| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed Maura White Callaway
 date July 9, 1986

FEC 8-21-77

95040575063



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

June 24, 1986

Jan Baran, Esquire
Wiley and Rein
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2077
Seaboard System Railroad
Political Action Committee-
State; Seaboard System
Railroad Political Action
Committee-Federal; Beverly
Thompson, as treasurer

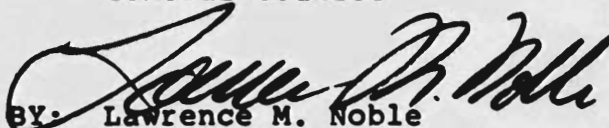
Dear Mr. Baran:

On June 17, 1986, the Commission accepted the conciliation agreements signed by you on behalf of your clients, Seaboard System Railroad Political Action Committee-State, Seaboard System Railroad Political Action Committee-Federal and Beverly Thompson, as treasurer, in settlement of a violation of 11 C.F.R. § 102.5(a)(1)(i). Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find fully executed copies of the final conciliation agreements for your files.

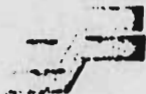
Sincerely,

Charles N. Steele
General Counsel


BY: Lawrence M. Noble
Deputy General Counsel

Enclosure
Conciliation Agreements

86040575064



SEABOARD SYSTEM RAILROAD, INC.
TREASURY DEPARTMENT JACKSONVILLE, FLORIDA

2770

June 6 19 86

63-2
630 01

PAY TO THE ORDER OF **UNITED STATES TREASURER**

\$ 500.00

500 DOLLARS

DOLLARS



Atlantic Bank
Atlantic National Bank of Florida
200 West Forsyth Street Office
Jacksonville, Florida 32202

[Signature]
[Signature]

COUNTERSIGNED

⑈002770⑈ -⑈06300002⑈1⑈1⑈500002940⑈

86040595065

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Seaboard System Railroad
Political Action Committee-State

)
)
) MUR 2077
)
)
)

CONCILIATION AGREEMENT

85040595056
This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Seaboard System Railroad Political Action Committee - State ("Respondent") violated 11 C.F.R. § 102.5(a)(1)(i). The Commission also found no probable cause to believe that Respondent violated 2 U.S.C. § 441b(a).

NOW, THEREFORE, the Commission and the Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent, and the subject matter of this proceeding.

II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondent enters voluntarily into this agreement with the Commission.

IV. 1. Respondent, Seaboard System Railroad Political Action Committee - State, is the state account of Seaboard System Railroad (CSX Corporation).

2. Seaboard System Railroad Political Action Committee - Federal is the federal account of Seaboard System Railroad, and is registered with the Commission as a political committee.

3. Seaboard System Railroad Political Action Committee - Federal reported the receipt of \$2,250 from the Respondent on February 3, 1984.

4. Seaboard System Railroad Political Action Committee - Federal reported the receipt of \$3,700 from the Respondent on November 18, 1984.

5. Seaboard System Railroad Political Action Committee - Federal refunded \$2,250 to the Respondent on April 23, 1985.

6. Seaboard System Railroad Political Action Committee - Federal refunded \$3,700 to the Respondent on June 11, 1985.

7. Pursuant to 11 C.F.R. § 102.5(a)(1)(i), an organization which finances political activity in connection with both federal and non-federal elections shall deposit into its federal account only funds subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended ("the Act"). In addition, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. Id.

8. Respondent contends that none of the funds transferred contained any contribution which is prohibited by or in excess of any limitation of the Act.

V. Respondent violated 11 C.F.R. § 102.5(a)(1)(i) by transferring \$5,950 to the federal account of Seaboard System Railroad, the Seaboard System Railroad Political Action Committee - Federal.

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred and Fifty Dollars (\$250) pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

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VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION

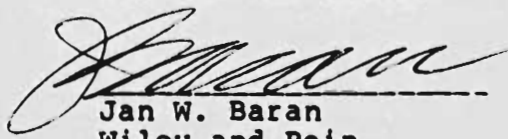
Charles N. Steele
General Counsel

By: 

Lawrence M. Noble
Deputy General Counsel

4/23/86
Date

FOR THE RESPONDENT:


Jan W. Baran
Wiley and Rein
Counsel for Respondent

5/27/86
Date

8604075058

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Seaboard System Railroad) MUR 2077
Political Action Committee-Federal;)
Beverly Thompson, as treasurer)

CONCILIATION AGREEMENT

85040595069
This matter was initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Seaboard System Railroad Political Action Committee - Federal and Beverly Thompson, as treasurer, ("Respondents") violated 11 C.F.R. § 102.5(a)(1)(i). The Commission also found no probable cause to believe that the Respondents violated 2 U.S.C. § 441b(a).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents, and the subject matter of this proceeding.

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

IV. 1. Respondent, Seaboard System Railroad Political Action Committee - Federal, is a political committee registered with the Commission, and is the federal account of Seaboard System Railroad (CSX Corporation).

2. Respondent, Beverly Thompson, is the treasurer of Seaboard System Railroad Political Action Committee - Federal, although she was not treasurer at the time of the activities described in IV.4 and IV.5

3. The Seaboard System Railroad Political Action Committee - State is the non-federal account of Seaboard System Railroad.

4. On February 3, 1984, the Respondents accepted \$2,250 from the Seaboard System Railroad Political Action Committee - State.

5. On November 18, 1984, the Respondents accepted \$3,700 from the Seaboard System Railroad Political Action Committee - State.

6. On April 23, 1985, the Respondents refunded \$2,250 to the Seaboard System Railroad Political Action Committee - State.

7. On June 11, 1985, the Respondents refunded \$3,700 to the Seaboard System Railroad Political Action Committee - State.

8. Pursuant to at 11 C.F.R. § 102.5(a)(1)(i), an organization which finances political activity in connection with both federal and non-federal elections shall deposit into its federal account only funds subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended ("the Act"). In addition, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. Id.

9. Respondents contend that none of the funds transferred contained any contribution which is prohibited by or in excess of any limitation in the Act.

V. Respondents violated 11 C.F.R. § 102.5(a)(1)(i) by accepting transfers totalling \$5,950 from the non-federal account of Seaboard System Railroad, the Seaboard System Railroad Political Action Committee - State.

VI. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred and Fifty Dollars (\$250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 431, et seq.

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VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XI. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION

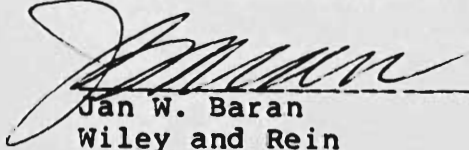
Charles N. Steele
General Counsel

BY: 

Lawrence M. Noble
Deputy General Counsel

6/23/86
Date

FOR THE RESPONDENTS:


Jan W. Baran
Wiley and Rein
Counsel for Respondents

5/27/86
Date

86040595071

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Seaboard System Railroad)
Political Action Committee)
- State) MUR 2077
Seaboard System Railroad)
Political Action Committee)
- Federal)
Beverly Thompson, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of June 17, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2077:

1. Accept the conciliation agreements with Seaboard System Railroad Political Action Committee-State, and Seaboard System Railroad Political Action Committee-Federal and Beverly Thompson, as treasurer, as recommended in the General Counsel's report dated June 5, 1986.
2. Close the file.
3. Approve the letter attached to the General Counsel's report dated June 5, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald, and McGarry voted affirmatively for the decision.

Attest:

6-18-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

36040595072



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 4, 1986

Jan Baran, Esquire
Wiley and Rein
1776 K Street, N.W.
Washington, D.C. 20006

Re: MUR 2077
Seaboard System Railroad
Political Action Committee-
Federal; Beverly Thompson, as
treasurer; Seaboard System
Railroad Political Action
Committee-State

Dear Mr. Baran:

On February 25, 1986, the Commission determined that there is probable cause to believe your clients, Seaboard System Railroad Political Action Committee-Federal, Beverly Thompson, as treasurer, and Seaboard System Railroad Political Action Committee-State, violated 11 C.F.R. § 102.5(a)(1)(i) in connection with the transfers of funds from the non-federal account of Seaboard System Railroad into the federal account of Seaboard System Railroad. The Commission also determined on February 25, 1986, that there is no probable cause to believe your clients violated 2 U.S.C. § 441b(a) in connection with the above transfers.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

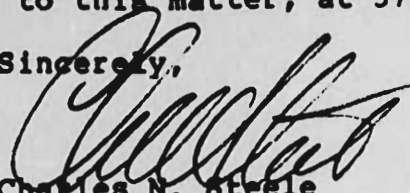
We enclose two conciliation agreements that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreements, please sign and return them to the Commission within ten days. I will then recommend that the Commission approve the agreements.

86040395073

Letter to Jan Baran
Page 2

If you have any questions or suggestions for changes in the enclosed conciliation agreements, please contact Maura White Callaway, the staff member assigned to this matter, at 376-5690.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Conciliation Agreements

86040375074

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Seaboard System Railroad)
Political Action Committee) MUR 2077
-Federal;)
Beverly Thompson, as treasurer)
Seaboard System Railroad)
Political Action Committee)
- State)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the
Federal Election Commission executive session of
February 25, 1986, do hereby certify that the Commission
decided by a vote of 6-0 to take the following actions in
MUR 2077:

1. Find no probable cause to believe the
Seaboard System Railroad Political
Action Committee-Federal, Beverly
Thompson, as treasurer, and Seaboard
System Railroad Political Action Committee-
State violated 2 U.S.C. § 441b(a).
2. Find probable cause to believe Seaboard
System Railroad Political Action Committee
-Federal, Beverly Thompson, as treasurer,
and Seaboard System Railroad Political
Action Committee-State violated 11 C.F.R.
§ 102.5(a)(1)(i).

(Continued)

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FEDERAL ELECTION COMMISSION
Certification for MUR 2077
February 25, 1986

Page 2

3. Approve the proposed conciliation agreements and letter attached to the General Counsel's report dated February 18, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald, and McGarry voted affirmatively for the decision.

Attest:

2-26-86

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

86040595076



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *Rd*
DATE: February 18, 1986
SUBJECT: MUR 2077 -General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of February 25, 1986

Open Session _____
Closed Session XX

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information []
Sensitive []
Non-Sensitive []

Other [XX]

DISTRIBUTION

Compliance [XX]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

SENSITIVE -

CIRCULATE ON BLUE PAPER

on Agenda 2-25-86

86040395077

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

EXHIBIT SECTION

FILED
FEB 25 1986
SECRETARY

Seaboard System Railroad)
Political Action Committee-Federal;)
Beverly Thompson, as treasurer;)
Seaboard System Railroad Political)
Action Committee-State)

MUR 2077 18 P 3:28

FEB 25 1986

GENERAL COUNSEL'S REPORT

I. Background

On November 26, 1985, General Counsel's Briefs were mailed to Seaboard System Railroad Political Action Committee - Federal ("Federal PAC"), Beverly Thompson, as treasurer, and Seaboard System Railroad Political Action Committee - State ("State PAC"). After a request for an extension of time to respond was granted by this office, the respondents submitted a reply brief on January 6, 1986.

II. Legal Analysis

In response to the General Counsel's Briefs the respondents concur with the recommendation that there is no probable cause to believe the Federal PAC, Beverly Thompson, as treasurer, or the State PAC violated 2 U.S.C. § 441b(a). See the General Counsel's Briefs in MUR 2077. The response brief, however, also urges the Commission to take no further action with respect to a violation of 11 C.F.R. § 102.5(a)(1)(i).

In support of their position that the Commission should take no further action concerning the transfers of funds between the State PAC and the Federal PAC (11 C.F.R. § 102.5(a)(1)(i)) the respondents argue that "several FEC advisory opinions demonstrate that such transfers could be permissible and, if certain formalities had been observed, need not have been refunded."

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The respondents argue that "since State PAC has no funds that are either prohibited by the Act or in excess of the limit, it could make an unlimited transfer to the Federal PAC on the basis that the two entities are affiliated," and that this is the conclusion in Advisory Opinions 1984-31 and 1982-52. The respondents note that the transfer would trigger political committee status, but argue that "[a]ll that State PAC need do is file one registration statement, and one report which would be both its initial and termination reports as dictated by Advisory Opinion 1982-52." The respondents also alternatively argue that under Advisory Opinion 1984-31 the "State PAC could serve as a 'collecting agent' for Federal PAC without becoming a political committee," and that "[d]ifferent formalities would have to be observed relating to contribution permission and acknowledgement."

With respect to the above arguments, it is the view of this office that such are without merit. Although the respondents contend that the cited Advisory Opinions demonstrate that transfers can be permissible, they correctly note that certain formalities need to be observed. In the instant matter, such formalities were not observed. To be sure, the State PAC did not register and report as a political committee in conjunction with either transfer at issue. Moreover, the State PAC neither acted as a collecting agent for the Federal PAC in accordance with 11 C.F.R. § 102.6(b) and (c), nor obtained the requisite contributor authorizations for the transfers. See Advisory Opinion 1984-31.

Additional arguments raised by the respondents are that this is a case of first impression, and that because the transfers were refunded and not prohibited, the Commission should take no further action. As discussed in the General Counsel's Briefs, it is the view of this office that even though prohibited funds apparently were not contained in the State PAC the respondents nonetheless violated 11 C.F.R. § 102.5(a)(1)(i). The regulations expressly state at 11 C.F.R. § 102.5(a)(1)(i) that transfers between federal and non-federal accounts are prohibited. Aside from the potential of prohibited funds reaching the federal account, the restriction on the transfer is in part the consequence of 11 C.F.R. § 102.5(a)(2) which stipulates that only certain contributions, meeting a notice requirement as to the use of the money, can be deposited into a federal account. Moreover, although the transfers at issue were ultimately refunded, the refunds were not made in accordance with 11 C.F.R. § 103.3, and the Federal PAC had the use of the State PAC's money during an election year and for as much as 14 months.

In view of the foregoing it is the recommendation of this office that the Commission find no probable cause to believe Seaboard System Railroad Political Action Committee-Federal, Beverly Thompson, as treasurer, and Seaboard System Railroad Political Action Committee-State violated 2 U.S.C. § 441b(a), and find probable cause to believe Seaboard System Railroad Political Action Committee-Federal, Beverly Thompson, as treasurer, and Seaboard System Railroad Political Action Committee-State violated 11 C.F.R. § 102.5(a)(1)(i).

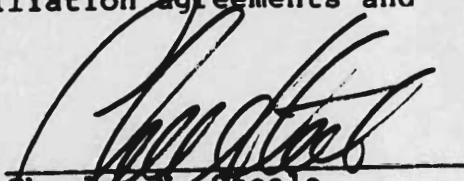
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III. Discussion of Conciliation and Civil Penalties

IV. Recommendations

1. Find no probable cause to believe the Seaboard System Railroad Political Action Committee-Federal, Beverly Thompson, as treasurer, and Seaboard System Railroad Political Action Committee-State violated 2 U.S.C. § 441b(a).
2. Find probable cause to believe Seaboard System Railroad Political Action Committee-Federal, Beverly Thompson, as treasurer, and Seaboard System Railroad Political Action Committee-State violated 11 C.F.R. § 102.5(a)(1)(i).
3. Approve the attached proposed conciliation agreements and letter.

18 FEB 1966
Date


Charles N. Steele
General Counsel

Attachment

- 1 - Proposed agreements and letter

86040595081

Callaway

GC# 9336

WILEY & REIN

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

WRITER'S DIRECT DIAL NUMBER

(202) 429-7330

January 6, 1986

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
86 JAN 6 9:43

Ms. Marjorie W. Emmons
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

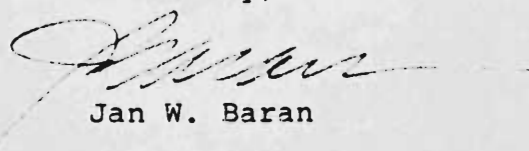
Re: Matter Under Review 2077

Dear Madame Secretary:

Pursuant to 11 C.F.R. § 111.16(c) I hereby submit the original and ten (10) copies of Respondents' Brief regarding the above-captioned matter.

By copy of this letter I am transmitting three (3) copies to Charles N. Steele, General Counsel.

Sincerely,


Jan W. Baran

JWB/njl
Enclosures
cc: Charles N. Steele ✓

8604052

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

Seaboard System Railroad)
Political Action Commission - State;)
Seaboard System Railroad) MUR 2077
Political Action Committee - Federal;)
Beverly Thompson, as Treasurer.)

RESPONDENTS' BRIEF

36040525083
Pursuant to 11 C.F.R. § 111.16(c), above captioned Respondents file this Brief by counsel in response to the General Counsel's Briefs dated November 20, 1985. For the reasons stated below Respondents request the Federal Election Commission ("FEC") to find no probable cause that a violation of 2 U.S.C. § 441b occurred and to take no further action in this matter.

I. FACTS

Respondents summarize the facts as follows. Respondents are the State PAC and Federal PAC of Seaboard System Railroad, and the treasurer of the Federal PAC (who was not treasurer at the time of the transactions subject to this matter). The State PAC transferred \$2,250 and \$3,700 to the Federal PAC on February 3, 1984 and November 18, 1984, respectively.

At the suggestion of the Reports Analysis Division of the FEC, refunds in identical amounts were made by the Fed-

eral PAC to the State PAC on April 23, 1985 and June 11, 1985, respectively.

The State PAC does not accept and never has accepted contributions from corporations. Copies of reports filed by the State PAC with the State of Florida and submitted to the FEC on October 9, 1985 confirm this. The same reports which cover the period of 1/1/84 through 6/30/85 demonstrate that only individuals contributed to the State PAC. The individuals were identical to those who contributed to the Federal PAC. No individual gave more than \$210 (in 1984) or \$100 (in 1985) to the State PAC.

II. PRIOR FEC FINDINGS

On August 28, 1985 the FEC found reason to believe that Respondents violated 2 U.S.C. § 441b(a) (making and receiving corporate contributions) and 11 C.F.R. § 102.5(a)(1)(i) (transfer from state account to federal account).

III. ARGUMENT

A. There is No Probable Cause to Believe That Section 441b(a) Has Been Violated

Respondents concur with the recommendation of the General Counsel that there is no probable cause to believe that Respondents violated 2 U.S.C. § 441ba. For the reasons stated in the General Counsel's Briefs and in Respondents'

letter of October 9, 1985, no corporate funds have been accepted by any of the Respondents.

B. The FEC should Take No Further Action

The General Counsel's Briefs recommend that the FEC find probable cause to believe that Respondents violated regulation section 102.5(a)(1)(i). The recommendation infers that transfers of the sort subject to this matter are prohibited. However, several FEC advisory opinions demonstrate that such transfers could be permissible and, if certain formalities had been observed, need not have been refunded.

For example, since State PAC has no funds that are either prohibited by the Act or in excess of its limit, it could make an unlimited transfer to Federal PAC on the basis that the two entities are affiliated. This is the conclusion in Advisory Opinions 1984-31 and 1982-52. The consequence of such a transfer is not that it is prohibited, but rather that State PAC would trigger "political committee" status under the Act. All that State PAC need do is file one registration statement, and one report which would be both its initial and termination reports as dictated by Advisory Opinion 1982-52. Such a report would reveal the names of the same individuals who have already donated to Federal PAC.

Alternatively, State PAC could serve as a "collecting agent" for Federal PAC without becoming a political committee. Different formalities would have to be observed relat-

ing to contributor permission and acknowledgement. See Advisory Opinion 1984-31. Since the contributors to State PAC and Federal PAC are identical, it safely can be presumed that such permission, if requested, would have been forthcoming.

Rather than go through one of the above formal procedures Federal PAC refunded the transfers under the belief that transfers were flatly prohibited and unaware of the alternatives that the FEC advisory opinions provide.

There is no previous FEC matter in which there was a finding of probable cause or a conciliation agreement regarding § 102.5, other than in cases in which funds prohibited by the Act were transferred. See MUR 1479, 1625 and 1680. Thus, this case is a matter of first impression.

In light of the facts that:

1. The transfers in question contained only individual contributions of less than \$210;
2. Were from individuals who had also donated to the Federal PAC;
3. Were refunded, and
4. Could have been kept by the Federal PAC if certain easily met formalities, of which it was unaware, were complied with; the FEC should take no further action in this matter.

V. CONCLUSION

For the reasons stated above, the FEC should find no probable cause to believe that Respondents violated 2 U.S.C. § 441b(a), and thereafter take no further action in this matter.

Respectfully submitted,



Jan W. Baran
WILEY & REIN
1776 K Street, N.W.
Washington, D.C. 20006
(202) 429-7330

Counsel for Respondents

January 6, 1986

86040375087



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1985

Jan Baran, Esquire
Wiley and Rein
1776 K Street, N.W.
Washington, D.C. 20006

Re: MUR 2077
Seaboard System Railroad Political
Action Committee-Federal;
Beverly Thompson, as treasurer;
Seaboard System Railroad Political
Action Committee-State

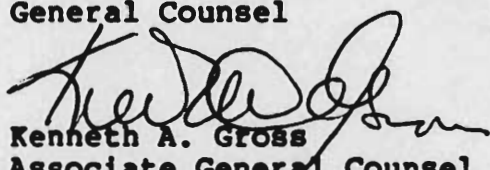
Dear Mr. Baran:

This is in response to your letter dated December 6, 1985, in which you request a 20 day extension of time to respond to the General Counsel's Briefs concerning your clients, Seaboard System Railroad Political Action Committee-Federal, Beverly Thompson, as treasurer, and Seaboard System Railroad Political Action Committee-State. I have reviewed your request and agree to an extension of time. The responses of your clients are due, therefore, on January 6, 1986.

If you have any questions please contact Maura White Callaway at 376-5690.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

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WILEY & REIN

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

WRITER'S DIRECT DIAL NUMBER
(202) 429-7330

December 6, 1985

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2077 (Seaboard System Railroad PAC, et al.)

Dear Mr. Gross:

This letter is pursuant to our telephone conversation of this date. I am in receipt of the General Counsel briefs pertaining to our clients in the above-referenced matter. According to our calculation, a response would be due on December 17, 1985.

As I informed you today, I will be leaving on a business trip that will take me out of the country on Saturday, December 7, 1985. I will not return to Washington, D.C. until Wednesday, December 18, 1985. For this reason, I request an extension of time within which to respond to the briefs. Specifically, I request an extension of twenty (20) days up to and including Monday, January 6, 1986.

Sincerely yours,


Jan W. Baran

JWB/njl

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LEY & REIN

1776 K STREET N.W.
WASHINGTON, D.C. 20006

Kenneth A. Gross, Esq.
Associate General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

66:64 00109



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *RMB*
DATE: November 22, 1985
SUBJECT: MUR 2077 - Memorandum to the Commission

The attached is submitted as an Agenda document
for the Commission Meeting of _____
Open Session _____
Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information [X]
Sensitive [X]
Non-Sensitive []

Other []

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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OFFICE OF THE FEC
SECRETARY

85 NOV 25 P 3: 08

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel *CNS*

SUBJECT: MUR #2077

Attached for the Commission's review are two briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of each brief and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission findings of no probable cause to believe and probable cause to believe were mailed on November 22, 1985. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

1. Briefs (2)
2. Letter to Respondents

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BEFORE THE FEDERAL ELECTION COMMISSION

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OFFICE OF THE CLERK
FEDERAL ELECTION COMMISSION

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Seaboard System Railroad)
Political Action Committee-Federal;) MUR 2077
Beverly Thompson, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

The instant matter was initiated by the Federal Election Commission pursuant to information ascertained in the normal course of its supervisory responsibilities.

The 1984 March Monthly Report filed by the Seaboard System Railroad Political Action Committee-Federal ("Federal Committee") disclosed the receipt of \$2,250 on February 3, 1984, from the Seaboard System Railroad Political Action Committee-State ("State Committee").^{1/} The State Committee is the non-federal account of Seaboard System Railroad (CSX Corporation). A Request for Additional Information ("RFAI") was sent by the Reports Analysis Division ("RAD") to the Federal Committee on April 9, 1985, advising that the transfer of funds into a federal account from a non-federal account is prohibited by 11 C.F.R. § 102.5(a)(1)(i). The RFAI recommended that the Federal Committee refund the full amount of the contribution to the non-federal account.

On April 22, 1985, W. Edward Whitfield, secretary of the Federal Committee, called a staff member of RAD to discuss the RFAI dated April 9, 1985. Mr. Whitfield stated that he was not aware of the prohibition against the transfer of funds from a

^{1/} The Federal Committee's 1984 March Monthly Report (2-1-84 through 2-29-84) disclosed \$1,520.08 in cash-on-hand at the end of the reporting period.

non-federal account into a federal account, and that he would immediately refund \$2,250 to the non-federal account and send a copy of the refund check. In addition, Mr. Whitfield noted that the Federal Committee's response to an RFAI that was sent concerning the 30 Day Post-General Report would indicate that the Federal Committee had received another transfer of \$3,700 from the non-federal account. Mr. Whitfield stated that upon receipt of notification from the Commission he would issue a refund of \$3,700 to the non-federal account.

On April 25, 1985, the Federal Committee submitted its response to the RFAI dated April 9, 1985. The response included a copy of a check drawn on the Federal Committee's account and payable to the State Committee. The check was in the amount of \$2,250 and dated April 23, 1985. The 1985 May Monthly Report of the Federal Committee disclosed the above refund to the State Committee.

The Federal Committee's response of April 25, 1985, referenced its receipt of \$3,700 from the State Committee and noted that "[u]pon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify the transfer." On April 26, 1985, the Federal Committee submitted an amended 30 Day Post-General Report which disclosed the receipt of \$3,700 from the State Committee on November 18, 1984.^{2/} An RFAI was sent to the Federal Committee on May 8, 1985, advising that the full amount of the contribution should be

^{2/} The Federal Committee's 1984 Post-General Election Report (10-18-84 through 11-26-84) disclosed \$388.80 in cash-on-hand at the end of the reporting period.

returned to the State Committee. A second notice was sent to the Federal Committee on May 30, 1985, for failure to respond to the original RFAI. On June 17, 1985, the Federal Committee responded to the RFAI and second notice by providing a copy of a refund check dated June 11, 1985, from the Federal Committee to the State Committee in the amount of \$3,700. The Federal Committee's 1984 July Monthly Report disclosed the refund of \$3,700 to the State Committee on June 11, 1985.

On August 28, 1985, the Commission determined that there is reason to believe the Federal Committee and Beverly Thompson, as treasurer, violated 11 C.F.R. § 102.5(a)(1)(i) and 2 U.S.C. § 441b(a). Notification of the Commission's finding was mailed to the Federal Committee and Beverly Thompson, as treasurer, on September 5, 1985. On October 9, 1985, a response to the Commission's reason to believe finding was submitted.

The response submitted by the Federal Committee states that "[t]he basis of the FEC's finding is the mistaken belief that transfers of funds from the state PAC to the federal PAC contained monies which were donated by corporations." The response explains that the transfers at issue "did not include any corporate monies," and that "[a]ll contributions to the state PAC are from individuals employed by Seaboard System Railroad."

The response emphasizes that "the contributors to both the state PAC and the federal PAC are identical."

In support of its position the Federal Committee submitted copies of the reports filed by the State Committee with the State of Florida covering the period of January 1, 1984, through June 30, 1985. A review of the reports has revealed that during the above period the State Committee did not accept any corporate or labor union contributions, and that the source of all of the contributions received were individuals. According to the Federal Committee's response, it "has never accepted donations from corporations."

Pursuant to 11 C.F.R § 102.5(a)(1)(i), an organization which finances political activity in connection with both federal and non-federal elections shall deposit into its federal account only funds subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended. In addition, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. Id.

As set forth at 2 U.S.C. § 441b(a) corporations and labor organizations are prohibited from making contributions or expenditures in connection with federal elections, and political committees are prohibited from knowingly accepting or receiving any contribution prohibited under 2 U.S.C. § 441b(a).

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The record in this matter demonstrates that the Federal Committee accepted transfers totalling \$5,950 from the State Committee during 1984. The Commission's finding that there is reason to believe the Federal Committee and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a) in connection with the above transfers was based upon the fact that the monies in the State Committee's account appeared to constitute commingled funds in that corporate and labor union contributions are permissible under Florida state law. Insofar as the State Committee's account has never contained commingled funds, it appears that the Federal Committee did not accept any funds prohibited under 2 U.S.C. § 441b(a). It is, therefore, the recommendation of the Office of the General Counsel that the Commission find no probable cause to believe the Federal Committee and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a).

With respect to the direct transfer of funds from the State Committee to the Federal Committee it is the view of this office that such transfers were nonetheless in violation of 11 C.F.R. § 102.5(a)(1)(i). The prohibition on the transfer of funds between federal and non-federal accounts is a consequence of the Commission's regulations at 11 C.F.R. § 102.5(a)(2) which provides that only the following contributions may be deposited into a federal account: those that are designated for a federal account; those that result from a solicitation which expressly

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states that the contribution will be used in connection with a federal election; and, those that are from contributors who are informed that all contributions are subject to the limitations and prohibitions of the Act. Although the transfers from the State Committee were refunded by the Federal Committee, such transfers were not refunded in accordance with 11 C.F.R. § 103.3. It is, therefore, the recommendation of the Office of the General Counsel that the Commission find probable cause to believe the Federal Committee and Beverly Thompson, as treasurer, violated 11 C.F.R. § 102.5(a)(1)(i) by accepting transfers from the State Committee.

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe the Seaboard System Railroad Political Action Committee - Federal and Beverly Thompson, as treasurer, violated 11 C.F.R. § 102.5(a)(1)(i).
2. Find no probable cause to believe the Seaboard System Railroad Political Action Committee - Federal and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a).

Date

Charles N. Steele
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

Seaboard System Railroad)
Political Action Committee-State) MUR 2077

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

The instant matter was initiated by the Federal Election Commission pursuant to information ascertained in the normal course of its supervisory responsibilities.

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The 1984 March Monthly Report filed by the Seaboard System Railroad Political Action Committee-Federal ("Federal Committee") disclosed the receipt of \$2,250 on February 3, 1984, from the Seaboard System Railroad Political Action Committee-State ("State Committee").^{1/} The State Committee is the non-federal account of Seaboard System Railroad (CSX Corporation). A Request for Additional Information ("RFAI") was sent by the Reports Analysis Division ("RAD") to the Federal Committee on April 9, 1985, advising that the transfer of funds into a federal account from a non-federal account is prohibited by 11 C.F.R. § 102.5(a)(1)(i). The RFAI recommended that the Federal Committee refund the full amount of the contribution to the non-federal account.

On April 22, 1985, W. Edward Whitfield, secretary of the Federal Committee, called a staff member of RAD to discuss the RFAI dated April 9, 1985. Mr. Whitfield stated that he was not aware of the prohibition against the transfer of funds from a

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non-federal account into a federal account, and that he would immediately refund \$2,250 to the non-federal account and send a copy of the refund check. In addition, Mr. Whitfield noted that the Federal Committee's response to an RFAI that was sent concerning the 30 Day Post-General Report would indicate that the Federal Committee had received another transfer of \$3,700 from the non-federal account. Mr. Whitfield stated that upon receipt of notification from the Commission he would issue a refund of \$3,700 to the non-federal account.

On April 25, 1985, the Federal Committee submitted its response to the RFAI dated April 9, 1985. The response included a copy of a check drawn on the Federal Committee's account and payable to the State Committee. The check was in the amount of \$2,250 and dated April 23, 1985. The 1985 May Monthly Report of the Federal Committee disclosed the above refund to the State Committee.

The Federal Committee's response of April 25, 1985, referenced its receipt of \$3,700 from the State Committee and noted that "[u]pon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify the transfer." On April 26, 1985, the Federal Committee submitted an amended 30 Day Post-General Report which disclosed the receipt of \$3,700 from the State Committee on November 18, 1984.^{2/} An RFAI was sent to the Federal Committee on May 8, 1985, advising that the full amount of the contribution should be

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On August 28, 1985, the Commission determined that there is reason to believe the State Committee violated 11 C.F.R. § 102.5(a)(1)(i) and 2 U.S.C. § 441b(a). Notification of the Commission's finding was mailed to the State Committee on September 5, 1985. On October 9, 1985, a response to the Commission's reason to believe finding was submitted.

The response submitted by the State Committee states that "[t]he basis of the FEC's finding is the mistaken belief that transfers of funds from the state PAC to the federal PAC contained monies which were donated by corporations." The response explains that the transfers at issue "did not include any corporate monies," and that "[a]ll contributions to the state PAC are from individuals employed by Seaboard System Railroad." The response emphasizes that "the contributors to both the state PAC and the federal PAC are identical."

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In support of its position the State Committee submitted copies of the reports it filed with the State of Florida covering the period of January 1, 1984, through June 30, 1985. A review of the reports has revealed that during the above period the State Committee did not accept any corporate or labor union contributions, and that the source of all of the contributions received were individuals. According to the State Committee's response, it "has never accepted donations from corporations."

Pursuant to 11 C.F.R § 102.5(a)(1)(i), an organization which finances political activity in connection with both federal and non-federal elections shall deposit into its federal account only funds subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended. In addition, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. Id.

As set forth at 2 U.S.C. § 441b(a) corporations and labor organizations are prohibited from making contributions or expenditures in connection with federal elections, and political committees are prohibited from knowingly accepting or receiving any contribution prohibited under 2 U.S.C. § 441b(a).

The record in this matter demonstrates that the State Committee made transfers totalling \$5,950 to the Federal Committee during 1984. The Commission's finding that there

is reason to believe the State Committee violated 2 U.S.C. § 441b(a) in connection with the above transfers was based upon the fact that the monies in the State Committee's account appeared to constitute commingled funds in that corporate and labor union contributions are permissible under Florida state law. Insofar as the State Committee's account has never contained commingled funds, it appears that the State Committee did not transfer prohibited funds to the Federal Committee. It is, therefore, the recommendation of the Office of the General Counsel that the Commission find no probable cause to believe the State Committee violated 2 U.S.C. § 441b(a).

With respect to the direct transfer of funds from the State Committee to the Federal Committee it is the view of this office that such transfers were nonetheless in violation of 11 C.F.R. § 102.5(a)(1)(i). The prohibition on the transfer of funds between federal and non-federal accounts is a consequence of the Commission's regulations at 11 C.F.R. § 102.5(a)(2) which provides that only the following contributions may be deposited into a federal account: those that are designated for a federal account; those that result from a solicitation which expressly states that the contribution will be used in connection with a federal election; and, those that are from contributors who are informed that all contributions are subject to the limitations and prohibitions of the Act. Although the transfers from the

State Committee were refunded by the Federal Committee, such transfers were not refunded in accordance with 11 C.F.R. § 103.3. It is, therefore, the recommendation of the Office of the General Counsel that the Commission find probable cause to believe the State Committee violated 11 C.F.R. § 102.5(a)(1)(i).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe the Seaboard System Railroad Political Action Committee - State violated 11 C.F.R. § 102.5(a)(1)(i).
2. Find no probable cause to believe the Seaboard System Railroad Political Action Committee - State violated 2 U.S.C. § 441b(a).

Date

Charles N. Steele
General Counsel

86040595104



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Jan Baran, Esquire
Wiley and Rein
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2077
Seaboard System Railroad Political
Action Committee - Federal;
Beverly Thompson, as treasurer;
Seaboard System Railroad Political
Action Committee

Dear Mr. Baran:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on August 28, 1985, found reason to believe that your clients, Seaboard System Railroad Political Action Committee-Federal, Beverly Thompson, as treasurer, and Seaboard System Railroad Political Action Committee-State, had violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that your clients violated 11 C.F.R. § 102.5(a)(1)(i), and find no probable cause to believe your clients violated 2 U.S.C. § 441b(a). The Commission may or may not approve the General Counsel's recommendations.

Submitted for your review are two briefs stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10

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Letter to Jan Baran, Esquire
Page 2

copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond 20 days.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Maura White, the staff member assigned to handle this matter, at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Briefs (2)



FEDERAL ELECTION COMMISSION

WASHINGTON, D C 20463

November 26, 1985

Jan Baran, Esquire
Wiley and Rein
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 2077
Seaboard System Railroad Political
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Beverly Thompson, as treasurer;
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After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that your clients violated 11 C.F.R. § 102.5(a)(1)(i), and find no probable cause to believe your clients violated 2 U.S.C. § 441b(a). The Commission may or may not approve the General Counsel's recommendations.

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Letter to Jan Baran, Esquire
Page 2

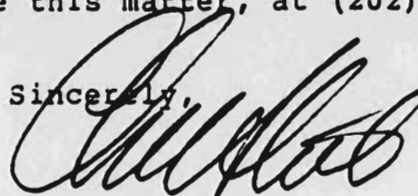
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Sincerely,



Charles N. Steele
General Counsel

Enclosures
Briefs (2)

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BEFORE THE FEDERAL ELECTION COMMISSION

Seaboard System Railroad)
Political Action Committee-State) MUR 2077

GENERAL COUNSEL'S BRIEF

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On August 28, 1985, the Commission determined that there is reason to believe the State Committee violated 11 C.F.R. § 102.5(a)(1)(i) and 2 U.S.C. § 441b(a). Notification of the Commission's finding was mailed to the State Committee on September 5, 1985. On October 9, 1985, a response to the Commission's reason to believe finding was submitted.

The response submitted by the State Committee states that "[t]he basis of the FEC's finding is the mistaken belief that transfers of funds from the state PAC to the federal PAC contained monies which were donated by corporations." The response explains that the transfers at issue "did not include any corporate monies," and that "[a]ll contributions to the state PAC are from individuals employed by Seaboard System Railroad." The response emphasizes that "the contributors to both the state PAC and the federal PAC are identical."

In support of its position the State Committee submitted copies of the reports it filed with the State of Florida covering the period of January 1, 1984, through June 30, 1985. A review of the reports has revealed that during the above period the State Committee did not accept any corporate or labor union contributions, and that the source of all of the contributions received were individuals. According to the State Committee's response, it "has never accepted donations from corporations."

Pursuant to 11 C.F.R § 102.5(a)(1)(i), an organization which finances political activity in connection with both federal and non-federal elections shall deposit into its federal account only funds subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended. In addition, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. Id.

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The record in this matter demonstrates that the State Committee made transfers totalling \$5,950 to the Federal Committee during 1984. The Commission's finding that there

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is reason to believe the State Committee violated 2 U.S.C. § 441b(a) in connection with the above transfers was based upon the fact that the monies in the State Committee's account appeared to constitute commingled funds in that corporate and labor union contributions are permissible under Florida state law. Insofar as the State Committee's account has never contained commingled funds, it appears that the State Committee did not transfer prohibited funds to the Federal Committee. It is, therefore, the recommendation of the Office of the General Counsel that the Commission find no probable cause to believe the State Committee violated 2 U.S.C. § 441b(a).

With respect to the direct transfer of funds from the State Committee to the Federal Committee it is the view of this office that such transfers were nonetheless in violation of 11 C.F.R. § 102.5(a)(1)(i). The prohibition on the transfer of funds between federal and non-federal accounts is a consequence of the Commission's regulations at 11 C.F.R. § 102.5(a)(2) which provides that only the following contributions may be deposited into a federal account: those that are designated for a federal account; those that result from a solicitation which expressly states that the contribution will be used in connection with a federal election; and, those that are from contributors who are informed that all contributions are subject to the limitations and prohibitions of the Act. Although the transfers from the

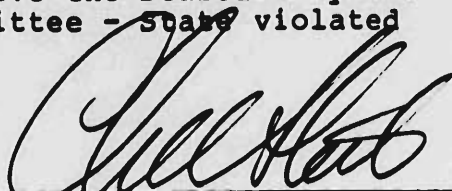
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State Committee were refunded by the Federal Committee, such transfers were not refunded in accordance with 11 C.F.R. § 103.3. It is, therefore, the recommendation of the Office of the General Counsel that the Commission find probable cause to believe the State Committee violated 11 C.F.R. § 102.5(a)(1)(i).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe the Seaboard System Railroad Political Action Committee - State violated 11 C.F.R. § 102.5(a)(1)(i).
2. Find no probable cause to believe the Seaboard System Railroad Political Action Committee - State violated 2 U.S.C. § 441b(a).

20 Nov 1985
Date


Charles N. Steele
General Counsel

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Seaboard System Railroad)
Political Action Committee-Federal;) MUR 2077
Beverly Thompson, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

The instant matter was initiated by the Federal Election Commission pursuant to information ascertained in the normal course of its supervisory responsibilities.

The 1984 March Monthly Report filed by the Seaboard System Railroad Political Action Committee-Federal ("Federal Committee") disclosed the receipt of \$2,250 on February 3, 1984, from the Seaboard System Railroad Political Action Committee-State ("State Committee").^{1/} The State Committee is the non-federal account of Seaboard System Railroad (CSX Corporation). A Request for Additional Information ("RFAI") was sent by the Reports Analysis Division ("RAD") to the Federal Committee on April 9, 1985, advising that the transfer of funds into a federal account from a non-federal account is prohibited by 11 C.F.R. § 102.5(a)(1)(i). The RFAI recommended that the Federal Committee refund the full amount of the contribution to the non-federal account.

On April 22, 1985, W. Edward Whitfield, secretary of the Federal Committee, called a staff member of RAD to discuss the RFAI dated April 9, 1985. Mr. Whitfield stated that he was not aware of the prohibition against the transfer of funds from a

1/ The Federal Committee's 1984 March Monthly Report (2-1-84 through 2-29-84) disclosed \$1,520.08 in cash-on-hand at the end of the reporting period.

non-federal account into a federal account, and that he would immediately refund \$2,250 to the non-federal account and send a copy of the refund check. In addition, Mr. Whitfield noted that the Federal Committee's response to an RFAI that was sent concerning the 30 Day Post-General Report would indicate that the Federal Committee had received another transfer of \$3,700 from the non-federal account. Mr. Whitfield stated that upon receipt of notification from the Commission he would issue a refund of \$3,700 to the non-federal account.

On April 25, 1985, the Federal Committee submitted its response to the RFAI dated April 9, 1985. The response included a copy of a check drawn on the Federal Committee's account and payable to the State Committee. The check was in the amount of \$2,250 and dated April 23, 1985. The 1985 May Monthly Report of the Federal Committee disclosed the above refund to the State Committee.

The Federal Committee's response of April 25, 1985, referenced its receipt of \$3,700 from the State Committee and noted that "[u]pon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify the transfer." On April 26, 1985, the Federal Committee submitted an amended 30 Day Post-General Report which disclosed the receipt of \$3,700 from the State Committee on November 18, 1984.^{2/} An RFAI was sent to the Federal Committee on May 8, 1985, advising that the full amount of the contribution should be

^{2/} The Federal Committee's 1984 Post-General Election Report (10-18-84 through 11-26-84) disclosed \$388.80 in cash-on-hand at the end of the reporting period.

returned to the State Committee. A second notice was sent to the Federal Committee on May 30, 1985, for failure to respond to the original RFAI. On June 17, 1985, the Federal Committee responded to the RFAI and second notice by providing a copy of a refund check dated June 11, 1985, from the Federal Committee to the State Committee in the amount of \$3,700. The Federal Committee's 1984 July Monthly Report disclosed the refund of \$3,700 to the State Committee on June 11, 1985.

On August 28, 1985, the Commission determined that there is reason to believe the Federal Committee and Beverly Thompson, as treasurer, violated 11 C.F.R. § 102.5(a)(1)(i) and 2 U.S.C. § 441b(a). Notification of the Commission's finding was mailed to the Federal Committee and Beverly Thompson, as treasurer, on September 5, 1985. On October 9, 1985, a response to the Commission's reason to believe finding was submitted.

The response submitted by the Federal Committee states that "[t]he basis of the FEC's finding is the mistaken belief that transfers of funds from the state PAC to the federal PAC contained monies which were donated by corporations." The response explains that the transfers at issue "did not include any corporate monies," and that "[a]ll contributions to the state PAC are from individuals employed by Seaboard System Railroad."

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The response emphasizes that "the contributors to both the state PAC and the federal PAC are identical."

In support of its position the Federal Committee submitted copies of the reports filed by the State Committee with the State of Florida covering the period of January 1, 1984, through June 30, 1985. A review of the reports has revealed that during the above period the State Committee did not accept any corporate or labor union contributions, and that the source of all of the contributions received were individuals. According to the Federal Committee's response, it "has never accepted donations from corporations."

Pursuant to 11 C.F.R § 102.5(a)(1)(i), an organization which finances political activity in connection with both federal and non-federal elections shall deposit into its federal account only funds subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended. In addition, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. Id.

As set forth at 2 U.S.C. § 441b(a) corporations and labor organizations are prohibited from making contributions or expenditures in connection with federal elections, and political committees are prohibited from knowingly accepting or receiving any contribution prohibited under 2 U.S.C. § 441b(a).

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The record in this matter demonstrates that the Federal Committee accepted transfers totalling \$5,950 from the State Committee during 1984. The Commission's finding that there is reason to believe the Federal Committee and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a) in connection with the above transfers was based upon the fact that the monies in the State Committee's account appeared to constitute commingled funds in that corporate and labor union contributions are permissible under Florida state law. Insofar as the State Committee's account has never contained commingled funds, it appears that the Federal Committee did not accept any funds prohibited under 2 U.S.C. § 441b(a). It is, therefore, the recommendation of the Office of the General Counsel that the Commission find no probable cause to believe the Federal Committee and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a).

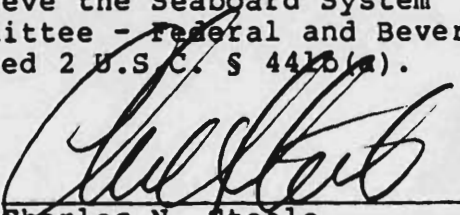
With respect to the direct transfer of funds from the State Committee to the Federal Committee it is the view of this office that such transfers were nonetheless in violation of 11 C.F.R. § 102.5(a)(1)(i). The prohibition on the transfer of funds between federal and non-federal accounts is a consequence of the Commission's regulations at 11 C.F.R. § 102.5(a)(2) which provides that only the following contributions may be deposited into a federal account: those that are designated for a federal account; those that result from a solicitation which expressly

states that the contribution will be used in connection with a federal election; and, those that are from contributors who are informed that all contributions are subject to the limitations and prohibitions of the Act. Although the transfers from the State Committee were refunded by the Federal Committee, such transfers were not refunded in accordance with 11 C.F.R. § 103.3. It is, therefore, the recommendation of the Office of the General Counsel that the Commission find probable cause to believe the Federal Committee and Beverly Thompson, as treasurer, violated 11 C.F.R. § 102.5(a)(1)(i) by accepting transfers from the State Committee.

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe the Seaboard System Railroad Political Action Committee - Federal and Beverly Thompson, as treasurer, violated 11 C.F.R. § 102.5(a)(1)(i).
2. Find no probable cause to believe the Seaboard System Railroad Political Action Committee - Federal and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a).

20 Nov 1978
Date


Charles N. Steele
General Counsel

85040595120



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel *BrnB*
DATE: November 4, 1985
SUBJECT: MUR 2077 - General Counsel's Report

The attached is submitted as an Agenda document
for the Commission Meeting of _____

Open Session _____

Closed Session _____

CIRCULATIONS

48 Hour Tally Vote []
Sensitive []
Non-Sensitive []
24 Hour No Objection []
Sensitive []
Non-Sensitive []
Information [X]
Sensitive [X]
Non-Sensitive []
Other []

DISTRIBUTION

Compliance [X]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []
Other (see distribution below) []

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSIONER SECRETARY

In the Matter of

Seaboard System Railroad
Political Action Committee - Federal;
Beverly Thompson, as treasurer;
Seaboard System Railroad Political
Action Committee - State

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MUR 2077


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GENERAL COUNSEL'S REPORT

Based upon the assessment of the information currently available, the Office of the General Counsel is prepared to close the investigation with respect to the Seaboard System Railroad Political Action Committee - Federal, Beverly Thompson, as treasurer, and the Seaboard System Railroad Political Action Committee - State.

1 November 1975
Date

BY:


Charles N. Steele
General Counsel

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WILEY & REIN

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

WRITER'S DIRECT DIAL NUMBER

(202) 429-7330

October 9, 1985

Ms. Maura White
Office of General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 2077 (Seaboard System Railroad
Political Action Committee - Federal,
et al.)

Dear Ms. White:

This office represents the respondents in the above-captioned matter. This letter is written pursuant to my meeting with you and Assistant General Counsel Lois Lerner on October 2, 1985.

On August 28, 1985 the Federal Election Commission ("FEC") found reason to believe that the respondents, the federal and state PACs of Seaboard System Railroad, had violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i). Section 441b(a) prohibits corporate contributions to a political committee which supports candidates for federal office. The basis of the FEC's finding is the mistaken belief that transfers of funds from the state PAC to the federal PAC contained monies which were donated by corporations.

As I informed you and Ms. Lerner at our meeting, the above-mentioned transfers did not include any corporate monies. All contributions to the state PAC are from individuals employed by Seaboard System Railroad. Indeed, the contributors to both the state PAC and the federal PAC are identical. For your information, I am enclosing copies of relevant reports filed by the state PAC with the State of Florida which confirm that only individuals have contributed to the state PAC.

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CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Political Committee
(Section 100.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State		2. Party N/A	
3. Candidate For: (add District, Circuit or Group) N/A		4. Address 500 Water Street	
5. City Jacksonville	6. County Duval	7. State Florida	8. Zip Code 32202

Verification By Oath or Affirmation

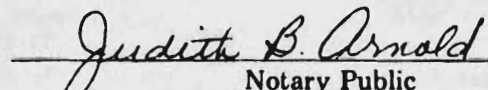
State of Florida _____ Duval _____ County

I, A. P. Woodward _____, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 17 pages of receipts and 2 pages of expenditures, upon each which I have written
my initials, covering the period of January 1, 1984 through March 31, 1984 is
complete, true and correct.



Signature of Campaign Treasurer


Subscribed and sworn to (affirmed) before me this 9th day of April A.D., 1984
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires Nov. 30, 1987
My commission expires Bonded Thru Patterson-Becht Agency, 1984
(seal)



Notary Public

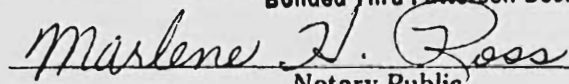
State of Florida _____ Duval _____ County

I, James C. Schultz _____, being duly sworn, depose (affirm) and say that this report
containing 17 pages of receipts and 2 pages of expenditures, upon each which I have written
my initials, covering the period of January 1, 1984 through March 31, 1984 is
complete, true and correct.



Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 9th day of April A.D., 1984
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires Bonded Thru Patterson-Becht Agency, 1984
(seal)



Notary Public

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statutes)

Report covering the period 1/1/84 through 3/31/84

Page 1 of 17 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name—Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate for NA	
3. Street Address 500 Water Street, B-4		4. City Jacksonville	5. State Florida
		6. Zip Code 32202	
SUMMARY OF CONTRIBUTIONS		Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1983 <small>*(Political Committees Only)</small>		7,425.30	
7. Contributions Previously Reported Year to Date			
8. Contributions This Report—Monetary		2,791.01	XXXXXX
9. Contributions This Report—"In-Kind"		XXXXXX	
10. Total Contributions To Date of this Report		2,791.01	

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Adams, J. I. 3769 Julington Creek Road Jacksonville, FL 32223		\$ 30.00
3/20	Adamson, J. R. 7316 Poinciana Avenue Jacksonville, FL 32217		15.00
3/20	Alderson, J. T., Jr. 3007 Tiger Hole Road Jacksonville, FL 32216		12.00
3/20	Arnold, D. J. 3463 Kildare Drive Birmingham, AL 35226		15.00
3/20	Bailey, J. K. 8605 Maidstone Court Raleigh, N. C. 27612		15.00
3/20	Bates, J. H. Route 2, Box 423-B1 Powell, TN 37849		15.00
3/20	Becker, R. C. 3434 Sara Drive Jacksonville, FL 32211		15.00
3/20	Bell, C. F. 9313 Cypress Shores Lane Jacksonville, FL 32217		18.00

15. Campaign Treasurer's Initials 	16. Candidate or Chairman's Initials
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CAMPAIGN TREASURER'S REPORT--CONTRIBUTIONS -- Continued

Report covering the period of 1/1/84 through 3/31/84

Page 2 of 17 Pages

1. Name--Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Bitter, D. H. 1822 Selva Grande Drive Atlantic Beach, FL 32233		\$ 25.50
3/20	Blaes, E. J. 1010 Talley Road Chattanooga, TN 37411		15.00
3/20	Bond, R. L. 3100 Warren Court Glen Allen, VA 23060		7.50
3/20	Bozard, J. D. 2474 Boquette Avenue Jacksonville, FL 32217		12.49
3/20	Brooks, H. L., Jr. 4159 Churchwell Road Jacksonville, FL 32210		25.50
3/20	Bullard, R. L. 4705 Wadham Lane Jacksonville, FL 32210		25.01
3/20	Burton, C. J., Jr. Station Court, Lot 62 P. O. Box 57 Brooks, KY 40109		15.00
3/20	Busby, G. W. 400 Tallapoosa Street Montgomery, AL 36104		7.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 1/1/84 through 3/31/84

Page 3 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Casey, S. B. 8000 Baymeadows Circle, E., Apt. 1 Jacksonville, FL 32216		\$ 30.00
3/20	Cash, T. B. 7210 White Birch Drive Jacksonville, FL 32211		18.00
3/20	Charron, E. A. 13877 Pleasant Valley Drive Jacksonville, FL 32225		30.00
3/20	Chick, G. F. 4455 Confederate Point Road, 6K Jacksonville, FL 32210		15.00
3/20	Christon, C. 12318 Muscovy Drive Jacksonville, FL 32223		25.50
3/20	Cole, Emried D., Jr. 11354 Oak Landings Drive Jacksonville, FL 32225		12.50
3/20	Cole, Wandaleen P. 11354 Oak Landings Drive Jacksonville, FL 32225		12.49
3/20	Cooper, Jack M. 7987 Hunter Grove Road Jacksonville, FL 32216		15.00

15. Campaign Treasurer's Initials

APN

16. Candidate or Chairman's Initials

JCS

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CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 1/1/84 through 3/31/84

Page 4 of 17 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Councill, R. J. 3126 Bridlewood Lane Jacksonville, FL 32217		\$ 7.50
3/20	Cremins, J. S. 8905 River Road Richmond, VA 23229		15.00
3/20	Crowe, J. L. 1239 Montevideo Road Jacksonville, FL 32216		30.00
3/20	Currier, L. F. 1927 Selva Marine Drive Atlantic Beach, FL 32233		25.50
3/20	Davis, J. C. 1601 Booth Street Waycross, GA 31501		4.50
3/20	Downes, T. A., Jr. 28 Old Brick Road New City, New York 10956		7.50
3/20	Dufford, K. C. 2212 Miller Oaks Court Jacksonville, FL 32217		25.50
3/20	Dumestre, M. J. 411 Cumberland Avenue Gulf Breeze, FL 32561		7.50

15. Campaign Treasurer's Initials

APZL

16. Candidate or Chairman's Initials

Jee

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CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 1/1/84 through 3/31/84Page 5 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Duvall, R. L., Jr. 7827 Hunters Grove Road Jacksonville, FL 32216		\$ 25.00
3/20	Edel, E. E. 8915 Rearden Road Richmond, Virginia 23229		37.50
3/20	Englert, E. R. 3256 Riverside Avenue Jacksonville, FL 32205		25.50
3/20	Frame, R. E. 2839 Wood Valley Court Jacksonville, FL 32217		15.00
3/20	Fryar, J. H., Jr. 2279 Seminole Beach Road Atlantic Beach, FL 32233		15.00
3/20	Fuson, J. F. 1204 Jamaica Court Jacksonville, FL 32216		22.50
3/20	Galbreath, L. L. 1169 Morgan Circle, E. Orange Park, FL 32073		3.00
3/20	Gremillion, R. J. 3506 Pirogue Road Jeffersontown, KY 40299		6.00

15. Campaign Treasurer's Initials

CPH

16. Candidate or Chairman's Initials

JS

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 1/1/84 through 3/31/84

Page 6 of 17 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Haines, W. E. 2775 Sunnybrook Road Jacksonville, FL 32216		\$ 7.50
3/20	Hamilton, R. H. 8953 Chiswick Court Jacksonville, FL 32217		18.50
3/20	Harvin, H. W. 7106 Arlet Drive Jacksonville, FL 32211		15.00
3/20	Haulter, Robert J. 2574 Oakview Drive Jacksonville, FL 32216		25.50
3/20	Hawkins, R. F. 308 Dobbin Road Webster Grove, Mo. 63119		18.00
3/20	Helms, J.D.H., Jr. 1231 Lamanto Avenue, E. Jacksonville, FL 32211		7.50
3/20	Hemphill, D. W. 4717 Avon Lane Jacksonville, FL 32210		7.50
3/20	Hensley, W. T. 8470 San Clemente Drive Jacksonville, FL 32217		7.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 1/1/84 through 3/31/84

Page 7 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Herde, E. W. 3948 Hickory Grove Drive Jacksonville, FL 32211		\$ 30.00
3/20	Hesler, W. D. 5752 Wilcrest Circle, S. Jacksonville, FL 32211		25.50
3/20	Holcomb, E. E. 11308 Beacon Drive Jacksonville, FL 32225		30.00
3/20	Huband, G. E. 1252 Campbell Circle Jacksonville, FL 32207		15.00
3/20	Hyers, K. K. 5417 Cary Street Richmond, VA 23226		30.00
3/20	Ingoldsby, J. H. 4317 Sage Oak Court Jacksonville, FL 32211		19.50
3/20	Ingram, C. J. 5224 Robert Scott Drive, S. Jacksonville, FL 32207		16.50
3/20	Jameson, M. L. 6119 Sack Drive, N. Jacksonville, FL 32216		12.00

15. Campaign Treasurer's Initials

CPH

16. Candidate or Chairman's Initials

JS

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CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 1/1/84 through 3/31/84

Page 8 of 17 Pages

1. Name - Candidate or Committee

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Janowski, M. D. 3516 Compass Rose Drive, E. Jacksonville, FL 32216		\$ 25.50
3/20	Johnson, S. R. 3931 Lochlaurel Drive Jacksonville, FL 32211		30.00
3/20	Johnson, V. R., Jr. 48 Hialeah Drive Orange Park, FL 32073		7.50
3/20	Jones, A. C., Jr. 2861 Spanish Cove Trail Jacksonville, FL 32217		37.50
3/20	Kidd, E. L. 1806 Ormond Road Jacksonville, FL 32211		16.50
3/20	Kiesler, J. L. 7843 Bellemeade Blvd., S. Jacksonville, FL 32211		25.50
3/20	Kopicki, R. J. 1023 Holly Lane Jacksonville, FL 32207		30.00
3/20	Kreitzman, D. O. 8032 Jaguar Drive Jacksonville, FL 32210		15.00

15. Campaign Treasurer's Initials

APW

16. Candidate or Chairman's Initials

JCS

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 1/1/84 through 3/31/84

Page 9 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Kuhn, D. B. 3201 Hidden Lake Drive, E. Jacksonville, FL 32216		\$ 15.00
3/20	Lanier, H. A. 7061 Old Kings Road, S., No. 95 Jacksonville, FL 32217		10.50
3/20	Laws, E. S. 3894 University Club Boulevard Jacksonville, FL 32211		7.50
3/20	Leddon, C. D. 4323 Fern Creek Drive Jacksonville, FL 32211		37.50
3/20	Lee, H. W. 410 Booth Street Callahan, FL 32011		3.00
3/20	Liggett, R. D. 10132 Deerwood Club Drive Jacksonville, FL 32216		37.50
3/20	Lockamy, A. R. 507 Sycamore Shoals Louisville, KY 40223		25.12
3/20	Logan, G. S. 2704 W. Ivywood Road Florence, S. C. 29501		7.50

15. Campaign Treasurer's Initials

[Signature]

16. Candidate or Chairman's Initials

[Signature]

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 1/1 through 3/31/84Page 10 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Lucas, A. J., Jr. 4 Ponte Vedra Circle Ponte Vedra Beach, FL 32082		\$ 7.50
3/20	Ludwig, K. J 1068 Cherry Street Jacksonville, FL 32205		15.00
3/20	McConnell, T. O. 225 11th Street Atlantic Beach, FL 32233		30.00
3/20	McCormack, W. C. 1081 Arbor Lane Jacksonville, FL 32207		18.75
3/20	McNeil, G. M. 1714 Damon Drive Florence, S.C. 29501		22.50
3/20	Meadow, C. D. 3916 Mamarneck Road Louisville. KY 40218		6.00
3/20	Mercado, B. D. 1105 Knoll Drive, West Jacksonville, FL 32205		4.50
3/20	Mervine, C. E., Jr. 923 Point LaVista Rd Jacksonville, FL 32207		33.00
15. Campaign Treasurer's Initials <i>ABT</i>		16. Candidate or Chairman's Initials <i>JCR</i>	

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 1/1/84 through 3/31/84

Page 11 of 17 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Minter, A. W. 4905 Lofty Pines Circle, W Jacksonville, FL 32210		\$ 25.50
3/20	Moore, G. H., Jr. 8880 Old Kings Road, S., Apt. 92 Jacksonville, FL 32217		25.50
3/20	Mott, G. B. 848 Cedar Street Jacksonville, FL 32207		30.00
3/20	Nesmith, B. N., Jr. 2618 Kingston Drive Florence, S.C. 29501		15.00
3/20	Nicol, R. M. 3918 Tara Hall Drive Jacksonville, FL 32211		45.00
3/20	Pair, J. R. 3602 Kiki Court Louisville, KY 40219		15.00
3/20	Parker, B. L. 5366 Margaret Street Orange Park, FL 32073		3.00
3/20	Phillips, B. S. 6165 Briarforest Road, N. Jacksonville, FL 32211		7.50

15. Campaign Treasurer's Initials

APB

16. Candidate or Chairman's Initials

Jes

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 1/1/84 through 3/31/84

Page 12 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Phillips, R. W. 6165 Briarforest Road, N. Jacksonville, FL 32211		\$ 7.50
3/20	Pierce, W. E., Jr. 8252 Haverhill Street Jacksonville, FL 32211		12.00
3/20	Poole, C. D. 1208 Catalina Road, E. Jacksonville, FL 32216		30.00
3/20	Price, W. M. 632 E. Street, S.E. Washington, D. C. 20003		45.00
3/20	Prince, B. T. 6312 Long Meadow Road Charlotte, N.C. 28210		15.00
3/20	Pursley, F. E. 2737 Christopher Creek Road, N. Jacksonville, FL 32217		25.50
3/20	Ramseur, D. H. 3940 Marianna Road Jacksonville, FL 32217		7.50
3/20	Reeves, W. M., Jr. 4357 Heaven Trees Road Jacksonville, FL 32207		15.00

15. Campaign Treasurer's Initials

ABL

16. Candidate or Chairman's Initials

JCS

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 1/1/84 through 3/31/84

Page 13 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Renfroe, W. W., Jr. 8605 Perry Road Louisville, KY 40222		\$ 22.50
3/20	Reynolds, George M. 631 Nantucket Court Walnut Creek, CA 94598		21.00
3/20	Reynolds, J. L., Jr. 1111 Oak Vale Drive Jacksonville, FL 32217		7.50
3/20	Rice, J. T. 1471 Satsuma Road Jacksonville, FL 32223		7.50
3/20	Samuels, F. N. 202 Lanark Dell Louisville, KY 40243		8.50
3/20	Smith, Gary W. 421 Kaelin Drive Louisville, KY 40207		15.00
3/20	Smith, T. L. 7945 Pine Lake Road Jacksonville, FL 32216		25.50
3/20	Spencer, P. L. 8839 Heavengate Lane Jacksonville, FL 32217		1.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 1/1/84 through 3/31/84

Page 14 of 17 Pages

7. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Summers, J. R. 3500 University Blvd., N., Apt. 1103 Jacksonville, FL 32211		\$ 7.50
3/20	Swani, P. 9435 Lita Road Jacksonville, FL 32217		4.50
3/20	Talley, B. E. 714 Clearview Madisonville, KY 42431		15.00
3/20	Tapp, J. D., Jr. 1132 Carlotta Road, W. Jacksonville, FL 32211		15.00
3/20	Taylor, H. L. 1209 I Beacon Parkway, E. Birmingham, AL 35209		15.00
3/20	Thomas, J. W. 645 Spruce Street Erwin, Tennessee 37650		30.00
3/20	Thornton, W. A. 2465 Lofberg Drive Jacksonville, FL 32216		30.00
3/20	Tichenor, R. R. 9204 Trenta Lane Fern Creek, KY 40291		15.00

15. Campaign Treasurer's Initials

CPJ

16. Candidate or Chairman's Initials

JCS

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 1/1/84 through 3/31/84

Page 15 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Tillis, E. E. 410 Tweed Avenue Seffner, FL 33584		\$ 15.00
3/20	Torbett, A. P. 926 Sandalwood Drive Richardson, Texas 75080		7.50
3/20	Turknett, Norris D. 4671 Blount Avenue Jacksonville, FL 32210		7.50
3/20	Vaughan, J. H. Route 1, Box 365-D Midland, N.C. 28107		15.00
3/20	Vaught, W. H. Route 4, Box 263 Floyds Knobs, IN 47119		15.00
3/20	Villademoros, S. 2535 Rogero Road Jacksonville, FL 32211		7.50
3/20	Ward, K. C. 556 Lake Road Ponte Vedra Beach, FL 32082		25.50
3/20	Watson, S. T. 831 Park Avenue Florence, S.C. 29501		12.00

15. Campaign Treasurer's Initials

[Signature]

16. Candidate or Chairman's Initials

[Signature]

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 1/1/84 through 3/31/84

Page 16 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/20	Weas, L. J. 7921 Jamaica Road, N. Jacksonville, FL 32216		\$ 26.25
3/20	Webster, R. J. 601 Wimbleton Court, #3 Louisville, KY 40218		15.00
3/20	White, H. G. 3262 Fruitwood Lane Jacksonville, FL 32211		30.00
3/20	White, J. M. 4385 Phillips Place Jacksonville, FL 32207		30.00
3/20	Whitfield, W. E. 500 Water Street Jacksonville, FL 32202		15.00
3/20	Widner, Larry E. 4038 Sabel Drive Jacksonville, FL 32211		7.50
3/20	Williams, J. E. 730 Bordeaux Avenue, W. Jacksonville, FL 32211		25.50
3/20	Wodehouse, C.J.O., Jr. 4116 Ponte Vedra Blvd. Jacksonville Beach, FL 32250		25.01

15. Campaign Treasurer's Initials

ADL

16. Candidate or Chairman's Initials

JCS

25040525140

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 1/1/84 through 3/31/84

Page 17 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
	Youngblood, J. L. 11864 Mandarin Forest Drive Jacksonville, FL 32223		\$ 15.00
1/18	Rice, L. R. 1471 Satsuma Road Jacksonville, FL 32223		8.50
3/9	Schultz, J. C. 903 Oriental Gardens Road Jacksonville, FL 32207		175.00
2/17	Holaway, C. W. 509 Rutile Drive Ponte Vedra Beach, FL 32082		50.00
Jan. Feb. Mar.	Checking Account Interest		94.89
1/3	Refund of Arthur Payne Contribution Check 149 dated 10/28/83 2825 2nd Street, N.W. Birmingham, Alabama 35215		50.00
1/18	Refund of Mary Sue Terry Contribution Check 524 dated 9/27/82 P. O. Drawer 369 Stuart, Virginia 24171		100.00

15. Campaign Treasurer's Initials

DS-DE 13-1 (9-81)

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT EXPENDITURES


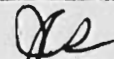
(Section 108.07(4) Florida Statutes)

Report covering the period of 1/1/84 through 3/31/84 Page 1 of 2 Pages

Instructions -- Complete information in Items 1 through 15. In Item 11, Expenditure Information, enter full name and address of each person to whom expenditures have been made, the amount, date and purpose of each expenditure. Items 14 and 15 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right hand corner.

1. Name--Candidate or Committee Committee-State Seaboard System Railroad Political Action		2. Candidate For N/A	
3. Street Address 500 Water Street	4. City Jacksonville	5. State Florida	6. Zip Code 32202
7. Expenditures Previously Reported			\$
8. Expenditures This Report			\$ 4,625.00
9. Total Expenditures To Date of This Report (line 7 and 8)			\$ 4,625.00

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
1/25	Committee to Reelect Clinton Miller P. O. Box 484 Woodstock, Virginia 22664	Primary Election	\$ 50.00
2/15	Committee to Reelect Marion Gressette Box 346 St. Matthews, SC 29135 (NOTE: This check will be shown as refunded in our 2nd Qtr Report due to his death)	Primary Election	1,000.00
3/5	Senate-House Democratic Caucus 19 Legislative Plaza Nashville, TN 37219	Tennessee Caucus	600.00
3/5	House Republican Caucus 103 War Memorial Building Nashville, TN 37219	Tennessee Caucus	300.00
3/5	Senate Republican Caucus 313 War Memorial Building Nashville, TN 37219	Tennessee Caucus	300.00
2/3	SBD-PAC Federal 500 Water Street Jacksonville, FL 32202	Transfer of Funds from State to Federal PAC	2,250.00

14. Campaign Treasurer's Initials 	15. Candidate or Chairman's Initials 
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CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Political Committee
(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State		2. Party N/A	
3. Candidate For: (add District, Circuit or Group) N/A		4. Address 500 Water Street (B-4)	
5. City Jacksonville	6. County Duval	7. State Florida	8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida _____ Duval _____ County

I, A. P. Woodward _____, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 17 pages of receipts and 9 pages of expenditures, upon each which I have written
my initials, covering the period of April 1, 1984 through June 30, 1984 is
complete, true and correct.

A. P. Woodward
Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 10th day of July A.D., 1984
(seal) My commission expires Nov. 30, 1987
NOTARY PUBLIC, STATE OF FLORIDA
Bonded Thru Patterson-Recht Agency

Judith B. Arnold
Notary Public

State of Florida _____ Duval _____ County

I, James C. Schultz _____, being duly sworn, depose (affirm) and say that this report
containing 17 pages of receipts and 9 pages of expenditures, upon each which I have written
my initials, covering the period of April 1, 1984 through June 30, 1984 is
complete, true and correct.

James C. Schultz
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 11th day of JULY A.D., 1984
(seal) My commission expires Nov. 30, 1987
NOTARY PUBLIC, STATE OF FLORIDA
Bonded Thru Patterson-Recht Agency

Marlene H. Ross
Notary Public

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

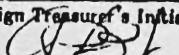

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statutes)

Report covering the period 4/1/84 through 6/30/84

Page 1 of 17 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name—Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate for NA	
3. Street Address 500 Water Street, B-4		4. City Jacksonville	5. State Florida
		6. Zip Code 32202	
SUMMARY OF CONTRIBUTIONS		Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1982 <small>*(Political Committees Only)</small>			
7. Contributions Previously Reported Year to Date		\$2,791.01	
8. Contributions This Report—Monetary		3,421.91	XXXXXX
9. Contributions This Report—"In-Kind"		XXXXXX	
10. Total Contributions To Date of this Report		6,212.92	
11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Adams, J. I. 3769 Julington Creek Road Jacksonville, FL 32223		\$ 30.00
6/20	Adamson, J. R. 7316 Poinciana Avenue Jacksonville, FL 32217		15.00
6/20	Alderson, J. T., Jr. 3007 Tiger Hole Road Jacksonville, FL 32216		12.00
6/20	Arnold, D. J. 3463 Kildare Drive Birmingham, AL 35226		15.00
6/20	Bailey, J. K. 8605 Maidstone Court Raleigh, N. C. 27612		15.00
6/20	Bates, J. H. Route 2, Box 423-B1 Powell, TN 37849		15.00
6/20	Becker, R. C. 3434 Sara Drive Jacksonville, FL 32211		15.00
6/20	Bell, C. F. 9313 Cypress Shores Lane Jacksonville, FL 32217		18.00
15. Campaign Treasurer's Initials 		16. Candidate's or Chairman's Initials 	

CAMPAIGN TREASURER REPORT - CONTRIBUTIONS - Continued

Report covering the period of 4/1/84 through 6/30/84

Page 2 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Bitter, D. H. 1822 Selva Grande Drive Atlantic Beach, FL 32233		\$ 25.50
6/20	Blaes, E. J. 1010 Talley Road Chattanooga, TN 37411		15.00
6/20	Bond, R. L. 3100 Warren Court Glen Allen, VA 23060		7.50
6/20	Bozard, J. D. 2474 Boquette Avenue Jacksonville, FL 32217		12.50
6/20	Brooks, H. L., Jr. 4159 Churchwell Road Jacksonville, FL 32210		25.50
6/20	Bullard, R. L. 4705 Wadham Lane Jacksonville, FL 32210		25.00
6/20	Burton, C. J., Jr. Station Court, Lot 62 P. O. Box 57 Brooks, KY 40109		15.00
6/20	Busby, G. W. 400 Tallapoosa Street Montgomery, AL 36104		7.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

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CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 3 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Casey, S. B. 8000 Baymeadows Circle, E., Apt. 1 Jacksonville, FL 32216		\$ 30.00
6/20	Cash, T. B. 7210 White Birch Drive Jacksonville, FL 32211		18.00
6/20	Charron, E. A. 13877 Pleasant Valley Drive Jacksonville, FL 32225		30.00
6/20	Chick, G. F. 4455 Confederate Point Road, 6K Jacksonville, FL 32210		15.00
6/20	Christon, C. 12318 Muscovy Drive Jacksonville, FL 32223		25.50
6/20	Cole, Emried D., Jr. 11354 Oak Landings Drive Jacksonville, FL 32225		12.50
6/20	Cole, Wandaleen P. 11354 Oak Landings Drive Jacksonville, FL 32225		12.49
6/20	Cooper, Jack M. 7987 Hunter Grove Road Jacksonville, FL 32216		15.00

15. Campaign Treasurer's Initials

DBL

16. Candidate or Chairman's Initials

JMS

86040595147

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 4/1/84 through 6/30/84

Page 4 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Councill, R. J. 3126 Bridlewood Lane Jacksonville, FL 32217		\$ 7.50
6/20	Crowe, J. L. 1239 Montevideo Road Jacksonville, FL 32216		30.00
6/20	Currier, L. F. 1927 Selva Marine Drive Atlantic Beach, FL 32233		25.50
6/20	Davis, J. C. 1601 Booth Street Waycross, GA 31501		4.50
6/20	Downes, T. A., Jr. 28 Old Brick Road New City, New York 10956		7.50
6/20	Dufford, K. C. 2212 Miller Oaks Court Jacksonville, FL 32217		25.50
6/20	Dumestre, M. J. 411 Cumberland Avenue Gulf Breeze, FL 32561		7.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

86040595148

CAMPAIGN TREASURER REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 4/1/84 through 6/30/84

Page 5 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Duvall, R. L., Jr. 7827 Hunters Grove Road Jacksonville, FL 32216		\$ 8.33
6/20	Edel, E. E. 8915 Rearden Road Richmond, Virginia 23229		37.50
6/20	Englert, E. R. 3256 Riverside Avenue Jacksonville, FL 32205		25.50
6/20	Frame, R. E. 2839 Wood Valley Court Jacksonville, FL 32217		15.00
6/20	Fryar, J. H., Jr. 2279 Seminole Beach Road Atlantic Beach, FL 32233		15.00
6/20	Fuson, J. F. 1204 Jamaica Court Jacksonville, FL 32216		22.50
6/20	Galbreath, L. L. 1169 Morgan Circle, E. Orange Park, FL 32073		3.00
6/20	Gremillion, R. J. 3506 Pirogue Road Jeffersontown, KY 40299		6.00

15. Campaign Treasurer's Initials

[Signature]

16. Candidate or Chairman's Initials

[Signature]

86040595149

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continue

Report covering the period of 4/1/84 through 6/30/84

Page 6 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Haines, W. E. 2775 Sunnybrook Road Jacksonville, FL 32216		\$ 7.50
6/20	Hamilton, R. H. 8953 Chiswick Court Jacksonville, FL 32217		25.50
6/20	Harvin, H. W. 7106 Arlet Drive Jacksonville, FL 32211		15.00
6/20	Haulter, Robert J. 2574 Oakview Drive Jacksonville, FL 32216		25.50
6/20	Hawkins, R. F. 308 Dobbin Road Webster Grove, Mo. 63119		18.00
6/20	Helms, J.D.H., Jr. 1231 Lamanto Avenue, E. Jacksonville, FL 32211		7.50
6/20	Hemphill, D. W. 4717 Avon Lane Jacksonville, FL 32210		7.50
6/20	Hensley, W. T. 8470 San Clemente Drive Jacksonville, FL 32217		7.50
15. Campaign Treasurer's Initials <i>[Signature]</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 7 of 17 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Herde, E. W. 3948 Hickory Grove Drive Jacksonville, FL 32211		\$ 30.00
6/20	Hesler, W. D. 5752 Wilcrest Circle, S. Jacksonville, FL 32211		25.50
6/20	Holcomb, E. E. 11308 Beacon Drive Jacksonville, FL 32225		30.00
6/20	Huband, G. E. 1252 Campbell Circle Jacksonville, FL 32207		15.00
6/20	Hyers, K. K. 5417 Cary Street Richmond, VA 23226		30.00
6/20	Ingoldsby, J. H. 4317 Sage Oak Court Jacksonville, FL 32211		19.50
6/20	Ingram, C. J. 5224 Robert Scott Drive, S. Jacksonville, FL 32207		16.50
6/20	Jameson, M. L. 6119 Sack Drive, N. Jacksonville, FL 32216		12.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 8 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Janowski, M. D. 3516 Compass Rose Drive, E. Jacksonville, FL 32216		\$ 25.50
6/20	Johnson, S. R. 3931 Lochlaurel Drive Jacksonville, FL 32211		30.00
6/20	Johnson, V. R., Jr. 48 Hialeah Drive Orange Park, FL 32073		7.50
6/20	Jones, A. C., Jr. 2861 Spanish Cove Trail Jacksonville, FL 32217		37.50
6/20	Kidd, E. L. 1806 Ormond Road Jacksonville, FL 32211		16.50
6/20	Kiesler, J. L. 7843 Bellemeade Blvd., S. Jacksonville, FL 32211		25.50
6/20	Kopicki, R. J. 1023 Holly Lane Jacksonville, FL 32207		30.00
6/20	Kreitzman, D. O. 8032 Jaguar Drive Jacksonville, FL 32210		15.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

86040595152

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 9 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Kuhn, D. B. 3201 Hidden Lake Drive, E. Jacksonville, FL 32216		\$ 15.00
6/20	Lanier, H. A. 7061 Old Kings Road, S., No. 95 Jacksonville, FL 32217		10.50
6/20	Laws, E. S. 3894 University Club Boulevard Jacksonville, FL 32211		7.50
6/20	Leddon, C. D. 4323 Fern Creek Drive Jacksonville, FL 32211		37.50
6/20	Lee, H. W. 410 Booth Street Callahan, FL 32011		3.00
6/20	Liggett, R. D. 10132 Deerwood Club Drive Jacksonville, FL 32216		37.50
6/20	Lockamy, A. R. 507 Sycamore Shoals Louisville, KY 40223		25.12
6/20	Logan, G. S. 2704 W. Ivywood Road Florence, S. C. 29501		7.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84Page 10 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Lucas, A. J., Jr. 4 Ponte Vedra Circle Ponte Vedra Beach, FL 32082		\$ 7.50
6/20	Ludwig, K. J 1068 Cherry Street Jacksonville, FL 32205		15.00
6/20	McConnell, T. O. 225 11th Street Atlantic Beach, FL 32233		30.00
6/20	McCormack, W. C. 1081 Arbor Lane Jacksonville, FL 32207		18.75
6/20	McNeill, G. M. 1714 Damon Drive Florence, S.C. 29501		22.50
6/20	Meadow, C. D. 3916 Mamarneck Road Louisville, KY 40218		6.00
6/20	Mercado, B. D. 1105 Knoll Drive, West Jacksonville, FL 32205		4.50
6/20	Mervine, C. E., Jr. 923 Point LaVista Rd Jacksonville, FL 32207		11.00
15. Campaign Treasurer's Initials <i>[Signature]</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

86040595154

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 11 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Minter, A. W. 4905 Lofty Pines Circle, W Jacksonville, FL 32210		\$ 25.50
6/20	Moore, G. H., Jr. 8880 Old Kings Road, S., Apt. 92 Jacksonville, FL 32217		25.50
6/20	Mott, G. B. 848 Cedar Street Jacksonville, FL 32207		30.00
6/20	Nesmith, B. N., Jr. 2618 Kingston Drive Florence, S.C. 29501		15.00
5/20	Nicol, R. M. 3918 Tara Hall Drive Jacksonville, FL 32211		45.00
6/20	Pair, J. R. 3602 Kiki Court Louisville, KY 40219		15.00
6/20	Parker, B. L. 5366 Margaret Street Orange Park, FL 32073		3.00
6/20	Phillips, B. S. 6165 Briarforest Road, N. Jacksonville, FL 32211		7.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84Page 12 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Phillips, R. W. 6165 Briarforest Road, N. Jacksonville, FL 32211		\$ 7.50
6/20	Pierce, W. E., Jr. 8252 Haverhill Street Jacksonville, FL 32211		12.00
6/20	Poole, C. D. 1208 Catalina Road, E. Jacksonville, FL 32216		30. 0
6/20	Price, W. M. 632 E. Street, S.E. Washington, D. C. 20003		45.00
6/20	Prince, B. T. 6312 Long Meadow Road Charlotte, N.C. 28210		15.00
6/20	Pursley, F. E. 2737 Christopher Creek Road, N. Jacksonville, FL 32217		25.50
6/20	Ramseur, D. H. 3940 Marianna Road Jacksonville, FL 32217		7.50
6/20	Reeves, W. M., Jr. 4357 Heaven Trees Road Jacksonville, FL 32207		15.00
15. Campaign Treasurer's Initials <i>[Signature]</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84 ...

Page 13 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Renfroe, W. W., Jr. 8605 Perry Road Louisville, KY 40222		\$ 22.50
6/20	Reynolds, George M. 631 Nantucket Court Walnut Creek, CA 94598		21.00
6/20	Reynolds, J. L., Jr. 1111 Oak Vale Drive Jacksonville, FL 32217		7.50
6/20	Rice, J. T. 1471 Satsuma Road Jacksonville, FL 32223		7.50
6/20	Samuels, F. N. 202 Lanark Dell Louisville, KY 40243		1.50
6/20	Smith, Gary W. 421 Kaelin Drive Louisville, KY 40207		15.00
6/20	Smith, T. L. 7945 Pine Lake Road Jacksonville, FL 32216		25.50
6/20	Spencer, P. L. 8839 Heavengate Lane Jacksonville, FL 32217		1.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

86040595157

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84Page 14 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Summers, J. R. 3500 University Blvd., N., Apt. 1103 Jacksonville, FL 32211		\$ 7.50
6/20	Swani, P. 9435 Lita Road Jacksonville, FL 32217		4.50
6/20	Talley, B. E. 714 Clearview Madisonville, KY 42431		15.00
6/20	Tapp, J. D., Jr. 1132 Carlotta Road, W. Jacksonville, FL 32211		15.00
6/20	Taylor, H. L. 1209 I Beacon Parkway, E. Birmingham, AL 35209		5.00
6/20	Thomas, J. W. 645 Spruce Street Erwin, Tennessee 37650		30.00
6/20	Thornton, W. A. 2465 Lofberg Drive Jacksonville, FL 32216		30.00
6/20	Tichenor, R. R. 9204 Trenta Lane Fern Creek, KY 40291		15.00
15. Campaign Treasurer's Initials <i>GB</i>		16. Candidate or Chairman's Initials <i>JS</i>	

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 15 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Tillis, E. E. 410 Tweed Avenue Seffner, FL 33584		\$ 15.00
6/20	Torbett, A. P. 926 Sandalwood Drive Richardson, Texas 75080		7.50
6/20	Turknett, Norris D. 4671 Blount Avenue Jacksonville, FL 32210		7.50
6/20	Vaughan, J. H. Route 1, Box 365-D Midland, N.C. 28107		15.00
6/20	Vaught, W. H. Route 4, Box 263 Floyds Knobs, IN 47119		15.00
6/20	Villademoros, S. 2535 Rogero Road Jacksonville, FL 32211		7.50
6/20	Ward, K. C. 556 Lake Road Ponte Vedra Beach, FL 32082		25.50
6/20	Watson, S. T. 831 Park Avenue Florence, S.C. 29501		12.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

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CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 16 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Weas, L. J. 7921 Jamaica Road, N. Jacksonville, FL 32216		\$ 26.25
6/20	White, H. G. 3262 Fruitwood Lane Jacksonville, FL 32211		30.00
6/20	White, J. M. 4385 Phillips Place Jacksonville, FL 32207		30.00
6/20	Whitfield, W. E. 500 Water Street Jacksonville, FL 32202		15.00
6/20	Widner, Larry E. 4038 Sabel Drive Jacksonville, FL 32211		7.50
6/20	Williams, J. E. 730 Bordeau Avenue, W. Jacksonville, FL 32211		25.50
6/20	Wodehouse, C.J.O., Jr. 4116 Ponte Vedra Blvd. Jacksonville Beach, FL 32250		25.01

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT--CONTRIBUTIONS -- Continued

Report covering the period of 4/1/84 through 6/30/84

Page 17 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
6/20	Youngblood, J. L. 11864 Mandarin Forest Drive Jacksonville, FL 32223		\$ 15.00
5/14	Check returned because of death of candidate Committee to Reelect Senator Marion Check #171 drawn Feb. 15, 1984 Gressette		1,000.00
5/29	Richardson, H. E. 6803 Clifton Forge Road Jacksonville, FL 32211		100.00
Apr. May June	Checking Account Interest		87.95
15. Campaign Treasurer's Initials <i>YBL</i>		16. Candidate or Chairman's Initials <i>JS</i>	

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CAMPAIGN TREASURER'S REPORT EXPENDITURES

(Section 106.07(4) Florida Statutes)

Report covering the period of 4/1/84 through 6/30/84 Page 1 of 9 Pages

Instructions — Complete information in Items 1 through 15. In Item 11, Expenditure Information, enter full name and address of each person to whom expenditures have been made, the amount, date and purpose of each expenditure. Items 14 and 15 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right hand corner.

1. Name—Candidate or Committee Committee-State Seaboard System Railroad Political Action		2. Candidate For N/A	
3. Street Address 500 Water Street	4. City Jacksonville	5. State FL	6. Zip Code 32202
7. Expenditures Previously Reported, Year to Date			\$ 4,625.00
8. Expenditures This Report			\$ 7,725.00
9. Total Expenditures To Date of This Report (line 7 and 8)			\$ 12,350.00

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
5/1	Cross for Senate Committee Route 2, Box 149 Hanover, VA 23069	General Election	\$ 100.00
5/1	Committee to Elect Donald J. Blanford Route 1, King Road Philpot, KY 42366	Primary Election	300.00
5/1	Committee to Elect James R. Dunn 5009 Maryman Road Pleasure Ridge Park, KY 40258	Primary Election	300.00
5/1	Committee to Elect Roy Joe Head RR 2 Providence, KY 42450	Primary Election	300.00
5/1	Committee to Elect Caroline White 229 School Street Barbourville, KY 40996	Primary Election	200.00
5/1	Campaign Committee of Dolly McNutt 105 Country Club Lane Paducah, KY 42001	Primary Election	200.00
14. Campaign Treasurer's Initials <i>[Signature]</i>		15. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT—EXPENDITURES — Continued
 Report covering the period of 4/1/84 through 6/30/84

Page 2 of 9 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
5/1	Committee to Elect Gary White 2826 S. 18th Street Homewood, AL 35204	Primary Election	\$ 100.00
5/1	Committee to Elect Ned McWherter Cedar Street Dresden, TN 38225	Primary Election	500.00
6/18	Committee to Reelect John Wilder Route 2 Mason, TN 38049	Primary Election	100.00
6/18	Committee to Reelect Ben Atchley 6324 Bowstring Trail Knoxville, TN 37920	Primary Election	100.00
6/18	Committee to Reelect Steve Cohen 178 S. McLean #1 Memphis, TN 38104	Primary Election	100.00
6/18	Committee to Reelect Riley Darnell 603 Waterloo Drive Clarksville, TN 37040	Primary Election	100.00
6/18	Committee to Reelect Leonard Dunavant 4625 Cedar Rose Drive Millington, TN 38053	Primary Election	100.00
6/18	Committee to Reelect Milton Hamilton Route 1, Box 204-A Union City, TN 38261	Primary Election	100.00

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—EXPENDITURES — Continued
 Report covering the period of 4/1/84 through 6/30/84

Page 3 of 9 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
6/18	Committee to Reelect John Hicks 2820 Windemere Drive Nashville, TN 37214	Primary Election	\$ 100.00
6/18	Committee to Reelect Carl Koella Townsend, TN 37882	Primary Election	100.00
6/18	Committee to Reelect Carl Moore 108 Shady Lane Bristol, TN 37260	Primary Election	100.00
6/18	Committee to Reelect Anna O'Brien Route 15, Tansi Crossville, TN 38555	Primary Election	100.00
6/18	Committee to Reelect John Rucker 327 Minerva Drive Murfreesboro, TN 37130	Primary Election	100.00
6/18	Committee to Reelect Joe Bewley Monte Vista Greeneville, TN 37743	Primary Election	100.00
6/18	Committee to Reelect Steve Bivens 1501 20th Street, NW Cleveland, TN 37311	Primary Election	100.00
6/18	Committee to Reelect John Brass 127 Northfield Murfreesboro, TN 37130	Primary Election	100.00

14. Campaign Treasurer's Initials

CD 21

15. Candidate or Chairman's Initials

[Signature]

CAMPAIGN TREASURER'S REPORT—EXPENDITURES — Continued

Report covering the period of 4/1/84 through 6/30/84Page 4 of 9 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10 Date	11. Expenditure Information	12. Purpose of Expenditure	13 Amount
6/18	Committee to Reelect Harper Brewer 993 N. Idlewild Street Memphis, TN 38107	Primary Election	\$ 100.00
6/18	Committee to Reelect Thomas Burnett Box 609 Jamestown, TN 38556	Primary Election	100.00
6/18	Committee to Reelect Dan Byrd 4595 Oak Road Arlington, TN 38002	Primary Election	100.00
6/18	Committee to Reelect John Chiles 922 Westview Avenue Nashville, TN 37205	Primary Election	100.00
6/18	Committee to Reelect Ray Clark 224 Lake Terrace Drive Hendersonville, TN 37075	Primary Election	100.00
6/18	Committee to Reelect Steve Cobb 1929 Castleman Drive Nashville, TN 37215	Primary Election	100.00
6/18	Committee to Reelect David Copeland 8950 Fuller Road Chattanooga, TN 37421	Primary Election	100.00
6/18	Committee to Reelect Floyd Crain 146 Wakewood Ripley, TN 38063	Primary Election	100.00

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—EXPENDITURES — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 5 of 9 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
6/18	Committee to Reelect Eugene Davidson Route 2 Adams, TN 37010	Primary Election	\$ 100.00
6/18	Committee to Reelect Don E. Dills Route 2, Box 438 Dyersburg, TN 38024	Primary Election	100.00
6/18	Committee to Reelect Shirley Duer Route 9, Box 53 Crossville, TN 38555	Primary Election	100.00
6/18	Committee to Reelect Victor Ellis 635 Ermar Drive Nashville, TN 37210	Primary Election	100.00
6/18	Committee to Reelect A. Frensley Box 825, Lewisburg Pk Franklin, TN 37064	Primary Election	100.00
6/18	Committee to Reelect Rbt. Gafford 604 Oakdale Hohenwald, TN 38462	Primary Election	100.00
6/18	Committee to Reelect Elbert Gill 3093 N. Watkins Memphis, TN 38127	Primary Election	100.00
6/18	Committee to Reelect James Henry Edgewater Estates Kingston, TN 37763	Primary Election	100.00

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — EXPENDITURES — Continued
 Report covering the period of 4/1/84 through 6/30/84

Page 6 of 9 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
6/18	Committee to Reelect Larry Huskey 213 Hardin Lane Sevierville, TN 37862	Primary Election	\$ 100.00
6/18	Committee to Reelect Rabon Johnson 1226 Hillcrest Drive Manchester, TN 37255	Primary Election	100.00
6/18	Committee to Reelect Dale Kelley 416 Tara Lane Huntingdon, TN 38344	Primary Election <i>Returned</i>	100.00
6/18	Committee to Reelect Joe Kent 5111 Flamingo Memphis, TN 38117	Primary Election	100.00
6/18	Committee to Reelect Robert King 1302 Sunset Drive Johnson City, TN 37601	Primary Election	100.00
6/18	Committee to Reelect James McNally 121 Amanda Drive Oak Ridge, TN 37830	Primary Election	100.00
6/18	Committee to Reelect Ted Miller 3313 Sunset Avenue Knoxville, TN 37914	Primary Election	100.00
6/18	Committee to Reelect Ruth Montgomery 3433 Parkcliffe Drive Kingsport, TN 37664	Primary Election	100.00

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

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CAMPAIGN TREASURER'S REPORT—EXPENDITURES — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 7 of 9 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
6/18	Committee to Reelect James McKinney 1303 Gallatin Road Madison, TN 37115	Primary Election	\$ 100.00
6/18	Committee to Reelect Ed Murray 101 8th Avenue, SW Winchester, TN 37398	Primary Election	100.00
6/18	Committee to Reelect Jimmy Naifeh 620 Tipton Circle Covington, TN 38019	Primary Election	100.00
6/18	Committee to Reelect W. A. Nance 1776 Bryn Mawr Circle Germantown, TN 38138	Primary Election <i>returned</i>	100.00
6/18	Committee to Reelect Frank Percy 930 Riverview Drive Elizabethton, TN 37643	Primary Election	100.00
6/18	Committee to Reelect Shelby Rhinehart P. O. Box 128 Spencer, TN 38585	Primary Election	100.00
6/18	Committee to Reelect Charles Robinson 1317 Riverwood Drive Nashville, TN 37216	Primary Election	100.00
6/18	Committee to Reelect Ruth Robinson Route 1, Box 422 Jonesboro, TN 37659	Primary Election	100.00
14. Campaign Treasurer's Initials <i>CPB</i>		15. Candidate or Chairman's Initials <i>JS</i>	

CAMPAIGN TREASURER'S REPORT—EXPENDITURES — Continued
 Report covering the period of 4/1/84 through 6/30/84

Page 8 of 9 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10 Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
6/18	Committee to Reelect M E Stafford Route 2, Stafford Drive Lenoir City, TN 37771	Primary Election	\$ 100.00
6/18	Committee to Reelect Rbt. Stallings Hwy 64 West Boliver, TN 38088	Primary Election	100.00
6/18	Committee to Reelect Paul Starnes 4004 Patton Drive Chattanooga, TN 37412	Primary Election	100.00
6/18	Committee to Reelect John Tanner 1900 Meadowlark Union City, TN 38261	Primary Election	100.00
6/18	Committee to Reelect Clyde Webb P. O. Box 724 Athens, TN 37303	Primary Election	100.00
6/18	Committee to Reelect Mayo Wix Route 4, Box 40 Westmoreland, TN 37186	Primary Election	100.00
6/18	Committee to Reelect Herman Wolfe 811 Blount Drive Savannah, GA 31401	Primary Election	100.00
6/18	Committee to Reelect Bobby Wood 7733 Lasata Lane Harrison, TN 37341	Primary Election	100.00

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—EXPENDITURES — Continued

Report covering the period of 4/1/84 through 6/30/84

Page 9 of 9 Pages

1. Name—Candidate or Committee

~~Seaboard System Railroad Political Action Committee—State~~

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
6/18	Committee to Reelect Ralph Yelton 6328 Heatherwood Lane Kingsport, TN 37663	Primary Election	\$ 100.00
6/18	Committee to Reelect David Ussery 126 Sequoia Drive Clarksville, TN 37040	Primary Election	100.00
6/29	A. P. Woodward 2445 Community Road Jacksonville, FL 32207	Accounting Services 2nd Quarter	125.00

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Committee
(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State		2. Party N/A
3. Candidate For: (Add District, Circuit or Group) N/A		4. Street Address 500 Water Street (B-4)
5. City Jacksonville	6. County Duval	7. State Florida
		8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida _____ Duval _____ County

I, A. P. Woodward _____, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 17 pages of receipts and 0 pages of expenditures, upon each which I have written my
initials, covering the period of 7/1/84 through 7/27/84
is complete, true and correct.

A. P. Woodward
Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 30th day of July A.D., 19 84

(seal)

Judith B. Arnold
Notary Public

My commission expires November 30, 19 87

State of Florida _____ Duval _____ County

I, James C. Schultz _____, being duly sworn, depose (affirm) and say that this report
containing 17 pages of receipts and 0 pages of expenditures, upon each which I have written
my initials, covering the period of 7/1/84 through 7/27/84 is
complete, true and correct.

James C. Schultz
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 30th day of JULY A.D., 19 84

(seal)

Marlene H. Ross
Notary Public

My commission expires _____
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires Mar 19 1987
Bonded Thru Patterson Esch Agency

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statutes)

Report covering the period 7/1/84 through 7/27/84

Page 1 of 17 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name—Candidate or Committee Committee-State 2. Candidate for NA
Seaboard System Railroad Political Action/

3. Street Address 500 Water Street, B-4 4. City Jacksonville 5. State Florida 6. Zip Code 32202

SUMMARY OF CONTRIBUTIONS

	Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1982 <small>*(Political Committees Only)</small>		
7. Contributions Previously Reported Year to Date	\$6,212.92	
8. Contributions This Report—Monetary	767.04	XXXXXX
9. Contributions This Report—"In-Kind"	XXXXXX	
10. Total Contributions To Date of this Report	\$6,979.96	

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Adams, J. I. 3769 Julington Creek Road Jacksonville, FL 32223		\$ 10.00
7/23	Adamson, J. R. 7316 Poinciana Avenue Jacksonville, FL 32217		5.00
7/23	Alderson, J. T., Jr. 3007 Tiger Hole Road Jacksonville, FL 32216		4.00
7/23	Arnold, D. J. 3463 Kildare Drive Birmingham, AL 35226		5.00
7/23	Bailey, J. K. 8605 Maidstone Court Raleigh, N. C. 27612		5.00
7/23	Bates, J. H. Route 2, Box 423-B1 Powell, TN 37849		5.00
7/23	Becker, R. C. 3434 Sara Drive Jacksonville, FL 32211		5.00
7/23	Bell, C. F. 9313 Cypress Shores Lane Jacksonville, FL 32217		6.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continue

Report covering the period of 7/27/84 through 7/27/84

Page 2 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Bitter, D. H. 1822 Selva Grande Drive Atlantic Beach, FL 32233		\$ 8.50
7/23	Blaes, E. J. 1010 Talley Road Chattanooga, TN 37411		5.00
7/23	Bond, R. L. 3100 Warren Court Glen Allen, VA 23060		2.50
7/23	Bozard, J. D. 2474 Boquette Avenue Jacksonville, FL 32217		4.16
7/23	Brooks, H. L., Jr. 4159 Churchwell Road Jacksonville, FL 32210		8.50
7/23	Bullard, R. L. 4705 Wadham Lane Jacksonville, FL 32210		8.34
7/23	Burton, C. J., Jr. Station Court, Lot 62 P. O. Box 57 Brooks, KY 40109		5.00
7/23	Busby, G. W. 400 Tallapoosa Street Montgomery, AL 36104		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continuation

Report covering the period of 7/1/84 through 7/27/84

Page 3 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Casey, S. B. 8000 Baymeadows Circle, E., Apt. 1 Jacksonville, FL 32216		\$ 10.00
7/23	Cash, T. B. 7210 White Birch Drive Jacksonville, FL 32211		6.00
7/23	Charron, E. A. 13877 Pleasant Valley Drive Jacksonville, FL 32225		10.00
7/23	Chick, G. F. 4455 Confederate Point Road, 6K Jacksonville, FL 32210		5.00
7/23	Christon, C. 12318 Muscovy Drive Jacksonville, FL 32223		8.50
7/23	Cole, Emried D., Jr. 11354 Oak Landings Drive Jacksonville, FL 32225		4.16
7/23	Cole, Wandaleen P. 11354 Oak Landings Drive Jacksonville, FL 32225		4.17
7/23	Cooper, Jack M. 7987 Hunter Grove Road Jacksonville, FL 32216		5.00

15. Campaign Treasurer's Initials

QBL

16. Candidate or Chairman's Initials

[Signature]

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CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 7/1/84 through 7/27/84

Page 4 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Councill, R. J. 3126 Bridlewood Lane Jacksonville, FL 32217		\$ 2.50
7/23	Crowe, J. L. 1239 Montevideo Road Jacksonville, FL 32216		10.00
7/23	Currier, L. F. 1927 Selva Marine Drive Atlantic Beach, FL 32233		8.50
7/23	Davis, J. C. 1601 Booth Street Waycross, GA 31501		1.50
7/23	Downes, T. A., Jr. 28 Old Brick Road New City, New York 10956		2.50
7/23	Dufford, K. C. 2212 Miller Oaks Court Jacksonville, FL 32217		8.50
7/23	Dumestre, M. J. 411 Cumberland Avenue Gulf Breeze, FL 32561		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 7/1/84 through 7/27/84

Page 5 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
			\$
7/23	Edel, E. E. 8915 Rearden Road Richmond, Virginia 23229		12.50
7/23	Englert, E. R. 3256 Riverside Avenue Jacksonville, FL 32205		8.50
7/23	Frame, R. E. 2839 Wood Valley Court Jacksonville, FL 32217		5.00
7/23	Fryar, J. H., Jr. 2279 Seminole Beach Road Atlantic Beach, FL 32233		5.00
7/23	Fuson, J. F. 1204 Jamaica Court Jacksonville, FL 32216		7.50
7/23	Galbreath, L. L. 1169 Morgan Circle, E. Orange Park, FL 32073		1.00
7/23	Gremillion, R. J. 3506 Pirogue Road Jeffersontown, KY 40299		2.00

15. Campaign Treasurer's Initials

[Signature]

16. Candidate or Chairman's Initials

[Signature]

86040595176

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 7/17/84 through 7/27/84

Page 6 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Haines, W. E. 2775 Sunnybrook Road Jacksonville, FL 32216		\$ 2.50
7/23	Hamilton, R. H. 8953 Chiswick Court Jacksonville, FL 32217		8.50
7/23	Harvin, H. W. 7106 Arlet Drive Jacksonville, FL 32211		5.00
7/23	Haulter, Robert J. 2574 Oakview Drive Jacksonville, FL 32216		8.50
7/23	Hawkins, R. F. 308 Dobbin Road Webster Grove, Mo. 63119		6.00
7/23	Helms, J.D.H., Jr. 1231 Lamanto Avenue, E. Jacksonville, FL 32211		2.50
7/23	Hemphill, D. W. 4717 Avon Lane Jacksonville, FL 32210		2.50
7/23	Hensley, W. T. 8470 San Clemente Drive Jacksonville, FL 32217		2.50

15. Campaign Treasurer's Initials

[Handwritten Signature]

16. Candidate or Chairman's Initials

[Handwritten Signature]

CAMPAIGN TREASURER'S REPORT -- CONTRIBUTIONS -- Continued

Report covering the period of 7/1/84 through 7/27/84

Page 7 of 17 Pages

1. Name -- Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Herde, E. W. 3948 Hickory Grove Drive Jacksonville, FL 32211		\$ 10.00
7/23	Hesler, W. D. 5752 Wilcrest Circle, S. Jacksonville, FL 32211		8.50
7/23	Holcomb, E. E. 11308 Beacon Drive Jacksonville, FL 32225		10.00
7/23	Huband, G. E. 1252 Campbell Circle Jacksonville, FL 32207		5.00
7/23	Hyers, K. K. 5417 Cary Street Richmond, VA 23226		10.00
7/23	Ingoldsby, J. H. 4317 Sage Oak Court Jacksonville, FL 32211		6.50
7/23	Ingram, C. J. 5224 Robert Scott Drive, S. Jacksonville, FL 32207		5.50
7/23	Jameson, M. L. 6119 Sack Drive, N. Jacksonville, FL 32216		4.00
15. Campaign Treasurer's Initials <i>[Signature]</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 7/1/84 through 7/27/84

Page 8 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Janowski, M. D. 3516 Compass Rose Drive, E. Jacksonville, FL 32216		\$ 8.50
7/23	Johnson, S. R. 3931 Lochlaurel Drive Jacksonville, FL 32211		10.00
7/23	Johnson, V. R., Jr. 48 Hialeah Drive Orange Park, FL 32073		2.50
7/23	Jones, A. C., Jr. 2861 Spanish Cove Trail Jacksonville, FL 32217		12.50
7/23	Kidd, E. L. 1806 Ormond Road Jacksonville, FL 32211		5.50
7/23	Kiesler, J. L. 7843 Bellemeade Blvd., S. Jacksonville, FL 32211		8.50
7/23	Kopicki, R. J. 1023 Holly Lane Jacksonville, FL 32207		10.00
7/23	Kreitzman, D. O. 8032 Jaguar Drive Jacksonville, FL 32210		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 7/1/84 through 7/27/84

Page 9 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Kuhn, D. B. 3201 Hidden Lake Drive, E. Jacksonville, FL 32216		\$ 5.00
7/23	Lanier, H. A. 7061 Old Kings Road, S., No. 95 Jacksonville, FL 32217		3.50
7/23	Laws, E. S. 3894 University Club Boulevard Jacksonville, FL 32211		2.50
7/23	Leddon, C. D. 4323 Fern Creek Drive Jacksonville, FL 32211		12.50
7/23	Lee, H. W. 410 Booth Street Callahan, FL 32011		1.00
7/23	Liggett, R. D. 10132 Deerwood Club Drive Jacksonville, FL 32216		12.50
7/23	Lockamy, A. R. 507 Sycamore Shoals Louisville, KY 40223		8.37
7/23	Logan, G. S. 2704 W. Ivywood Road Florence, S. C. 29501		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 7/1/84 through 7/27/84

Page 10 of 17 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Lucas, A. J., Jr. 4 Ponte Vedra Circle Ponte Vedra Beach, FL 32082		\$ 2.50
7/23	Ludwig, K. J 1068 Cherry Street Jacksonville, FL 32205		5.00
7/23	McConnell, T. O. 225 11th Street Atlantic Beach, FL 32233		10.00
7/23	McCormack, W. C. 1081 Arbor Lane Jacksonville, FL 32207		6.25
7/23	McNeill, G. M. 1714 Damon Drive Florence, S.C. 29501		7.50
7/23	Meadow, C. D. 3916 Mamarneck Road Louisville. KY 40218		2.00
7/23	Mercado, B. D. 1105 Knoll Drive, West Jacksonville, FL 32205		1.50
15. Campaign Treasurer's Initials <i>[Signature]</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 7/1/84 through 7/27/84

Page 11 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Minter, A. W. 4905 Lofty Pines Circle, W Jacksonville, FL 32210		\$ 8.50
7/23	Moore, G. H., Jr. 8880 Old Kings Road, S., Apt. 92 Jacksonville, FL 32217		8.50
7/23	Mott, G. B. 848 Cedar Street Jacksonville, FL 32207		10.00
7/23	Nesmith, B. N., Jr. 2618 Kingston Drive Florence, S.C. 29501		5.00
7/23	Nicol, R. M. 3918 Tara Hall Drive Jacksonville, FL 32211		15.00
7/23	Pair, J. R. 3602 Kiki Court Louisville, KY 40219		5.00
7/23	Parker, B. L. 5366 Margaret Street Orange Park, FL 32073		1.00
7/23	Phillips, B. S. 6165 Briarforest Road, N. Jacksonville, FL 32211		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 7/1/84 through 7/27/84

Page 12 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Phillips, R. W. 6165 Briarforest Road, N. Jacksonville, FL 32211		\$ 2.50
7/23	Pierce, W. E., Jr. 8252 Haverhill Street Jacksonville, FL 32211		4.00
7/23	Poole, C. D. 1208 Catalina Road, E. Jacksonville, FL 32216		10.00
7/23	Price, W. M. 632 E. Street, S.E. Washington, D. C. 20003		15.00
7/23	Prince, B. T. 6312 Long Meadow Road Charlotte, N.C. 28210		5.00
7/23	Pursley, F. E. 2737 Christopher Creek Road, N. Jacksonville, FL 32217		8.50
7/23	Ramseur, D. H. 3940 Marianna Road Jacksonville, FL 32217		2.50
7/23	Reeves, W. M., Jr. 4357 Heaven Trees Road Jacksonville, FL 32207		5.00
15. Campaign Treasurer's Initials <i>ABL</i>		16. Candidate or Chairman's Initials <i>SL</i>	

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 7/1/84 through 7/27/84

Page 13 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Renfroe, W. W., Jr. 8605 Perry Road Louisville, KY 40222		\$ 7.50
7/23	Reynolds, J. L., Jr. 1111 Oak Vale Drive Jacksonville, FL 32217		2.50
7/23	Rice, J. T. 1471 Satsuma Road Jacksonville, FL 32223		2.50
7/23	Samuels, F. N. 202 Lanark Dell Louisville, KY 40243		.50
7/23	Smith, Gary W. 421 Kaelin Drive Louisville, KY 40207		5.00
7/23	Smith, T. L. 7945 Pine Lake Road Jacksonville, FL 32216		8.50
7/23	Spencer, P. L. 8839 Heavengate Lane Jacksonville, FL 32217		.50
15. Campaign Treasurer's Initials <i>CBT</i>		16. Candidate or Chairman's Initials <i>SK</i>	

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 7/1/84 through 7/27/84

Page 14 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Summers, J. R. 3500 University Blvd., N., Apt. 1103 Jacksonville, FL 32211		\$ 2.50
7/23	Swani, P. 9435 Lita Road Jacksonville, FL 32217		1.50
7/23	Talley, B. E. 714 Clearview Madisonville, KY 42431		5.00
7/23	Tapp, J. D., Jr. 1132 Carlotta Road, W. Jacksonville, FL 32211		5.00
7/23	Thornton, W. A. 2465 Lofberg Drive Jacksonville, FL 32216		10.00
7/23	Tichenor, R. R. 9204 Trenta Lane Fern Creek, KY 40291		5.00

15. Campaign Treasurer's Initials

ABT

16. Candidate or Chairman's Initials

J. D.

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 7/1/84 through 7/27/84

Page 15 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Tillis, E. E. 410 Tweed Avenue Seffner, FL 33584		\$ 5.00
7/23	Torbett, A. P. 926 Sandalwood Drive Richardson, Texas 75080		2.50
7/23	Vaughan, J. H. Route 1, Box 365-D Midland, N.C. 28107		5.00
7/23	Vaught, W. H. Route 4, Box 263 Floyds Knobs, IN 47119		5.00
7/23	Villademoros, S. 2535 Rogero Road Jacksonville, FL 32211		2.50
7/23	Ward, K. C. 556 Lake Road Ponte Vedra Beach, FL 32082		8.50
7/23	Watson, S. T. 831 Park Avenue Florence, S.C. 29501		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 7/1/84 through 7/27/84

Page 16 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Weas, L. J. 7921 Jamaica Road, N. Jacksonville, FL 32216		\$ 8.75
7/23	White, H. G. 3262 Fruitwood Lane Jacksonville, FL 32211		10.00
7/23	White, J. M. 4385 Phillips Place Jacksonville, FL 32207		10.00
7/23	Whitfield, W. E. 500 Water Street Jacksonville, FL 32202		5.00
7/23	Widner, Larry E. 4038 Sabel Drive Jacksonville, FL 32211		2.50
7/23	Williams, J. E. 730 Bordeaux Avenue, W. Jacksonville, FL 32211		8.50
7/23	Wodehouse, C.J.O., Jr. 4116 Ponte Vedra Blvd. Jacksonville Beach, FL 32250		8.34

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT -- CONTRIBUTIONS -- *Continued*
 Report covering the period of **7/1/84** through **7/27/84**

Page **17** of **17** Pages

1. Name -- Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/23	Youngblood, J. L. 11864 Mandarin Forest Drive Jacksonville, FL 32223		\$ 5.00
7/24	Weldon, J. W. 380 5th Street Atlantic Beach, FL 32233		50.00

15. Campaign Treasurer's Initials

JSK

16. Candidate or Chairman's Initials

JSK

86040395188

CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Committee
(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Cte.-		State 2. Party N/A
3. Candidate For: (Add District, Circuit or Group) N/A		4. Street Address 500 Water Street (B-4)
5. City Jacksonville	6. County Duval	7. State 8. Zip Code Florida 32202

Verification By Oath or Affirmation

State of Florida _____ Duval _____ County

I, A. P. Woodward _____, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 1 pages of receipts and 0 pages of expenditures, upon each which I have written my
initials, covering the period of 7/28/84 through 8/10/84
is complete, true and correct.

A. P. Woodward
Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 16th day of August A.D., 1984

(seal)

Judith B. Arnold
Notary Public

My commission expires November 30, 1987

State of Florida _____ Duval _____ County

I, James C. Schultz _____, being duly sworn, depose (affirm) and say that this report
containing 1 pages of receipts and 0 pages of expenditures, upon each which I have written
my initials, covering the period of 7/28/84 through 8/10/84 is
complete, true and correct.

James C. Schultz
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 20th day of August A.D., 1984

(seal)

Judith B. Arnold
Notary Public

My commission expires November 30 1987

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statute)

Report covering the period 7/28/84 through 8/10/84

Page 1 of 1 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 *must* be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name—Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate for N/A	
3. Street Address 500 Water Street (B-4)		4. City Jacksonville	5. State Florida
		6. Zip Code 32202	
SUMMARY OF CONTRIBUTIONS		Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1983 <small>*(Political Committees Only)</small>			
7. Contributions Previously Reported Year to Date		\$ 6,979.96	
8. Contributions This Report—Monetary		572.99	XXXXXX
9. Contributions This Report—"In-Kind"		XXXXXX	
10. Total Contributions To Date of this Report		\$ 7,552.95	
11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
7/30	July Checking Account Interest		\$ 22.99
8/2	Alexander, W. E. Jr. 6116 San Jose Boulevard, W. Jacksonville, FL 32217		200.00
8/8	Returned check because of no opposition Committee to Reelect W. A. Nance 1776 Bryn Mawr Cir., Germantown, TN 38138		100.00
8/8	Returned check because chose not to run Committee to Reelect Dale Russell Kelley 416 Tara Lane, Huntington, TN 38344		100.00
8/8	Parker, A. C., Jr. 4646 Lancelot Lane Jacksonville, FL 32210		100.00
8/10	Adams, Aden C. 7960 Hunters Grove Road Jacksonville, FL 32216		50.00
15. Campaign Treasurer's Initials <i>[Signature]</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A

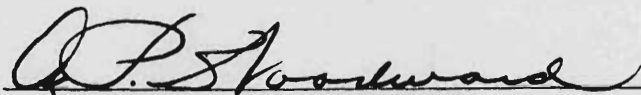
Candidate or Committee
(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State		2. Party N/A
3. Candidate For: (Add District, Circuit or Group) N/A		4. Street Address 500 Water Street (B-4)
5. City Jacksonville	6. County Duval	7. State Florida
		8. Zip Code 32202

Verification By Oath or Affirmation

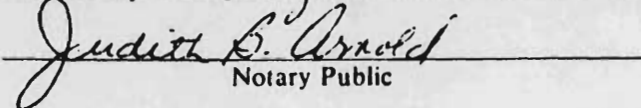
State of Florida Duval County

I, A. P. Woodward, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 17 pages of receipts and 3 pages of expenditures, upon each which I have written my
initials, covering the period of 8/11/84 through 8/24/84
is complete, true and correct.


Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 30th day of August A.D., 1984

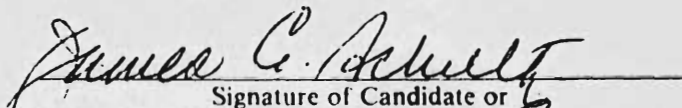
(seal)


Notary Public

My commission expires November 30, 1987

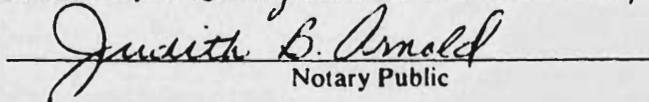
State of Florida Duval County

I, James C. Schultz, being duly sworn, depose (affirm) and say that this report
containing 17 pages of receipts and 3 pages of expenditures, upon each which I have written
my initials, covering the period of 8/11/84 through 8/24/84 is
complete, true and correct.


Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 31st day of August A.D., 1984

(seal)


Notary Public

My commission expires November 30 1987

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statutes)

Report covering the period 8/11/84 through 8/24/84

Page 1 of 17 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name—Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate for NA	
3. Street Address 500 Water Street, B-4	4. City Jacksonville	5. State Florida	6. Zip Code 32202
SUMMARY OF CONTRIBUTIONS		Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1982 <small>*(Political Committees Only)</small>			
7. Contributions Previously Reported Year to Date		\$ 7,552.95	
8. Contributions This Report—Monetary		1,077.04	XXXXXX
9. Contributions This Report—"In-Kind"		XXXXXX	
10. Total Contributions To Date of this Report		\$ 8,629.99	
11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Adams, J. I. 3769 Julington Creek Road Jacksonville, FL 32223		\$ 10.00
8/22	Adamson, J. R. 7316 Poinciana Avenue Jacksonville, FL 32217		5.00
8/22	Alderson, J. T., Jr. 3007 Tiger Hole Road Jacksonville, FL 32216		4.00
8/22	Arnold, D. J. 3463 Kildare Drive Birmingham, AL 35226		5.00
8/22	Bailey, J. K. 8605 Maidstone Court Raleigh, N. C. 27612		5.00
8/22	Bates, J. H. Route 2, Box 423-B1 Powell, TN 37849		5.00
8/22	Becker, R. C. 3434 Sara Drive Jacksonville, FL 32211		5.00
8/22	Bell, C. F. 9313 Cypress Shores Lane Jacksonville, FL 32217		6.00
15. Campaign Treasurer's Initials <i>[Signature]</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 8/1/84 through 8/24/84

Page 2 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Bitter, D. H. 1822 Selva Grande Drive Atlantic Beach, FL 32233		\$ 8.50
8/22	Blaes, E. J. 1010 Talley Road Chattanooga, TN 37411		5.00
8/22	Bond, R. L. 3100 Warren Court Glen Allen, VA 23060		2.50
8/22	Bozard, J. D. 2474 Boquette Avenue Jacksonville, FL 32217		4.16
8/22	Brooks, H. L., Jr. 4159 Churchwell Road Jacksonville, FL 32210		8.50
8/22	Bullard, R. L. 4705 Wadham Lane Jacksonville, FL 32210		8.34
8/22	Burton, C. J., Jr. Station Court, Lot 62 P. O. Box 57 Brooks, KY 40109		5.00
8/22	Busby, G. W. 400 Tallapoosa Street Montgomery, AL 36104		2.50

15. Campaign Treasurer's Initials

C. J. S.

16. Candidate or Chairman's Initials

[Signature]

CAMPAIGN TREASURER'S REPORT -- CONTRIBUTIONS -- Continued

Report covering the period of 8/1/84 through 8/24/84Page 3 of 12 Pages

1. Name -- Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Casey, S. B. 8000 Baymeadows Circle, E., Apt. 1 Jacksonville, FL 32216		\$ 10.00
8/22	Cash, T. B. 7210 White Birch Drive Jacksonville, FL 32211		6.00
8/22	Charron, E. A. 13877 Pleasant Valley Drive Jacksonville, FL 32225		10.00
8/22	Chick, G. F. 4455 Confederate Point Road, 6K Jacksonville, FL 32210		5.00
8/22	Christon, C: 12318 Muscovy Drive Jacksonville, FL 32223		8.50
8/22	Cole, Emried D., Jr. 11354 Oak Landings Drive Jacksonville, FL 32225		4.16
8/22	Cole, Wandaleen P. 11354 Oak Landings Drive Jacksonville, FL 32225		4.17
8/22	Cooper, Jack M. 7987 Hunter Grove Road Jacksonville, FL 32216		5.00

15. Campaign Treasurer's Initials

CDBL

16. Candidate or Chairman's Initials

J.S.

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 8/1/84 through 8/24/84Page 4 of 17 pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Councill, R. J. 3126 Bridlewood Lane Jacksonville, FL 32217		\$ 2.50
8/22	Crowe, J. L. 1239 Montevideo Road Jacksonville, FL 32216		10.00
8/22	Currier, L. F. 1927 Selva Marine Drive Atlantic Beach, FL 32233		8.50
8/22	Davis, J. C. 1601 Booth Street Waycross, GA 31501		1.50
8/22	Downes, T. A., Jr. 28 Old Brick Road New City, New York 10956		2.50
8/22	Dufford, K. C. 2212 Miller Oaks Court Jacksonville, FL 32217		8.50
8/22	Dumestre, M. J. 411 Cumberland Avenue Gulf Breeze, FL 32561		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 8/1/84 through 8/24/84Page 5 of 11 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Edel, E. E. 8915 Rearden Road Richmond, Virginia 23229		12.50
8/22	Englert, E. R. 3256 Riverside Avenue Jacksonville, FL 32205		8.50
8/22	Frame, R. E. 2839 Wood Valley Court Jacksonville, FL 32217		5.00
8/22	Fryar, J. H., Jr. 2279 Seminole Beach Road Atlantic Beach, FL 32233		5.00
8/22	Fuson, J. F. 1204 Jamaica Court Jacksonville, FL 32216		7.50
8/22	Galbreath, L. L. 1169 Morgan Circle, E. Orange Park, FL 32073		1.00
8/22	Gremillion, R. J. 3506 Pirogue Road Jeffersontown, KY 40299		2.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 8/1/84 through 8/24/84

Page 6 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11 Date	12 Contributor Information	13 Description of In-Kind Contributions	14 Amount
8/22	Haines, W. E. 2775 Sunnybrook Road Jacksonville, FL 32216		\$ 2.50
8/22	Hamilton, R. H. 8953 Chiswick Court Jacksonville, FL 32217		8.50
8/22	Harvin, H. W. 7106 Arlet Drive Jacksonville, FL 32211		5.00
8/22	Haulter, Robert J. 2574 Oakview Drive Jacksonville, FL 32216		8.50
8/22	Hawkins, R. F. 308 Dobbin Road Webster Grove, Mo. 63119		6.00
8/22	Helms, J.D.H., Jr. 1231 Lamanto Avenue, E. Jacksonville, FL 32211		2.50
8/22	Hemphill, D. W. 4717 Avon Lane Jacksonville, FL 32210		2.50
8/22	Hensley, W. T. 8470 San Clemente Drive Jacksonville, FL 32217		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT -- CONTRIBUTIONS -- Continued

Report covering the period of 8/11/84 through 8/24/84Page 7 of 17 Pages

1. Name -- Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Herde, E. W. 3948 Hickory Grove Drive Jacksonville, FL 32211		\$ 10.00
8/22	Hesler, W. D. 5752 Wilcrest Circle, S. Jacksonville, FL 32211		8.50
8/22	Holcomb, E. E. 11308 Beacon Drive Jacksonville, FL 32225		10.00
8/22	Huband, G. E. 1252 Campbell Circle Jacksonville, FL 32207		5.00
8/22	Hyers, K. K. 5417 Cary Street Richmond, VA 23226		10.00
8/22	Ingoldsby, J. H. 4317 Sage Oak Court Jacksonville, FL 32211		6.50
8/22	Ingram, C. J. 5224 Robert Scott Drive, S. Jacksonville, FL 32207		5.50
8/22	Jameson, M. L. 6119 Sack Drive, N. Jacksonville, FL 32216		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued
 Report covering the period of 8/11/84 through 8/24/84

Page 8 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Janowski, M. D. 3516 Compass Rose Drive, E. Jacksonville, FL 32216		\$ 8.50
8/22	Johnson, S. R. 3931 Lochlaurel Drive Jacksonville, FL 32211		10.00
8/22	Johnson, V. R., Jr. 48 Hialeah Drive Orange Park, FL 32073		2.50
8/22	Jones, A. C., Jr. 2861 Spanish Cove Trail Jacksonville, FL 32217		12.50
8/22	Kidd, E. L. 1806 Ormond Road Jacksonville, FL 32211		5.50
8/22	Kiesler, J. L. 7843 Bellemeade Blvd., S. Jacksonville, FL 32211		8.50
8/22	Kopicki, R. J. 1023 Holly Lane Jacksonville, FL 32207		10.00
8/22	Kreitzman, D. O. 8032 Jaguar Drive Jacksonville, FL 32210		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 8/11/84 through 8/24/84

Page 9 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Kuhn, D. B. 3201 Hidden Lake Drive, E. Jacksonville, FL 32216		\$ 5.00
8/22	Lanier, H. A. 7061 Old Kings Road, S., No. 95 Jacksonville, FL 32217		3.50
8/22	Laws, E. S. 3894 University Club Boulevard Jacksonville, FL 32211		2.50
8/22	Leddon, C. D. 4323 Fern Creek Drive Jacksonville, FL 32211		12.50
8/22	Lee, H. W. 410 Booth Street Callahan, FL 32011		1.00
8/22	Liggett, R. D. 10132 Deerwood Club Drive Jacksonville, FL 32216		12.50
8/22	Lockamy, A. R. 507 Sycamore Shoals Louisville, KY 40223		8.37
8/22	Logan, G. S. 2704 W. Ivywood Road Florence, S. C. 29501		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT -- CONTRIBUTIONS -- Continued

Report covering the period of 8/11/84 through 8/29/84

Page 10 of 17 Pages

1. Name--Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Lucas, A. J., Jr. 4 Ponte Vedra Circle Ponte Vedra Beach, FL 32082		\$ 2.50
8/22	Ludwig, K. J 1068 Cherry Street Jacksonville, FL 32205		5.00
8/22	McConnell, T. O. 225 11th Street Atlantic Beach, FL 32233		10.00
8/22	McCormack, W. C. 1081 Arbor Lane Jacksonville, FL 32207		6.25
8/22	McNeill, G. M. 1714 Damon Drive Florence, S.C. 29501		7.50
8/22	Meadow, C. D. 3916 Mamarneck Road Louisville. KY 40218		2.00
8/22	Mercado, B. D. 1105 Knoll Drive, West Jacksonville, FL 32205		1.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS -- Continued

Report covering the period of 8/11/84 through 8/24/84

Page 11 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Minter, A. W. 4905 Lofty Pines Circle, W Jacksonville, FL 32210		\$ 8.50
8/22	Moore, G. H., Jr. 8880 Old Kings Road, S., Apt. 92 Jacksonville, FL 32217		8.50
8/22	Mott, G. B. 848 Cedar Street Jacksonville, FL 32207		10.00
8/22	Nesmith, B. N., Jr. 2618 Kingston Drive Florence, S.C. 29501		5.00
8/22	Nicol, R. M. 3918 Tara Hall Drive Jacksonville, FL 32211		15.00
8/22	Pair, J. R. 3602 Kiki Court Louisville, KY 40219		5.00
8/22	Parker, B. L. 5366 Margaret Street Orange Park, FL 32073		1.00
8/22	Phillips, B. S. 6165 Briarforest Road, N. Jacksonville, FL 32211		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 8/11/84 through 8/24/84

Page 12 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Phillips, R. W. 6165 Briarforest Road, N. Jacksonville, FL 32211		\$ 2.50
8/22	Pierce, W. E., Jr. 8252 Haverhill Street Jacksonville, FL 32211		4.00
8/22	Poole, C. D. 1208 Catalina Road, E. Jacksonville, FL 32216		10.00
8/22	Prince, B. T. 6312 Long Meadow Road Charlotte, N.C. 28210		5.00
8/22	Pursley, F. E. 2737 Christopher Creek Road, N. Jacksonville, FL 32217		8.50
8/22	Ramseur, D. H. 3940 Marianna Road Jacksonville, FL 32217		2.50
8/22	Reeves, W. M., Jr. 4357 Heaven Trees Road Jacksonville, FL 32207		5.00
15. Campaign Treasurer's Initials <i>[Signature]</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 8/11/84 through 8/24/84

Page 13 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Renfroe, W. W., Jr. 8605 Perry Road Louisville, KY 40222		\$ 7.50
8/22	Reynolds, J. L., Jr. 1111 Oak Vale Drive Jacksonville, FL 32217		2.50
8/22	Rice, J. T. 1471 Satsuma Road Jacksonville, FL 32223		2.50
8/22	Samuels, F. N. 202 Lanark Dell Louisville, KY 40243		.50
8/22	Smith, Gary W. 421 Kaelin Drive Louisville, KY 40207		5.00
8/22	Smith, T. L. 7945 Pine Lake Road Jacksonville, FL 32216		8.50
8/22	Spencer, P. L. 8839 Heavengate Lane Jacksonville, FL 32217		.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS — Continued

Report covering the period of 8/11/84 through 8/24/84

Page 14 of 17 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Summers, J. R. 3500 University Blvd., N., Apt. 1103 Jacksonville, FL 32211		\$ 2.50
8/22	Swani, P. 9435 Lita Road Jacksonville, FL 32217		1.50
8/22	Talley, B. E. 714 Clearview Madisonville, KY 42431		5.00
8/22	Tapp, J. D., Jr. 1132 Carlotta Road, W. Jacksonville, FL 32211		5.00
8/22	Thornton, W. A. 2465 Lofberg Drive Jacksonville, FL 32216		10.00
8/22	Tichenor, R. R. 9204 Trenta Lane Fern Creek, KY 40291		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 8/11/84 through 8/24/84Page 15 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Tillis, E. E. 410 Tweed Avenue Seffner, FL 33584		\$ 5.00
8/22	Torbett, A. P. 926 Sandalwood Drive Richardson, Texas 75080		2.50
8/22	Vaughan, J. H. Route 1, Box 365-D Midland, N.C. 28107		5.00
8/22	Vaught, W. H. Route 4, Box 263 Floyds Knobs, IN 47119		5.00
8/22	Villademoros, S. 2535 Rogero Road Jacksonville, FL 32211		2.50
8/22	Ward, K. C. 556 Lake Road Ponte Vedra Beach, FL 32082		8.50
8/22	Watson, S. T. 831 Park Avenue Florence, S.C. 29501		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 8/11/84 through 8/24/84

Page 16 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Weas, L. J. 7921 Jamaica Road, N. Jacksonville, FL 32216		\$ 8.75
8/22	White, H. G. 3262 Fruitwood Lane Jacksonville, FL 32211		10.00
8/22	White, J. M. 4385 Phillips Place Jacksonville, FL 32207		10.00
8/22	Whitfield, W. E. 500 Water Street Jacksonville, FL 32202		5.00
8/22	Widner, Larry E. 4038 Sabel Drive Jacksonville, FL 32211		2.50
8/22	Williams, J. E. 730 Bordeaux Avenue, W. Jacksonville, FL 32211		8.50
8/22	Wodehouse, C.J.O., Jr. 4116 Ponte Vedra Blvd. Jacksonville Beach, FL 32250		8.34
15. Campaign Treasurer's Initials <i>ABT</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 8/11/84 through 8/24/84

Page 17 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
8/22	Youngblood, J. L. 11864 Mandarin Forest Drive Jacksonville, FL 32223		\$ 5.00
8/17	Skipper, Guy T. 212 Sweetbriar Drive Richmond, VA 23233		100.00
8/17	McLean, Leonard 1938 Landwood Street Jacksonville, FL 32211		25.00
8/17	Allen, Robert V. 11750 White Bluff Drive, S. Jacksonville, FL. 32225		100.00
8/21	Christian, R. I. 1027 Brookmont Avenue, E Jacksonville, FL 32211		50.00
8/21	Rose, R. H. 8105 Pine Lake Road Jacksonville, FL 32216		100.00

15. Campaign Treasurer's Initials

JBK

16. Candidate or Chairman's Initials

JS

CAMPAIGN TREASURER'S REPORT EXPENDITURES

(Section 106.07(4) Florida Statutes)

Report covering the period of 8/11/84 through 8/24/84 Page 1 of 3 Pages

Instructions — Complete information in Items 1 through 15. In Item 11, Expenditure Information, enter full name and address of each person to whom expenditures have been made, the amount, date and purpose of each expenditure. Items 14 and 15 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right hand corner.

1. Name — Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate For N/A	
3. Street Address 500 Water Street	4. City Jacksonville,	5. State FL	6. Zip Code 32202
7. Expenditures Previously Reported, Year to Date			\$ 12,350.00
8. Expenditures This Report			\$ 2,200.00
9. Total Expenditures To Date of This Report (line 7 and 8)			\$ 14,550.00

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
8/20	Committee to Elect Dana E. Moore 2420 Volunteer Parkway, #6 Bristol, Tennessee 37620	Primary	\$ 100.00
8/20	Committee to Elect Jimmy W. Bilbo 3614 Rolling Brook Drive Cleveland, Tennessee 37311	Primary	100.00
8/20	Committee to Elect Lawrence D. "Cotton" Robertson Rt. 1 Speedwell, Tennessee 37870	Primary	100.00
8/20	Committee to Elect Jerry A. Jared 1607 Sherwood Lane Cookeville, Tennessee 38501	Primary	100.00
8/20	Committee to Elect Mike Murphy 32 Legislative Plaza Nashville, Tennessee 37219	Primary	100.00

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — EXPENDITURES — Continued

Report covering the period of 8/11/84 through 8/24/84

Page 2 of 3 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10 Date	11. Expenditure Information	12. Purpose of Expenditure	13 Amount
8/20	Committee to Elect Billy Goodrich Route 2 Humboldt, Tennessee 38343 <i>8/21 of report</i>	Primary <i>Ch returned see 7/24</i>	\$ 100.00
8/20	Committee to Elect Leslie Winningham Carson Drive Helenwood, Tennessee 37755	Primary	100.00
8/20	Committee to Elect W. Crutchfield 503 Battery Place Chattanooga, Tennessee 37415	Primary	100.00
8/22	Louis Fortenberry Campaign Cte. P. O. Box 1164 Pascagoula, MS 39567	General	200.00
8/22	Bob Montgomery Campaign Cte. 360 North Liberty Street Canton, MS 39046	General	200.00
8/22	Tommy Brooks Campaign Committee Carthage Mississippi 39501	General	200.00
8/22	Billy Thames Campaign Committee P. O. Box 158 Mize, MS 39116	General	200.00
8/22	Ed Perry Campaign Committee P. O. Box 70 Oxford, MS 38655	General	200.00

14. Campaign Treasurer's Initials

CW/BL

15. Candidate or Chairman's Initials

[Signature]

CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Committee
(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State		2. Party N/A
3. Candidate For: (Add District, Circuit or Group) N/A		4. Street Address 500 Water Street (B-4)
5. City Jacksonville	6. County Duval	7. State Florida
		8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida _____ Duval _____ County

I, A. P. Woodward
(Please Type or Print), being duly sworn, depose (affirm) and say that this report
containing 1 pages of receipts and 0 pages of expenditures, upon each which I have written my
initials, covering the period of 8/25/84 through 9/7/84
is complete, true and correct.

A. P. Woodward
Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 11th day of September A.D., 1984

(seal)

Judith B. Arnold
Notary Public

My commission expires November 30, 1987

State of Florida _____ Duval _____ County

I, James C. Schultz, being duly sworn, depose (affirm) and say that this report
containing 1 pages of receipts and 0 pages of expenditures, upon each which I have written
my initials, covering the period of 8/25/84 through 9/7/84 is
complete, true and correct.

James C. Schultz
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 12th day of September A.D., 1984

(seal)

Marlene H. Ross
Notary Public

My commission expires NOTARY PUBLIC, STATE OF FLORIDA
My commission expires May 12, 1987
Bonded Thru Patterson-Becht Agency

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statute)

Report covering the period 8/25/84 through 9/7/84

Page 1 of 1 Pages

INSTRUCTIONS - Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name - Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate for N/A.	
3. Street Address 500 Water Street		4. City Jacksonville	5. State FL
		6. Zip Code 32202	

SUMMARY OF CONTRIBUTIONS	Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1983 <small>*(Political Committees Only)</small>		
7. Contributions Previously Reported Year to Date	\$ 8,629.99	
8. Contributions This Report - Monetary	191.61	XXXXXX
9. Contributions This Report - "In-Kind"	XXXXXX	
10. Total Contributions To Date of this Report	\$ 8,821.60	

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/7/84	Yearwood, D. M. 563 Rockingham Road Orange Park, FL 32073		\$ 75.00
9/7/84	Check #259 of 8/10/84 to Jack Goodrich returned because candidate not accepting PAC contributions.		100.00
Aug.	Checking Account Interest -		16.61
		Total	\$191.61

15. Campaign Treasurer's Initials 	16. Candidate or Chairman's Initials
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CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Committee
(Section 100.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State 2. Party N/A
3. Candidate For: (Add District, Circuit or Group) N/A 4. Street Address 500 Water Street (B-4)
5. City Jacksonville 6. County Duval 7. State Florida 8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida Duval County

I, A. P. Woodward, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 17 pages of receipts and 2 pages of expenditures, upon each which I have written my
initials, covering the period of 9/22/84 through 10/4/84
is complete, true and correct.

A. P. Woodward
Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 5TH day of OCTOBER A.D., 19 84

(seal)

Marlene H. Cross
Notary Public

My commission expires 10/1/85, 19 85
Bonded thru Florida

State of Florida Duval County

I, James C. Schultz, being duly sworn, depose (affirm) and say that this report
containing 17 pages of receipts and 2 pages of expenditures, upon each which I have written
my initials, covering the period of 9/22/84 through 10/4/84 is
complete, true and correct.

James C. Schultz
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 5TH day of OCTOBER A.D., 19 84

(seal)

Marlene H. Cross
Notary Public

My commission expires 10/1/85, 19 85
Bonded thru Florida

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statutes)

Report covering the period 9/22/84 through 10/4/84

Page 1 of 17 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name — Candidate or Committee Seaboard System Railroad Political Action/		Committee-State		2. Candidate for NA	
3. Street Address 500 Water Street, B-4		4. City Jacksonville		5. State Florida	6. Zip Code 32202
SUMMARY OF CONTRIBUTIONS				Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1982 <small>*(Political Committee Only)</small>					
7. Contributions Previously Reported Year to Date				\$8,821.60	
8. Contributions This Report — Monetary				808.71	XXXXXX
9. Contributions This Report — "In-Kind"				XXXXXX	
10. Total Contributions To Date of this Report				\$9,630.31	
11. Date	12. Contributor Information			13. Description of In-Kind Contributions	14. Amount
9/28	Adams, J. I. 3769 Julington Creek Road Jacksonville, FL 32223				\$ 10.00
9/28	Adamson, J. R. 7316 Poinciana Avenue Jacksonville, FL 32217				5.00
9/28	Alderson, J. T., Jr. 3007 Tiger Hole Road Jacksonville, FL 32216				4.00
9/28	Arnold, D. J. 3463 Kildare Drive Birmingham, AL 35226				5.00
9/28	Bailey, J. K. 8605 Maidstone Court Raleigh, N. C. 27612				5.00
9/28	Bates, J. H. Route 2, Box 423-B1 Powell, TN 37849				5.00
9/28	Becker, R. C. 3434 Sara Drive Jacksonville, FL 32211				5.00
9/28	Bell, C. F. 9313 Cypress Shores Lane Jacksonville, FL 32217				6.00
15. Campaign Treasurer's Initials <i>C. J. [Signature]</i>				16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 9/1/81 through 10/4/81

Page 2 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Bitter, D. H. 1822 Selva Grande Drive Atlantic Beach, FL 32233		\$ 8.50
9/28	Blaes, E. J. 1010 Talley Road Chattanooga, TN 37411		5.00
9/28	Bond, R. L. 3100 Warren Court Glen Allen, VA 23060		2.50
9/28	Bozard, J. D. 2474 Boquette Avenue Jacksonville, FL 32217		4.16
9/28	Brooks, H. L., Jr. 4159 Churchwell Road Jacksonville, FL 32210		8.50
9/28	Bullard, R. L. 4705 Wadham Lane Jacksonville, FL 32210		8.34
9/28	Burton, C. J., Jr. Station Court, Lot 62 P. O. Box 57 Brooks, KY 40109		5.00
9/28	Busby, G. W. 400 Tallapoosa Street Montgomery, AL 36104		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 9/1/84 through 10/4/84

Page 3 of 11 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Casey, S. B. 8000 Baymeadows Circle, E., Apt. 1 Jacksonville, FL 32216		\$ 10.00
9/28	Cash, T. B. 7210 White Birch Drive Jacksonville, FL 32211		6.00
9/28	Charron, E. A. 13877 Pleasant Valley Drive Jacksonville, FL 32225		10.00
9/28	Chick, G. F. 4455 Confederate Point Road, 6K Jacksonville, FL 32210		5.00
9/28	Christon, C. 12318 Muscovy Drive Jacksonville, FL 32223		8.50
9/28	Cole, Emried D., Jr. 11354 Oak Landings Drive Jacksonville, FL 32225		4.16
9/28	Cole, Wandaleen P. 11354 Oak Landings Drive Jacksonville, FL 32225		4.17
9/28	Cooper, Jack M. 7987 Hunter Grove Road Jacksonville, FL 32216		5.00

15. Campaign Treasurer's Initials

QBL

16. Candidate or Chairman's Initials

QJ

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continuation

Report covering the period of 9/1/84 through 10/4/84

Page 4 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Councill, R. J. 3126 Bridlewood Lane Jacksonville, FL 32217		\$ 2.50
9/28	Crowe, J. L. 1239 Montevideo Road Jacksonville, FL 32216		10.00
9/28	Currier, L. F. 1927 Selva Marine Drive Atlantic Beach, FL 32233		8.50
9/28	Davis, J. C. 1601 Booth Street Waycross, GA 31501		1.50
9/28	Downes, T. A., Jr. 28 Old Brick Road New City, New York 10956		2.50
9/28	Dufford, K. C. 2212 Miller Oaks Court Jacksonville, FL 32217		8.50
9/28	Dumestre, M. J. 411 Cumberland Avenue Gulf Breeze, FL 32561		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 9/1/81 through 10/4/81

Page 5 of 17 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
			\$
9/28	Edel, E. E. 8915 Rearden Road Richmond, Virginia 23229		12.50
9/28	Englert, E. R. 3256 Riverside Avenue Jacksonville, FL 32205		8.50
9/28	Frame, R. E. 2839 Wood Valley Court Jacksonville, FL 32217		5.00
9/28	Fryar, J. H., Jr. 2279 Seminole Beach Road Atlantic Beach, FL 32233		5.00
9/28	Fuson, J. F. 1204 Jamaica Court Jacksonville, FL 32216		7.50
9/28	Galbreath, L. L. 1169 Morgan Circle, E. Orange Park, FL 32073		1.00
9/28	Gremillion, R. J. 3506 Pirogue Road Jeffersontown, KY 40299		2.00

15. Campaign Treasurer's Initials

CLB

16. Candidate or Chairman's Initials

YH

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 9/28 through 10/4/84

Page 6 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Haines, W. E. 2775 Sunnybrook Road Jacksonville, FL 32216		\$ 2.50
9/28	Hamilton, R. H. 8953 Chiswick Court Jacksonville, FL 32217		8.50
9/28	Harvin, H. W. 7106 Arlet Drive Jacksonville, FL 32211		5.00
9/28	Haulter, Robert J. 2574 Oakview Drive Jacksonville, FL 32216		8.50
9/28	Hawkins, R. F. 308 Dobbin Road Webster Grove, Mo. 63119		6.00
9/28	Helms, J.D.H., Jr. 1231 Lamanto Avenue, E. Jacksonville, FL 32211		2.50
9/28	Hemphill, D. W. 4717 Avon Lane Jacksonville, FL 32210		2.50
9/28	Hensley, W. T. 8470 San Clemente Drive Jacksonville, FL 32217		2.50

15. Campaign Treasurer's Initials

[Signature]

16. Candidate or Chairman's Initials

[Signature]

CAMPAIGN TREASURER'S REPORT -- CONTRIBUTIONS -- Continued

Report covering the period of 9/22/84 through 10/4/84

Page 7 of 17 Pages

1. Name -- Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Herde, E. W. 3948 Hickory Grove Drive Jacksonville, FL 32211		\$ 10.00
9/28	Hesler, W. D. 5752 Wilcrest Circle, S. Jacksonville, FL 32211		8.50
9/28	Holcomb, E. E. 11308 Beacon Drive Jacksonville, FL 32225		10.00
9/28	Huband, G. E. 1252 Campbell Circle Jacksonville, FL 32207		5.00
9/28	Hyers, K. K. 5417 Cary Street Richmond, VA 23226		10.00
9/28	Ingoldsby, J. H. 4317 Sage Oak Court Jacksonville, FL 32211		6.50
9/28	Ingram, C. J. 5224 Robert Scott Drive, S. Jacksonville, FL 32207		5.50
9/28	Jameson, M. L. 6119 Sack Drive, N. Jacksonville, FL 32216		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 9/22/84 through 10/4/84Page 8 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Janowski, M. D. 3516 Compass Rose Drive, E. Jacksonville, FL 32216		\$ 8.50
9/28	Johnson, S. R. 3931 Lochlaurel Drive Jacksonville, FL 32211		10.00
9/28	Johnson, V. R., Jr. 48 Hialeah Drive Orange Park, FL 32073		2.50
9/28	Jones, A. C., Jr. 2861 Spanish Cove Trail Jacksonville, FL 32217		12.50
9/28	Kidd, E. L. 1806 Ormond Road Jacksonville, FL 32211		5.50
9/28	Kiesler, J. L. 7843 Bellemeade Blvd., S. Jacksonville, FL 32211		8.50
9/28	Kopicki, R. J. 1023 Holly Lane Jacksonville, FL 32207		10.00
9/28	Kreitzman, D. O. 8032 Jaguar Drive Jacksonville, FL 32210		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 9/22/84 through 10/4/84

Page 9 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Kuhn, D. B. 3201 Hidden Lake Drive, E. Jacksonville, FL 32216		\$ 5.00
9/28	Lanier, H. A. 7061 Old Kings Road, S., No. 95 Jacksonville, FL 32217		3.50
9/28	Laws, E. S. 3894 University Club Boulevard Jacksonville, FL 32211		2.50
9/28	Leddon, C. D. 4323 Fern Creek Drive Jacksonville, FL 32211		12.50
9/28	Lee, H. W. 410 Booth Street Callahan, FL 32011		1.00
9/28	Liggett, R. D. 10132 Deerwood Club Drive Jacksonville, FL 32216		12.50
9/28	Lockamy, A. R. 507 Sycamore Shoals Louisville, KY 40223		8.37
9/28	Logan, G. S. 2704 W. Ivywood Road Florence, S. C. 29501		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER REPORT - CONTRIBUTIONS - Continuation

Report covering the period of 9/22/84 through 10/4/84

Page 10 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Lucas, A. J., Jr. 4 Ponte Vedra Circle Ponte Vedra Beach, FL 32082		\$ 2.50
9/28	Ludwig, K. J 1068 Cherry Street Jacksonville, FL 32205		5.00
9/28	McConnell, T. O. 225 11th Street Atlantic Beach, FL 32233		10.00
9/28	McCormack, W. C. 1081 Arbor Lane Jacksonville, FL 32207		6.25
9/28	McNeill, G. M. 1714 Damon Drive Florence, S.C. 29501		10.00
9/28	Meadow, C. D. 3916 Mamarneck Road Louisville, KY 40218		2.00
9/28	Mercado, B. D. 1105 Knoll Drive, West Jacksonville, FL 32205		1.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 9/22/84 through 10/4/84

Page 11 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Minter, A. W. 4905 Lofty Pines Circle, W Jacksonville, FL 32210		\$ 8.50
9/28	Moore, G. H., Jr. 8880 Old Kings Road, S., Apt. 92 Jacksonville, FL 32217		8.50
9/28	Mott, G. B. 848 Cedar Street Jacksonville, FL 32207		10.00
9/28	Nesmith, B. N., Jr. 2618 Kingston Drive Florence, S.C. 29501		5.00
9/28	Nicol, R. M. 3918 Tara Hall Drive Jacksonville, FL 32211		15.00
9/28	Pair, J. R. 3602 Kiki Court Louisville, KY 40219		5.00
9/28	Parker, B. L. 5366 Margaret Street Orange Park, FL 32073		1.00
9/28	Phillips, B. S. 6165 Briarforest Road, N. Jacksonville, FL 32211		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 9/22/84 through 10/4/84

Page 12 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Phillips, R. W. 6165 Briarforest Road, N. Jacksonville, FL 32211		\$ 2.50
9/28	Pierce, W. E., Jr. 8252 Haverhill Street Jacksonville, FL 32211		4.00
9/28	Poole, C. D. 1208 Catalina Road, E. Jacksonville, FL 32216		10.00
9/28	Prince, B. T. 6312 Long Meadow Road Charlotte, N.C. 28210		5.00
9/28	Pursley, F. E. 2737 Christopher Creek Road, N. Jacksonville, FL 32217		8.50
9/28	Ramseur, D. H. 3940 Marianna Road Jacksonville, FL 32217		2.50
9/28	Reeves, W. M., Jr. 4357 Heaven Trees Road Jacksonville, FL 32207		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continue

Report covering the period of 9/22/84 through 10/4/84

Page 13 of 17 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Renfro, W. W., Jr. 8605 Perry Road Louisville, KY 40222		\$ 7.50
9/28	Reynolds, J. L., Jr. 1111 Oak Vale Drive Jacksonville, FL 32217		2.50
9/28	Rice, J. T. 1471 Satsuma Road Jacksonville, FL 32223		2.50
9/28	Samuels, F. N. 202 Lanark Dell Louisville, KY 40243		.50
9/28	Smith, Gary W. 421 Kaelin Drive Louisville, KY 40207		5.00
9/28	Smith, T. L. 7945 Pine Lake Road Jacksonville, FL 32216		8.50
9/28	Spencer, P. L. 8839 Heavengate Lane Jacksonville, FL 32217		.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 9/22/84 through 10/4/84

Page 14 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11 Date	12 Contributor Information	13 Description of In-Kind Contributions	14 Amount
9/28	Summers, J. R. 3500 University Blvd., N., Apt. 1103 Jacksonville, FL 32211		\$ 2.50
9/28	Swani, P. 9435 Lita Road Jacksonville, FL 32217		1.50
9/28	Talley, B. E. 714 Clearview Madisonville, KY 42431		5.00
9/28	Tapp, J. D., Jr. 1132 Carlotta Road, W. Jacksonville, FL 32211		5.00
9/28	Thornton, W. A. 2465 Lofberg Drive Jacksonville, FL 32216		10.00
9/28	Tichenor, R. R. 9204 Trenta Lane Fern Creek, KY 40291		5.00

15. Campaign Treasurer's Initials

W.B.

16. Candidate or Chairman's Initials

J.L.

CAMPAIGN TREASURER'S REPORT -- CONTRIBUTIONS -- Continued

Report covering the period of 9/22/84 through 10/4/84

Page 15 of 17 Pages

1. Name -- Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Tillis, E. E. 410 Tweed Avenue Seffner, FL 33584		\$ 5.00
9/28	Torbett, A. P. 926 Sandalwood Drive Richardson, Texas 75080		2.50
9/28	Vaughan, J. H. Route 1, Box 365-D Midland, N.C. 28107		5.00
9/28	Vaught, W. H. Route 4, Box 263 Floyds Knobs, IN 47119		5.00
9/28	Villademoros, S. 2535 Rogero Road Jacksonville, FL 32211		2.50
9/28	Ward, K. C. 556 Lake Road Ponte Vedra Beach, FL 32082		8.50
9/28	Watson, S. T. 831 Park Avenue Florence, S.C. 29501		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT -- CONTRIBUTIONS -- Continued

Report covering the period of 9/22/84 through 10/4/84Page 16 of 17 Pages

1. Name -- Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Weas, L. J. 7921 Jamaica Road, N. Jacksonville, FL 32216		\$ 8.75
9/28	White, H. G. 3262 Fruitwood Lane Jacksonville, FL 32211		10.00
9/28	White, J. M. 4385 Phillips Place Jacksonville, FL 32207		10.00
9/28	Whitfield, W. E. 500 Water Street Jacksonville, FL 32202		5.00
9/28	Widner, Larry E. 4038 Sabel Drive Jacksonville, FL 32211		2.50
9/28	Williams, J. E. 730 Bordeaux Avenue, W. Jacksonville, FL 32211		8.50
9/28	Wodehouse, C.J.O., Jr. 4116 Ponte Vedra Blvd. Jacksonville Beach, FL 32250		8.34

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS -- Continued

Report covering the period of 9/22/84 through 10/4/84

Page 17 of 17 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
9/28	Youngblood, J. L. 11864 Mandarin Forest Drive Jacksonville, FL 32223		\$ 5.00
9/28	Key, R. L., Jr. 3380 Knight Street Jacksonville, FL 32205		4.17
9/28	Sanborn, Richard D. 4463 Worth Drive, E Jacksonville, FL 32207		100.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT EXPENDITURES

(Section 106.07(4) Florida Statutes)

Report covering the period of 9/22/84 through 10/4/84 Page 1 of 2 Pages

Instructions — Complete information in Items 1 through 13. In Item 11, Expenditure Information, enter full name and address of each person to whom expenditures have been made, the amount, date and purpose of each expenditure. Items 14 and 15 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right hand corner.

1. Name—Candidate or Committee Committee-State Seaboard System Railroad Political Action		2. Candidate For N/A	
3. Street Address 500 Water Street		4. City Jacksonville	5. State FL
		6. Zip Code 32202	
7. Expenditures Previously Reported, Year to Date			\$ 14,550.00
8. Expenditures This Report			\$ 1,875.00
9. Total Expenditures To Date of This Report (line 7 and 8)			\$ 16,425.00

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
9/22	Campaign Fund for Hoover Dawahare Box 540 Whiteburg, Kentucky 41858	General	\$ 200.00
9/22	Campaign Fund for Sam B. Thomas RR #4 Lebanon, Kentucky 40033	General	250.00
10/2	Campaign Fund for Herman Ratliff 2156 North Highway 68 Cambellsville, KY 42718	General	300.00
10/2	Campaign Fund for Terry Mann 19 Douglas Drive Newport, Kentucky 41071	General	250.00
10/2	Campaign Fund for Jim Lemaster 218 Main Street Paris, Kentucky 40361	General	300.00
10/2	Campaign Fund for Charles Siler P. O. Box 417 Frankfort, Kentucky 40602	General	200.00

14. Campaign Treasurer's Initials <i>AB</i>	15. Candidate or Chairman's Initials <i>[Signature]</i>
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CAMPAIGN TREASURER'S REPORT—EXPENDITURES — Continued

Report covering the period of 9/22/84 through 10/4/84

Page 2 of 2 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
10/2	Campaign Fund for Bruce Blythe 516 Alagate Road Louisville, KY 40206	General	\$ 250.00
10/1	A. P. Woodward 2445 Community Road Jacksonville, FL 32207	Accounting Servs. 3rd Quarter	125.00

14. Campaign Treasurer's Initials

ASL

15. Candidate or Chairman's Initials

YH

CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A

Candidate or Committee
(Section 100.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State		2. Party N/A
3. Candidate For: (Add District, Circuit or Group) N/A		4. Street Address 500 Water Street (B-4)
5. City Jacksonville	6. County Duval	7. State Florida
		8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida _____ Duval _____ County

I, A. P. Woodward _____, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 0 pages of receipts and 0 pages of expenditures, upon each which I have written my
initials, covering the period of 9/8/84 through 9/21/84
is complete, true and correct.

A. P. Woodward
Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 27th day of SEPTEMBER A.D., 1984

(seal)

Mildred H. Rose
Notary Public

My commission expires _____
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires 12/31/1987
Bonded Thru Patterson-Beech Agency

State of Florida _____ Duval _____ County

I, James C. Schultz _____, being duly sworn, depose (affirm) and say that this report
containing 0 pages of receipts and 0 pages of expenditures, upon each which I have written
my initials, covering the period of 9/8/84 through 9/21/84 is
complete, true and correct.

James C. Schultz
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 27th day of SEPTEMBER A.D., 1984

(seal)

Mildred H. Rose
Notary Public

My commission expires _____
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires 12/31/1987
Bonded Thru Patterson-Beech Agency

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

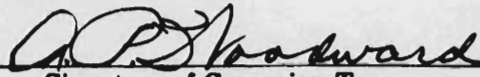
CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Political Committee
(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State		2. Party N/A	
3. Candidate For: (add District, Circuit or Group) N/A		4. Address 500 Water Street (B-4)	
5. City Jacksonville	6. County Florida	7. State Florida	8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida _____ Duval _____ County

I, A. P. Woodward _____, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 2 pages of receipts and 0 pages of expenditures, upon each which I have written
my initials, covering the period of 10/5/84 through 10/12/84 is
complete, true and correct.




Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 18 TH day of OCTOBER A.D., 19 84

(seal)

My commission expires


NOTARY PUBLIC, STATE OF FLORIDA
My commission expires 12-19-87
Bonded Thru Patterson-Becht Agency



Notary Public

State of Florida _____ Duval _____ County

I, James C. Schultz _____, being duly sworn, depose (affirm) and say that this report
containing 2 pages of receipts and 0 pages of expenditures, upon each which I have written
my initials, covering the period of 10/5/84 through 10/12/84 is
complete, true and correct.



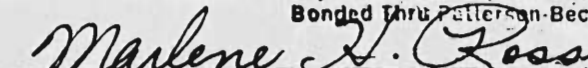
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 18 TH day of OCTOBER A.D., 19 84

(seal)

My commission expires

NOTARY PUBLIC, STATE OF FLORIDA
My commission expires 12-22-1987
Bonded Thru Patterson-Becht Agency



Notary Public

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 109.07(1) Florida Statutes)

Report covering the period 10/5/84 through 10/12/84

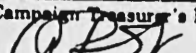
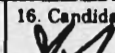
Page 1 of 2 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 *must* be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name—Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate for N/A	
3. Street Address 500 Water Street (B-4)		4. City Jacksonville	5. State Florida
		6. Zip Code 32202	

SUMMARY OF CONTRIBUTIONS	Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1983 <small>*(Political Committees Only)</small>		
7. Contributions Previously Reported Year to Date	\$ 9,630.31	
8. Contributions This Report—Monetary	825.00	XXXXXX
9. Contributions This Report—"In-Kind"	XXXXXX	
10. Total Contributions To Date of this Report	\$10,455.31	

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/12	Pigge, H. J. 6 Sandown Road Savannah, GA 31419		\$ 100.00
10/12	Christian, R. I. 1027 Brookmont Avenue, E. Jacksonville, FL 32211		50.00
10/12	Gilstrap, W. E. 3727 Cathedral Cove Road Jacksonville, FL 32217		100.00
10/12	Tutko, Donald M. 2829 Scott Mill Estates Drive Jacksonville, FL 32217		100.00
10/12	Fitzpatrick, E. V. 4156 Leeward Point Jacksonville, FL 32211		100.00
10/12	Birkholz, F.R. 4201 Sidewinder Trail Middleburg, FL 32068		100.00
10/12	Futch, J. W., Jr. 4497 Clear Creek Court Concord, California 94520		25.00
10/12	McGuigan, J. M. 4418 Charter Point Blvd. Jacksonville, FL 32211		25.00

15. Campaign Treasurer's Initials 	16. Candidate or Chairman's Initials 
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CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS

Report covering the period of 10/5/84 through 10/12/84

- Continued

Page 2 of 2 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/12	Merritt, A. B., Jr. 4081 Sabel Drive Jacksonville, FL 32211		\$ 100.00
10/12	Wilkes, E. S. 6718 Valley Lake Drive Raleigh, N.C. 27612		100.00
10/12	Johnson, W. W., Jr. 943 Romany Road Charlotte, N.C. 28203		25.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

8604059037

CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Committee
(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State		2. Party N/A	
3. Candidate For: (Add District, Circuit or Group) N/A		4. Street Address 500 Water Street	
5. City Jacksonville	6. County Duval	7. State Florida	8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida _____ Duval _____ County

I, A. P. Woodward _____, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 18 pages of receipts and 1 pages of expenditures, upon each which I have written my
initials, covering the period of 10/13/84 through 11/1/84
is complete, true and correct.

A. P. Woodward
Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 2nd day of November A.D., 19 84

(seal)

Brenda S. Kelly
Notary Public

My commission expires October 5, 1985
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires 10/5/85
Bonded by American Life & Security Company

State of Florida _____ Duval _____ County

I, James C. Schultz _____, being duly sworn, depose (affirm) and say that this report
containing 18 pages of receipts and 1 pages of expenditures, upon each which I have written
my initials, covering the period of 10/13/84 through 11/1/84 is
complete, true and correct.

James C. Schultz
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 2nd day of November A.D., 19 84

(seal)

Brenda S. Kelly
Notary Public

My commission expires October 5, 1985
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires 10/5/85
Bonded by American Life & Security Company

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.



CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statutes)

Report covering the period 10/13/84 through 11/1/84

Page 1 of 18 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name—Candidate or Committee Seaboard System Railroad Political Action/		Committee—State NA		2. Candidate for	
3. Street Address 500 Water Street, B-4		4. City Jacksonville		5. State Florida	
				6. Zip Code 32202	
SUMMARY OF CONTRIBUTIONS				Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1982 <small>*(Political Committees Only)</small>					
7. Contributions Previously Reported Year to Date				\$10,455.31	
8. Contributions This Report—Monetary				1,263.06	XXXXXX
9. Contributions This Report—"In-Kind"				XXXXXX	
10. Total Contributions To Date of this Report				\$11,718.37	
11. Date	12. Contributor Information			13. Description of In-Kind Contributions	14. Amount
10/19	Adams, J. I. 3769 Julington Creek Road Jacksonville, FL 32223				\$ 10.00
10/19	Adamson, J. R. 7316 Poinciana Avenue Jacksonville, FL 32217				5.00
10/19	Alderson, J. T., Jr. 3007 Tiger Hole Road Jacksonville, FL 32216				4.00
10/19	Arnold, D. J. 3463 Kildare Drive Birmingham, AL 35226				5.00
10/19	Bailey, J. K. 8605 Maidstone Court Raleigh, N. C. 27612				5.00
10/19	Bates, J. H. Route 2, Box 423-B1 Powell, TN 37849				5.00
10/19	Becker, R. C. 3434 Sara Drive Jacksonville, FL 32211				5.00
10/19	Bell, C. F. 9313 Cypress Shores Lane Jacksonville, FL 32217				6.00
15. Campaign Treasurer's Initials 			16. Candidate or Chairman's Initials 		

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 10/13/84 through 11/1/84

Page 2 of 18 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Bitter, D. H. 1822 Selva Grande Drive Atlantic Beach, FL 32233		\$ 8.50
10/19	Blaes, E. J. 1010 Talley Road Chattanooga, TN 37411		5.00
10/19	Bond, R. L. 3100 Warren Court Glen Allen, VA 23060		2.50
10/19	Bozard, J. D. 2474 Boquette Avenue Jacksonville, FL 32217		4.16
10/19	Brooks, H. L., Jr. 4159 Churchwell Road Jacksonville, FL 32210		8.50
10/19	Bullard, R. L. 4705 Wadham Lane Jacksonville, FL 32210		8.34
10/19	Burton, C. J., Jr. Station Court, Lot 62 P. O. Box 57 Brooks, KY 40109		5.00
10/19	Busby, G. W. 400 Tallapoosa Street Montgomery, AL 36104		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER REPORT - CONTRIBUTIONS - Contin

Report covering the period of 10/13/84 through 11/1/84

Page 3 of 18 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Casey, S. B. 8000 Baymeadows Circle, E., Apt. 1 Jacksonville, FL 32216		\$ 10.00
10/19	Cash, T. B. 7210 White Birch Drive Jacksonville, FL 32211		6.00
10/19	Charron, E. A. 13877 Pleasant Valley Drive Jacksonville, FL 32225		10.00
10/19	Chick, G. F. 4455 Confederate Point Road, 6K Jacksonville, FL 32210		5.00
10/19	Christon, C. 12318 Muscovy Drive Jacksonville, FL 32223		8.50
10/19	Cole, Emried D., Jr. 11354 Oak Landings Drive Jacksonville, FL 32225		4.16
10/19	Cole, Wandaleen P. 11354 Oak Landings Drive Jacksonville, FL 32225		4.17
10/19	Cooper, Jack M. 7987 Hunter Grove Road Jacksonville, FL 32216		5.00

15. Campaign Treasurer's Initials

ABL

16. Candidate or Chairman's Initials

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CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 10/13/84 through 11/1/84

Page 4 of 18 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Councill, R. J. 3126 Bridlewood Lane Jacksonville, FL 32217		\$ 2.50
10/19	Crowe, J. L. 1239 Montevideo Road Jacksonville, FL 32216		10.00
10/19	Currier, L. F. 1927 Selva Marine Drive Atlantic Beach, FL 32233		8.50
10/19	Davis, J. C. 1601 Booth Street Waycross, GA 31501		1.50
10/19	Downes, T. A., Jr. 28 Old Brick Road New City, New York 10956		2.50
10/19	Dufford, K. C. 2212 Miller Oaks Court Jacksonville, FL 32217		8.50
10/19	Dumestre, M. J. 411 Cumberland Avenue Gulf Breeze, FL 32561		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 5 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
			\$
10/19	Edel, E. E. 8915 Rearden Road Richmond, Virginia 23229		12.50
10/19	Frame, R. E. 2839 Wood Valley Court Jacksonville, FL 32217		5.00
10/19	Fryar, J. H., Jr. 2279 Seminole Beach Road Atlantic Beach, FL 32233		5.00
10/19	Fuson, J. F. 1204 Jamaica Court Jacksonville, FL 32216		7.50
10/19	Galbreath, L. L. 1169 Morgan Circle, E. Orange Park, FL 32073		1.00
10/19	Gremillion, R. J. 3506 Pirogue Road Jeffersontown, KY 40299		2.00

15. Campaign Treasurer's Initials

[Handwritten Signature]

16. Candidate or Chairman's Initials

[Handwritten Signature]

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 10/13/84 through 11/1/84

Page 6 of 18 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Haines, W. E. 2775 Sunnybrook Road Jacksonville, FL 32216		\$ 2.50
10/19	Hamilton, R. H. 8953 Chiswick Court Jacksonville, FL 32217		8.50
10/19	Harvin, H. W. 7106 Arlet Drive Jacksonville, FL 32211		5.00
10/19	Haulter, Robert J. 2574 Oakview Drive Jacksonville, FL 32216		8.50
10/19	Hawkins, R. F. 308 Dobbin Road Webster Grove, Mo. 63119		6.00
10/19	Helms, J.D.H., Jr. 1231 Lamanto Avenue, E. Jacksonville, FL 32211		2.50
10/19	Hemphill, D. W. 4717 Avon Lane Jacksonville, FL 32210		2.50
10/19	Hensley, W. T. 8470 San Clemente Drive Jacksonville, FL 32217		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued
 Report covering the period of 10/13/84 through 11/1/84

Page 7 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Herde, E. W. 3948 Hickory Grove Drive Jacksonville, FL 32211		\$ 10.00
10/19	Hesler, W. D. 5752 Wilcrest Circle, S. Jacksonville, FL 32211		8.50
10/19	Holcomb, E. E. 11308 Beacon Drive Jacksonville, FL 32225		10.00
10/19	Huband, G. E. 1252 Campbell Circle Jacksonville, FL 32207		5.00
10/19	Hyers, K. K. 5417 Cary Street Richmond, VA 23226		10.00
10/19	Ingoldsby, J. H. 4317 Sage Oak Court Jacksonville, FL 32211		6.50
10/19	Ingram, C. J. 5224 Robert Scott Drive, S. Jacksonville, FL 32207		5.50
10/19	Jameson, M. L. 6119 Sack Drive, N. Jacksonville, FL 32216		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 8 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Janowski, M. D. 3516 Compass Rose Drive, E. Jacksonville, FL 32216		\$ 8.50
10/19	Johnson, S. R. 3931 Lochlaurel Drive Jacksonville, FL 32211		10.00
10/19	Johnson, V. R., Jr. 48 Hialeah Drive Orange Park, FL 32073		2.50
10/19	Jones, A. C., Jr. 2861 Spanish Cove Trail Jacksonville, FL 32217		12.50
10/19	Kidd, E. L. 1806 Ormond Road Jacksonville, FL 32211		5.50
10/19	Kiesler, J. L. 7843 Bellemeade Blvd., S. Jacksonville, FL 32211		8.50
10/19	Kopicki, R. J. 1023 Holly Lane Jacksonville, FL 32207		10.00
10/19	Kreitzman, D. O. 8032 Jaguar Drive Jacksonville, FL 32210		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 9 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Kuhn, D. B. 3201 Hidden Lake Drive, E. Jacksonville, FL 32216		\$ 5.00
10/19	Lanier, H. A. 7061 Old Kings Road, S., No. 95 Jacksonville, FL 32217		3.50
10/19	Laws, E. S. 3894 University Club Boulevard Jacksonville, FL 32211		2.50
10/19	Leddon, C. D. 4323 Fern Creek Drive Jacksonville, FL 32211		12.50
10/19	Lee, H. W. 410 Booth Street Callahan, FL 32011		1.00
10/19	Liggett, R. D. 10132 Deerwood Club Drive Jacksonville, FL 32216		12.50
10/19	Lockamy, A. R. 507 Sycamore Shoals Louisville, KY 40223		8.37
10/19	Logan, G. S. 2704 W. Ivywood Road Florence, S. C. 29501		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 10 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Lucas, A. J., Jr. 4 Ponte Vedra Circle Ponte Vedra Beach, FL 32082		\$ 2.50
10/19	Ludwig, K. J 1068 Cherry Street Jacksonville, FL 32205		5.00
10/19	McConnell, T. O. 225 11th Street Atlantic Beach, FL 32233		10.00
10/19	McCormack, W. C. 1081 Arbor Lane Jacksonville, FL 32207		6.25
10/19	McNeill, G. M. 1714 Damon Drive Florence, S.C. 29501		10.00
10/19	Meadow, C. D. 3916 Mamarneck Road Louisville. KY 40218		2.00
10/19	Mercado, B. D. 1105 Knoll Drive, West Jacksonville, FL 32205		1.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 11 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Minter, A. W. 4905 Lofty Pines Circle, W Jacksonville, FL 32210		\$ 8.50
10/19	Moore, G. H., Jr. 8880 Old Kings Road, S., Apt. 92 Jacksonville, FL 32217		8.50
10/19	Mott, G. B. 848 Cedar Street Jacksonville, FL 32207		10.00
10/19	Nesmith, B. N., Jr. 2618 Kingston Drive Florence, S.C. 29501		5.00
10/19	Nicol, R. M. 3918 Tara Hall Drive Jacksonville, FL 32211		15.00
10/19	Pair, J. R. 3602 Kiki Court Louisville, KY 40219		5.00
10/19	Parker, B. L. 5366 Margaret Street Orange Park, FL 32073		1.00
10/19	Phillips, B. S. 6165 Briarforest Road, N. Jacksonville, FL 32211		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 12 of 18 Pages.

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Phillips, R. W. 6165 Briarforest Road, N. Jacksonville, FL 32211		\$ 2.50
10/19	Pierce, W. E., Jr. 8252 Haverhill Street Jacksonville, FL 32211		4.00
10/19	Poole, C. D. 1208 Catalina Road, E. Jacksonville, FL 32216		10.00
10/19	Prince, B. T. 6312 Long Meadow Road Charlotte, N.C. 28210		5.00
10/19	Pursley, F. E. 2737 Christopher Creek Road, N. Jacksonville, FL 32217		8.50
10/19	Ramseur, D. H. 3940 Marianna Road Jacksonville, FL 32217		2.50
10/19	Reeves, W. M., Jr. 4357 Heaven Trees Road Jacksonville, FL 32207		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 13 of 18 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Renfroe, W. W., Jr. 8605 Perry Road Louisville, KY 40222		\$ 7.50
10/19	Reynolds, J. L., Jr. 1111 Oak Vale Drive Jacksonville, FL 32217		2.50
10/19	Rice, J. T. 1471 Satsuma Road Jacksonville, FL 32223		2.50
10/19	Samuels, F. N. 202 Lanark Dell Louisville, KY 40243		.50
10/19	Smith, Gary W. 421 Kaelin Drive Louisville, KY 40207		5.00
10/19	Smith, T. L. 7945 Pine Lake Road Jacksonville, FL 32216		8.50
10/19	Spencer, P. L. 8839 Heavengate Lane Jacksonville, FL 32217		.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 14 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Summers, J. R. 3500 University Blvd., N., Apt. 1103 Jacksonville, FL 32211		\$ 2.50
10/19	Swani, P. 9435 Lita Road Jacksonville, FL 32217		1.50
10/19	Talley, B. E. 714 Clearview Madisonville, KY 42431		5.00
10/19	Tapp, J. D., Jr. 1132 Carlotta Road, W. Jacksonville, FL 32211		5.00
10/19	Thornton, W. A. 2465 Lofberg Drive Jacksonville, FL 32216		10.00
10/19	Tichenor, R. R. 9204 Trenta Lane Fern Creek, KY 40291		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 15 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Tillis, E. E. 410 Tweed Avenue Seffner, FL 33584		\$ 5.00
10/19	Torbett, A. P. 926 Sandalwood Drive Richardson, Texas 75080		2.50
10/19	Vaughan, J. H. Route 1, Box 365-D Midland, N.C. 28107		5.00
10/19	Vaught, W. H. Route 4, Box 263 Floyds Knobs, IN 47119		5.00
10/19	Villademoros, S. 2535 Rogero Road Jacksonville, FL 32211		2.50
10/19	Ward, K. C. 556 Lake Road Ponte Vedra Beach, FL 32082		8.50
10/19	Watson, S. T. 831 Park Avenue Florence, S.C. 29501		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 10/13/84 through 11/1/84

Page 16 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Weas, L. J. 7921 Jamaica Road, N. Jacksonville, FL 32216		\$ 8.75
10/19	White, H. G. 3262 Fruitwood Lane Jacksonville, FL 32211		10.00
10/19	White, J. M. 4385 Phillips Place Jacksonville, FL 32207		10.00
10/19	Whitfield, W. E. 500 Water Street Jacksonville, FL 32202		5.00
10/19	Widner, Larry E. 4038 Sabel Drive Jacksonville, FL 32211		2.50
10/19	Williams, J. E. 730 Bordeaux Avenue, W. Jacksonville, FL 32211		8.50
10/19	Wodehouse, C.J.O., Jr. 4116 Ponte Vedra Blvd. Jacksonville Beach, FL 32250		8.34

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS

- Continued

Report covering the period of 10/13/84 through 11/1/84

Page 17 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/19	Youngblood, J. L. 11864 Mandarin Forest Drive Jacksonville, FL 32223		\$ 5.00
10/19	Key, R. L., Jr. 3380 Knight Street		4.17
10/19	Wells, Timothy 8090 Atlantic Blvd., Apt. D68 Jacksonville, FL 32211		50.00
10/19	Hooper, P. L. 200 E. Park Circle Dickson, TN 37055		100.00
10/26	Holt, E. H. 3163 Woodfern Drive Montgomery, AL		100.00
10/26	Turner, W. J. 3610 Bush Street Raleigh, N.C. 27609		100.00
10/26	Murray, R. W. 8442 Sanlando Avenue Jacksonville, FL 32211		50.00
10/26	Dust, M. E. 3263 Cormorant Drive Jacksonville, FL 32223		50.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS

- Continued

Report covering the period of 10/13/84 through 11/1/84

Page 18 of 18 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
10/26	Wix, F. R. 3315 Sara Drive Jacksonville, FL 32211		\$ 50.00
10/19	Adams, A. C. 7960 Hunters Grove Road Jacksonville, FL 32216		50.00
10/30	September checking account interest		12.85

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

(Section 106.07(4) Florida Statutes)

Instructions — Complete information in Items 1 through 15. In Item 11, Expenditure Information, enter full name and address of each person to whom expenditures have been made, the amount, date and purpose of each expenditure. Items 14 and 15 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right hand corner.

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Committee
(Section 100.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Cte. - State		2. Party N/A	
3. Candidate For: (Add District, Circuit or Group) N/A		4. Street Address 500 Water Street	
5. City Jacksonville	6. County Duval	7. State Florida	8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida Duval County

I, A. P. Woodward, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 19 pages of receipts and 1 pages of expenditures, upon each which I have written my
initials, covering the period of 11/2/84 through 12/14/84
is complete, true and correct.

A. P. Woodward
Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 7th day of January A.D., 1985

(seal)

Judith B. Arnold
Notary Public

My commission expires November 30, 1987

State of Florida Duval County

I, James C. Schultz, being duly sworn, depose (affirm) and say that this report
containing 19 pages of receipts and 1 pages of expenditures, upon each which I have written
my initials, covering the period of 11/2/84 through 12/14/84 is
complete, true and correct.

James C. Schultz
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 7th day of JANUARY A.D., 1985

(seal)

Marlene H. Ross
Notary Public

My commission expires NOTARY PUBLIC, STATE OF FLORIDA
22, 1987
Bonded Thru Patterson-Becht Agency

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statutes)

Report covering the period 11/2/84 through 12/14/84

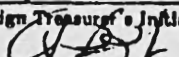
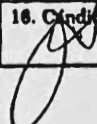
Page 1 of 19 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name—Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate for NA	
3. Street Address 500 Water Street, B-4		4. City Jacksonville	5. State Florida
		6. Zip Code 32202	

SUMMARY OF CONTRIBUTIONS	Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1983 <small>*(Political Committees Only)</small>		
7. Contributions Previously Reported Year to Date	\$11,718.37	
8. Contributions This Report—Monetary	1,052.89	XXXXXX
9. Contributions This Report—"In-Kind"	XXXXXX	
10. Total Contributions To Date of this Report	\$12,771.26	

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Adams, J. I. 3769 Julington Creek Road Jacksonville, FL 32223		\$ 10.00
11/19	Adamson, J. R. 7316 Poinciana Avenue Jacksonville, FL 32217		5.00
11/19	Alderson, J. T., Jr. 3007 Tiger Hole Road Jacksonville, FL 32216		4.00
11/19	Arnold, D. J. 3463 Kildare Drive Birmingham, AL 35226		5.00
11/19	Bailey, J. K. 8605 Maidstone Court Raleigh, N. C. 27612		5.00
11/19	Bates, J. H. Route 2, Box 423-B1 Powell, TN 37849		5.00
11/19	Becker, R. C. 3434 Sara Drive Jacksonville, FL 32211		5.00
11/19	Bell, C. F. 9313 Cypress Shores Lane Jacksonville, FL 32217		6.00

15. Campaign Treasurer's Initials 	16. Candidate or Chairman's Initials 
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CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 11/2/84 through 12/14/84Page 2 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Bitter, D. H. 1822 Selva Grande Drive Atlantic Beach, FL 32233		\$ 8.50
11/19	Blaes, E. J. 1010 Talley Road Chattanooga, TN 37411		5.00
11/19	Bond, R. L. 3100 Warren Court Glen Allen, VA 23060		2.50
11/19	Bozard, J. D. 2474 Boquette Avenue Jacksonville, FL 32217		4.16
11/19	Brooks, H. L., Jr. 4159 Churchwell Road Jacksonville, FL 32210		8.50
11/19	Bullard, R. L. 4705 Wadham Lane Jacksonville, FL 32210		8.34
11/19	Burton, C. J., Jr. Station Court, Lot 62 P. O. Box 57 Brooks, KY 40109		5.00
11/19	Busby, G. W. 400 Tallapoosa Street Montgomery, AL 36104		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 11/2/84 through 12/14/84Page 3 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Casey, S. B. 8000 Baymeadows Circle, E., Apt. 1 Jacksonville, FL 32216		\$ 10.00
11/19	Cash, T. B. 7210 White Birch Drive Jacksonville, FL 32211		6.00
11/19	Charron, E. A. 13877 Pleasant Valley Drive Jacksonville, FL 32225		10.00
11/19	Chick, G. F. 4455 Confederate Point Road, 6K Jacksonville, FL 32210		5.00
11/19	Christon, C. 12318 Muscovy Drive Jacksonville, FL 32223		8.50
11/19	Cole, Emried D., Jr. 11354 Oak Landings Drive Jacksonville, FL 32225		4.16
11/19	Cole, Wandaleen P. 11354 Oak Landings Drive Jacksonville, FL 32225		4.17
11/19	Cooper, Jack M. 7987 Hunter Grove Road Jacksonville, FL 32216		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

I. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Council, R. J. 3126 Bridlewood Lane Jacksonville, FL 32217		\$ 2.50
11/19	Crowe, J. L. 1239 Montevideo Road Jacksonville, FL 32216		10.00
11/19	Currier, L. F. 1927 Selva Marine Drive Atlantic Beach, FL 32233		8.50
11/19	Davis, J. C. 1601 Booth Street Waycross, GA 31501		1.50
11/19	Downes, T. A., Jr. 28 Old Brick Road New City, New York 10956		2.50
11/19	Dufford, K. C. 2212 Miller Oaks Court Jacksonville, FL 32217		8.50
11/19	Dumestre, M. J. 411 Cumberland Avenue Gulf Breeze, FL 32561		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 11/2/84 through 12/14/84

Page 5 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
			\$
11/19	Edel, E. E. 8915 Rearden Road Richmond, Virginia 23229		12.50
11/19	Frame, R. E. 2839 Wood Valley Court Jacksonville, FL 32217		5.00
11/19	Fryar, J. H., Jr. 2279 Seminole Beach Road Atlantic Beach, FL 32233		5.00
11/19	Fuson, J. F. 1204 Jamaica Court Jacksonville, FL 32216		7.50
11/19	Galbreath, L. L. 1169 Morgan Circle, E. Orange Park, FL 32073		1.00
11/19	Gremillion, R. J. 3506 Pirogue Road Jeffersontown, KY 40299		2.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 11/2/84 through 12/14/84Page 6 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Haines, W. E. 2775 Sunnybrook Road Jacksonville, FL 32216		\$ 2.50
11/19	Hamilton, R. H. 8953 Chiswick Court Jacksonville, FL 32217		8.50
11/19	Harvin, H. W. 7106 Arlet Drive Jacksonville, FL 32211		5.00
11/19	Haulter, Robert J. 2574 Oakview Drive Jacksonville, FL 32216		8.50
11/19	Hawkins, R. F. 308 Dobbin Road Webster Grove, Mo. 63119		6.00
11/19	Helms, J.D.H., Jr. 1231 Lamanto Avenue, E. Jacksonville, FL 32211		2.50
11/19	Hemphill, D. W. 4717 Avon Lane Jacksonville, FL 32210		2.50
11/19	Hensley, W. T. 8470 San Clemente Drive Jacksonville, FL 32217		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS -- Continued

Report covering the period of 11/2 through 12/14/84

Page 7 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Herde, E. W. 3948 Hickory Grove Drive Jacksonville, FL 32211		\$ 11.00
11/19	Hesler, W. D. 5752 Wilcrest Circle, S. Jacksonville, FL 32211		8.50
11/19	Holcomb, E. E. 11308 Beacon Drive Jacksonville, FL 32225		10.00
11/19	Huband, G. E. 1252 Campbell Circle Jacksonville, FL 32207		5.00
11/19	Hyers, K. K. 5417 Cary Street Richmond, VA 23226		10.00
11/19	Ingoldsby, J. H. 4317 Sage Oak Court Jacksonville, FL 32211		6.50
11/19	Ingram, C. J. 5224 Robert Scott Drive, S. Jacksonville, FL 32207		5.50
11/19	Jameson, M. L. 6119 Sack Drive, N. Jacksonville, FL 32216		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 11/2 through 12/14/84Page 8 of 19 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Janowski, M. D. 3516 Compass Rose Drive, E. Jacksonville, FL 32216		\$ 8.50
11/19	Johnson, S. R. 3931 Lochlaurel Drive Jacksonville, FL 32211		10.00
11/19	Johnson, V. R., Jr. 48 Hialeah Drive Orange Park, FL 32073		2.50
11/19	Jones, A. C., Jr. 2861 Spanish Cove Trail Jacksonville, FL 32217		12.50
11/19	Kidd, E. L. 1806 Ormond Road Jacksonville, FL 32211		5.50
11/19	Kiesler, J. L. 7843 Bellemeade Blvd., S. Jacksonville, FL 32211		8.50
11/19	Kopicki, R. J. 1023 Holly Lane Jacksonville, FL 32207		10.00
11/19	Kreitzman, D. O. 8032 Jaguar Drive Jacksonville, FL 32210		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 11/2/84 through 12/14/84Page 9 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Kuhn, D. B. 3201 Hidden Lake Drive, E. Jacksonville, FL 32216		\$ 5.00
11/19	Lanier, H. A. 7061 Old Kings Road, S., No. 95 Jacksonville, FL 32217		3.00
11/19	Laws, E. S. 3894 University Club Boulevard Jacksonville, FL 32211		2.50
11/19	Leddon, C. D. 4323 Fern Creek Drive Jacksonville, FL 32211		12.50
11/19	Lee, H. W. 410 Booth Street Callahan, FL 32011		1.00
11/19	Liggett, R. D. 10132 Deerwood Club Drive Jacksonville, FL 32216		12.50
11/19	Lockamy, A. R. 507 Sycamore Shoals Louisville, KY 40223		8.37
11/19	Logan, G. S. 2704 W. Ivywood Road Florence, S. C. 29501		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 11/2/84 through 12/14/84Page 10 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Lucas, A. J., Jr. 4 Ponte Vedra Circle Ponte Vedra Beach, FL 32082		\$ 2.50
11/19	Ludwig, K. J 1068 Cherry Street Jacksonville, FL 32205		5.00
11/19	McConnell, T. O. 225 11th Street Atlantic Beach, FL 32233		8.50
11/19	McCormack, W. C. 1081 Arbor Lane Jacksonville, FL 32207		10.00
11/19	McNeill, G. M. 1714 Damon Drive Florence, S.C. 29501		10.00
11/19	Meadow, C. D. 3916 Mamarneck Road Louisville. KY 40218		2.00
11/19	Mercado, B. D. 1105 Knoll Drive, West Jacksonville, FL 32205		1.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 11/2/84 through 12/14/84Page 11 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Minter, A. W. 4905 Lofty Pines Circle, W Jacksonville, FL 32210		\$ 8.50
11/19	Moore, G. H., Jr. 8880 Old Kings Road, S., Apt. 92 Jacksonville, FL 32217		8.50
11/19	Mott, G. B. 848 Cedar Street Jacksonville, FL 32207		10.00
11/19	Nesmith, B. N., Jr. 2618 Kingston Drive Florence, S.C. 29501		5.00
11/19	Nicol, R. M. 3918 Tara Hall Drive Jacksonville, FL 32211		15.00
11/19	Pair, J. R. 3602 Kiki Court Louisville, KY 40219		5.00
11/19	Parker, B. L. 5366 Margaret Street Orange Park, FL 32073		1.00
11/19	Phillips, B. S. 6165 Briarforest Road, N. Jacksonville, FL 32211		2.50

15. Campaign Treasurer's Initials



16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 11/2/84 through 12/14/84Page 12 of 19 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Phillips, R. W. 6165 Briarforest Road, N. Jacksonville, FL 32211		\$ 2.50
11/19	Pierce, W. D., Jr. 8252 Haverhill Street Jacksonville, FL 32211		4.00
11/19	Poole, C. D. 1208 Catalina Road, E. Jacksonville, FL 32216		10.00
11/19	Prince, B. T. 6312 Long Meadow Road Charlotte, N.C. 28210		5.00
11/19	Pursley, F. E. 2737 Christopher Creek Road, N. Jacksonville, FL 32217		8.50
11/19	Ramseur, D. H. 3940 Marianna Road Jacksonville, FL 32217		2.50
11/19	Reeves, W. M., Jr. 4357 Heaven Trees Road Jacksonville, FL 32207		5.00
15. Campaign Treasurer's Initials 		16. Candidate or Chairman's Initials 	

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 11/2/84 through 12/14/84Page 13 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Renfro, W. W., Jr. 8605 Perry Road Louisville, KY 40222		\$ 10.00
11/19	Reynolds, J. L., Jr. 1111 Oak Vale Drive Jacksonville, FL 32217		2.50
11/19	Rice, J. T. 1471 Satsuma Road Jacksonville, FL 32223		2.50
11/19	Samuels, F. N. 202 Lanark Dell Louisville, KY 40243		.50
11/19	Smith, Gary W. 421 Kaelin Drive Louisville, KY 40207		5.00
11/19	Smith, T. L. 7945 Pine Lake Road Jacksonville, FL 32216		8.50
11/19	Spencer, P. L. 8839 Heavengate Lane Jacksonville, FL 32217		.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 11/2 through 12/14/84

Page 14 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Summers, J. R. 3500 University Blvd., N., Apt. 1103 Jacksonville, FL 32211		\$ 2.50
11/19	Swani, P. 9435 Lita Road Jacksonville, FL 32217		1.50
11/19	Talley, B. E. 714 Clearview Madisonville, KY 42431		5.00
11/19	Tapp, J. D., Jr. 1132 Carlotta Road, W. Jacksonville, FL 32211		5.00
11/19	Thornton, W. A. 2465 Lofberg Drive Jacksonville, FL 32216		10.00
11/19	Tichenor, R. R. 9204 Trenta Lane Fern Creek, KY 40291		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 11/2/84 through 12/14/84Page 15 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Tillis, E. E. 410 Tweed Avenue Seffner, FL 33584		\$ 5.00
11/19	Torbett, A. P. 926 Sandalwood Drive Richardson, Texas 75080		2.50
11/19	Vaughan, J. H. Route 1, Box 365-D Midland, N.C. 28107		5.00
11/19	Vaught, W. H. Route 4, Box 263 Floyds Knobs, IN 47119		5.00
11/19	Villademoros, S. 2535 Rogero Road Jacksonville, FL 32211		2.50
11/19	Ward, K. C. 556 Lake Road Ponte Vedra Beach, FL 32082		8.50
11/19	Watson, S. T. 831 Park Avenue Florence, S.C. 29501		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 11/2/84 through 12/14/84Page 16 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Weas, L. J. 7921 Jamaica Road, N. Jacksonville, FL 32216		\$ 8.75
11/19	White, H. G. 3262 Fruitwood Lane Jacksonville, FL 32211		10.00
11/19	White, J. M. 4385 Phillips Place Jacksonville, FL 32207		10.00
11/19	Whitfield, W. E. 500 Water Street Jacksonville, FL 32202		5.00
11/19	Widner, Larry E. 4038 Sabel Drive Jacksonville, FL 32211		2.50
11/19	Williams, J. E. 730 Bordeaux Avenue, W. Jacksonville, FL 32211		8.50
11/19	Wodehouse, C.J.O., Jr. 4116 Ponte Vedra Blvd. Jacksonville Beach, FL 32250		8.34

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 11/2/84 through 12/14/84Page 17 of 19 Pages

I. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Youngblood, J. L. 11864 Mandarin Forest Drive Jacksonville, FL 32223		\$ 5.00
11/19	Key, R. L., Jr. 3380 Knight Street Jacksonville, FL 32205		4.17
11/19	York, J. C. 15 Kentucky Street Wildwood, FL 32785		5.00
11/9	Rankin, C. C. 5612 Cynthia Drive Fern Creek, KY 40291		50.00
11/9	Wingate, W. F. 8444 Lamanto Avenue, S. Jacksonville, FL 32211		50.00
11/19	Parmer, H.W. Route 1 Roopville, GA 30170		100.00
11/19	Love, L. C. 7511 Broadview Dr. Newburgh, IN 47630		50.00
11/30	Oct., Nov. checking account interest		16.22

15. Campaign Treasurer's Initials

CPSL

Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS

Report covering the period of 11/2/84 through 12/14/84

- Continued

Page 18 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
11/19	Blalock, W. M. 737 Canary Drive Charleston, South Carolina 29407		\$ 10.00
11/19	Engel, A. C. 112 Maple Roselle, ILL 60172		2.50
11/19	Miller, Ralph 1138 Morean Circle, W Orange Park, FL 32073		8.50
11/19	Mosley, C. D. 312 Brandy Run Road Mobile, AL 36608		7.50
11/19	Oaks, J. C. 1227 Forest Circle Drive Corbin, KY 40701		8.34
11/19	Rosenberger, C. M. 3520 Sandburg Road Jacksonville, FL 32223		10.00
11/19	Shepherd, D. H. 173 Citation Trail Jacksonville, FL 32250		8.37
11/19	Taliaferro, L. K. 1474 Lakewood Drive Jacksonville, FL 32223		1.50
15. Campaign Treasurer's Initials <i>CRB</i>		16. Candidate or Chairman's Initials <i>[Signature]</i>	

CAMPAIGN TREASURER'S REPORT EXPENDITURES

(Section 106.07(4) Florida Statutes)

Report covering the period of 11/2/84 through 12/14/84 Page 1 of 1 Pages

Instructions — Complete information in Items 1 through 15. In Item 11, Expenditure Information, enter full name and address of each person to whom expenditures have been made, the amount, date and purpose of each expenditure. Items 14 and 15 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right hand corner.

1. Name—Candidate or Committee Action Cte.-State Seaboard System Railroad Political/		2. Candidate For N/A	
3. Street Address 500 Water Street	4. City Jacksonville	5. State FL	6. Zip Code 32202
7. Expenditures Previously Reported, Year to Date			\$ 18,925.00
8. Expenditures This Report			\$ 1,200.00
9. Total Expenditures To Date of This Report (line 7 and 8)			\$ 20,125.00

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
11/19	Transfer of funds to Seaboard System Railroad PAC-Federal		\$1,200.00

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Political Committee
(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Cte-State		2. Party N/A	
3. Candidate For: (add District, Circuit or Group) N/A		4. Address 500 Water Street	
5. City Jacksonville	6. County Duval	7. State FL	8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida _____ Duval _____ County

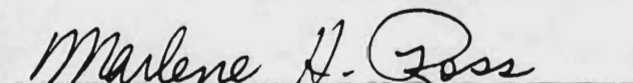
I, A. P. Woodward _____, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 19 pages of receipts and 1 pages of expenditures, upon each which I have written
my initials, covering the period of 12/15/84 through 12/31/84 is
complete, true and correct.



Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 10TH day of JANUARY A.D., 1985

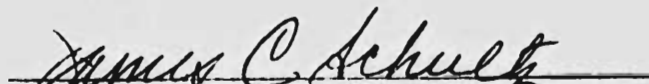
(seal)
My commission expires _____
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires Mar. 22, 1987
Bonded thru Patterson-Becht Agency



Notary Public

State of Florida _____ Duval _____ County

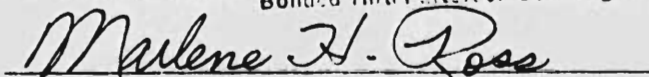
I, James C. Schultz _____, being duly sworn, depose (affirm) and say that this report
containing 19 pages of receipts and 1 pages of expenditures, upon each which I have written
my initials, covering the period of 12/15/84 through 12/31/84 is
complete, true and correct.



Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 10TH day of JANUARY A.D., 1985

(seal)
My commission expires _____
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires Mar. 22, 1987
Bonded thru Patterson-Becht Agency



Notary Public

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Article 106.07(1) Florida Statutes)

Report covering the period 12/15/84 through 12/31/84

Page 1 of 19 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name—Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate for NA	
3. Street Address 500 Water Street, B-4		4. City Jacksonville	5. State Florida
		6. Zip Code 32202	

SUMMARY OF CONTRIBUTIONS	Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1982 <small>*(Political Committees Only)</small>		
7. Contributions Previously Reported Year to Date	\$12,771.26	
8. Contributions This Report—Monetary	1,023.40	XXXXXX
9. Contributions This Report—"In-Kind"	XXXXXX	
10. Total Contributions To Date of this Report	\$13,794.66	

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Adams, J. I. 3769 Julington Creek Road Jacksonville, FL 32223		\$ 10.00
12/19	Adamson, J. R. 7316 Poinciana Avenue Jacksonville, FL 32217		5.00
12/19	Alderson, J. T., Jr. 3007 Tiger Hole Road Jacksonville, FL 32216		4.00
12/19	Arnold, D. J. 3463 Kildare Drive Birmingham, AL 35226		5.00
12/19	Bailey, J. K. 8605 Maidstone Court Raleigh, N. C. 27612		5.00
12/19	Bates, J. H. Route 2, Box 423-B1 Powell, TN 37849		5.00
12/19	Becker, R. C. 3434 Sara Drive Jacksonville, FL 32211		5.00
12/19	Bell, C. F. 9313 Cypress Shores Lane Jacksonville, FL 32217		6.00

15. Campaign Treasurer's Initials 	16. Candidate or Chairman's Initials
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CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 12/15/84 through 12/31/84

Page 2 of 19 Pages

1. Name — Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Bitter, D. H. 1822 Selva Grande Drive Atlantic Beach, FL 32233		\$ 8.50
12/19	Blaes, E. J. 1010 Talley Road Chattanooga, TN 37411		5.00
12/19	Bond, R. L. 3100 Warren Court Glen Allen, VA 23060		2.50
12/19	Bozard, J. D. 2474 Boquette Avenue Jacksonville, FL 32217		4.16
12/19	Brooks, H. L., Jr. 4159 Churchwell Road Jacksonville, FL 32210		8.50
12/19	Bullard, R. L. 4705 Wadham Lane Jacksonville, FL 32210		8.34
12/19	Burton, C. J., Jr. Station Court, Lot 62 P. O. Box 57 Brooks, KY 40109		5.00
12/19	Busby, G. W. 400 Tallapoosa Street Montgomery, AL 36104		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 12/15/84 through 12/31/84Page 3 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

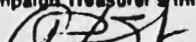

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Casey, S. B. 8000 Baymeadows Circle, E., Apt. 1 Jacksonville, FL 32216		\$ 10.00
12/19	Cash, T. B. 7210 White Birch Drive Jacksonville, FL 32211		6.00
12/19	Charron, E. A. 13877 Pleasant Valley Drive Jacksonville, FL 32225		10.00
12/19	Chick, G. F. 4455 Confederate Point Road, 6K Jacksonville, FL 32210		5.00
12/19	Christon, C. 12318 Muscovy Drive Jacksonville, FL 32223		8.50
12/19	Cole, Emried D., Jr. 11354 Oak Landings Drive Jacksonville, FL 32225		4.16
12/19	Cole, Wandaleen P. 11354 Oak Landings Drive Jacksonville, FL 32225		4.17
12/19	Cooper, Jack M. 7987 Hunter Grove Road Jacksonville, FL 32216		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Councill, R. J. 3126 Bridlewood Lane Jacksonville, FL 32217		\$ 2.50
12/19	Crowe, J. L. 1239 Montevideo Road Jacksonville, FL 32216		10.00
12/19	Currier, L. F. 1927 Selva Marine Drive Atlantic Beach, FL 32233		8.50
12/19	Davis, J. C. 1601 Booth Street Waycross, GA 31501		1.50
12/19	Downes, T. A., Jr. 28 Old Brick Road New City, New York 10956		2.50
12/19	Dufford, K. C. 2212 Miller Oaks Court Jacksonville, FL 32217		8.50
12/19	Dumestre, M. J. 411 Cumberland Avenue Gulf Breeze, FL 32561		2.50
15. Campaign Treasurer's Initials 		16. Candidate or Chairman's Initials 	

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 12/15/84 through 12/31/84

Page 5 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
			\$
12/19	Edel, E. E. 8915 Rearden Road Richmond, Virginia 23229		12.50
12/19	Frame, R. E. 2839 Wood Valley Court Jacksonville, FL 32217		5.00
12/19	Fryar, J. H., Jr. 2279 Seminole Beach Road Atlantic Beach, FL 32233		5.00
12/19	Fuson, J. F. 1204 Jamaica Court Jacksonville, FL 32216		7.50
12/19	Galbreath, L. L. 1169 Morgan Circle, E. Orange Park, FL 32073		1.00
12/19	Gremillion, R. J. 3506 Pirogue Road Jeffersontown, KY 40299		2.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 12/15/84 through 12/31/84Page 6 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Haines, W. E. 2775 Sunnybrook Road Jacksonville, FL 32216		\$ 2.50
12/19	Hamilton, R. H. 8953 Chiswick Court Jacksonville, FL 32217		8.50
12/19	Harvin, H. W. 7106 Arlet Drive Jacksonville, FL 32211		5.00
12/19	Haulter, Robert J. 2574 Oakview Drive Jacksonville, FL 32216		8.50
12/19	Hawkins, R. F. 308 Dobbin Road Webster Grove, Mo. 63119		6.00
12/19	Helms, J.D.H., Jr. 1231 Lamanto Avenue, E. Jacksonville, FL 32211		2.50
12/19	Hemphill, D. W. 4717 Avon Lane Jacksonville, FL 32210		2.50
12/19	Hensley, W. T. 8470 San Clemente Drive Jacksonville, FL 32217		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

 Report covering the period of 12/15/84 through 12/31/84

 Page 7 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Herde, E. W. 3948 Hickory Grove Drive Jacksonville, FL 32211		\$ 11.00
12/19	Hesler, W. D. 5752 Wilcrest Circle, S. Jacksonville, FL 32211		8.50
12/19	Holcomb, E. E. 11308 Beacon Drive Jacksonville, FL 32225		10.00
12/19	Huband, G. E. 1252 Campbell Circle Jacksonville, FL 32207		5.00
12/19	Hyers, K. K. 5417 Cary Street Richmond, VA 23226		10.00
12/19	Ingoldsby, J. H. 4317 Sage Oak Court Jacksonville, FL 32211		6.50
12/19	Ingram, C. J. 5224 Robert Scott Drive, S. Jacksonville, FL 32207		5.50
12/19	Jameson, M. L. 6119 Sack Drive, N. Jacksonville, FL 32216		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 12/15 through 12/31/84Page 8 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Janowski, M. D. 3516 Compass Rose Drive, E. Jacksonville, FL 32216		\$ 8.50
12/19	Johnson, S. R. 3931 Lochlaurel Drive Jacksonville, FL 32211		10.00
12/19	Johnson, V. R., Jr. 48 Hialeah Drive Orange Park, FL 32073		2.50
12/19	Jones, A. C., Jr. 2861 Spanish Cove Trail Jacksonville, FL 32217		12.50
12/19	Kidd, E. L. 1806 Ormond Road Jacksonville, FL 32211		5.50
12/19	Kiesler, J. L. 7843 Bellemeade Blvd., S. Jacksonville, FL 32211		8.50
12/19	Kopicki, R. J. 1023 Holly Lane Jacksonville, FL 32207		10.00
12/19	Kreitzman, D. O. 8032 Jaguar Drive Jacksonville, FL 32210		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 12/15/84 through 12/31/84Page 9 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Kuhn, D. B. 3201 Hidden Lake Drive, E. Jacksonville, FL 32216		\$ 5.00
12/19	Lanier, H. A. 7061 Old Kings Road, S.; No. 95 Jacksonville, FL 32217		3.00
12/19	Laws, E. S. 3894 University Club Boulevard Jacksonville, FL 32211		2.50
12/19	Leddon, C. D. 4323 Fern Creek Drive Jacksonville, FL 32211		12.50
12/19	Lee, H. W. 410 Booth Street Callahan, FL 32011		1.00
12/19	Liggett, R. D. 10132 Deerwood Club Drive Jacksonville, FL 32216		12.50
12/19	Lockamy, A. R. 507 Sycamore Shoals Louisville, KY 40223		8.37
12/19	Logan, G. S. 2704 W. Ivywood Road Florence, S. C. 29501		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 12/15/84 through 12/31/84Page 10 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Lucas, A. J., Jr. 4 Ponte Vedra Circle Ponte Vedra Beach, FL 32082		\$ 2.50
12/19	Ludwig, K. J 1068 Cherry Street Jacksonville, FL 32205		5.00
12/19	McConnell, T. O. 225 11th Street Atlantic Beach, FL 32233		8.50
12/19	McCormack, W. C. 1081 Arbor Lane Jacksonville, FL 32207		10.00
12/19	McNeill, G. M. 1714 Damon Drive Florence, S.C. 29501		10.00
12/19	Meadow, C. D. 3916 Mamarneck Road Louisville. KY 40218		2.00
12/19	Mercado, B. D. 1105 Knoll Drive, West Jacksonville, FL 32205		1.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT — CONTRIBUTIONS — Continued

Report covering the period of 12/15/84 through 12/31/84

Page 11 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Minter, A. W. 4905 Lofty Pines Circle, W Jacksonville, FL 32210		\$ 8.50
12/19	Moore, G. H., Jr. 8880 Old Kings Road, S., Apt. 92 Jacksonville, FL 32217		8.50
12/19	Mott, G. B. 848 Cedar Street Jacksonville, FL 32207		10.00
12/19	Nesmith, B. N., Jr. 2618 Kingston Drive Florence, S.C. 29501		3.50
12/19	Nicol, R. M. 3918 Tara Hall Drive Jacksonville, FL 32211		15.00
12/19	Pair, J. R. 3602 Kiki Court Louisville, KY 40219		5.00
12/19	Parker, B. L. 5366 Margaret Street Orange Park, FL 32073		1.00
12/19	Phillips, B. S. 6165 Briarforest Road, N. Jacksonville, FL 32211		2.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 12/1/84 through 12/31/84

Page 12 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Phillips, R. W. 6165 Briarforest Road, N. Jacksonville, FL 32211		\$ 2.50
12/19	Pierce, W. D., Jr. 8252 Haverhill Street Jacksonville, FL 32211		4.00
12/19	Poole, C. D. 1208 Catalina Road, E. Jacksonville, FL 32216		10.00
12/19	Prince, B. T. 6312 Long Meadow Road Charlotte, N.C. 28210		5.00
12/19	Pursley, F. E. 2737 Christopher Creek Road, N. Jacksonville, FL 32217		8.50
12/19	Ramseur, D. H. 3940 Marianna Road Jacksonville, FL 32217		2.50
12/19	Reeves, W. M., Jr. 4357 Heaven Trees Road Jacksonville, FL 32207		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 12/15/84 through 12/31/84

Page 13 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Renfroe, W. W., Jr. 8605 Perry Road Louisville, KY 40222		\$ 10.00
12/19	Reynolds, J. L., Jr. 1111 Oak Vale Drive Jacksonville, FL 32217		2.50
12/19	Rice, J. T. 1471 Satsuma Road Jacksonville, FL 32223		2.50
12/19	Samuels, F. N. 202 Lanark Dell Louisville, KY 40243		.50
12/19	Smith, Gary W. 421 Kaelin Drive Louisville, KY 40207		5.00
12/19	Smith, T. L. 7945 Pine Lake Road Jacksonville, FL 32216		8.50
12/19	Spencer, P. L. 8839 Heavengate Lane Jacksonville, FL 32217		.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - Continued

Report covering the period of 12/1/84 through 12/31/84

Page 14 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Summers, J. R. 3500 University Blvd., N., Apt. 1103 Jacksonville, FL 32211		\$ 2.50
12/19	Swani, P. 9435 Lita Road Jacksonville, FL 32217		1.50
12/19	Talley, B. E. 714 Clearview Madisonville, KY 42431		5.00
12/19	Tapp, J. D., Jr. 1132 Carlotta Road, W. Jacksonville, FL 32211		5.00
12/19	Tichenor, R. R. 9204 Trenta Lane Fern Creek, KY 40291		5.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

 Report covering the period of 12/15/84 through 12/31/84

 Page 15 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Tillis, E. E. 410 Tweed Avenue Seffner, FL 33584		\$ 5.00
12/19	Torbett, A. P. 926 Sandalwood Drive Richardson, Texas 75080		2.50
12/19	Vaughan, J. H. Route 1, Box 365-D Midland, N.C. 28107		5.00
12/19	Vaught, W. H. Route 4, Box 263 Floyds Knobs, IN 47119		5.00
12/19	Villademoros, S. 2535 Rogero Road Jacksonville, FL 32211		2.50
12/19	Ward, K. C. 556 Lake Road Ponte Vedra Beach, FL 32082		8.50
12/19	Watson, S. T. 831 Park Avenue Florence, S.C. 29501		4.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 12/15/84 through 12/31/84Page 16 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Weas, L. J. 7921 Jamaica Road, N. Jacksonville, FL 32216		\$ 8.75
12/19	White, H. G. 3262 Fruitwood Lane Jacksonville, FL 32211		10.00
12/19	White, J. M. 4385 Phillips Place Jacksonville, FL 32207		10.00
12/19	Whitfield, W. E. 500 Water Street Jacksonville, FL 32202		5.00
12/19	Widner, Larry E. 4038 Sabel Drive Jacksonville, FL 32211		2.50
12/19	Williams, J. E. 730 Bordeaux Avenue, W. Jacksonville, FL 32211		8.50
12/19	Wodehouse, C.J.O., Jr. 4116 Ponte Vedra Blvd. Jacksonville Beach, FL 32250		8.34

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS — Continued

Report covering the period of 12/15/84 through 12/31/84Page 17 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Youngblood, J. L. 11864 Mandarin Forest Drive Jacksonville, FL 32223		\$ 5.00
12/19	Key, R. L., Jr. 3380 Knight Street Jacksonville, FL 32205		4.17
12/19	York, J. C. 15 Kentucky Street Wildwood, FL 32785		5.00
12/26	Walters, S. W. 8024 Southside Blvd., Apt. 188 Jacksonville, FL 32216		100.00
12/26	Snyder, H. L. 904 Parkridge Circle, W Jacksonville, FL 32211		100.00
12/31	Daniel, A. M. 1222 Grandview Dr. Jacksonville, FL 32211		37.50
12/30	December checking account interest		.73

15. Campaign Treasurer's Initials

ABSL

16. Candidate or Chairman's Initials

JL

86040595296

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS

Report covering the period of 12/15/84 through 12/31/84

- Continued

Page 18 of 19 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Blalock, W. M. 737 Canary Drive Charleston, South Carolina 29407		\$ 10.00
12/19	Engel, A. C. 112 Maple Roselle, ILL 60172		2.50
12/19	Miller, Ralph 1138 Morean Circle, W Orange Park, FL 32073		8.50
12/19	Mosley, C. D. 312 Brandy Run Road Mobile, AL 36608		7.50
12/19	Oaks, J. C. 1227 Forest Circle Drive Corbin, KY 40701		8.34
12/19	Rosenberger, C. M. 3520 Sandburg Road Jacksonville, FL 32223		10.00
12/19	Shepherd, D. H. 173 Citation Trail Jacksonville, FL 32250		8.37
12/19	Taliaferro, L. K. 1474 Lakewood Drive Jacksonville, FL 32223		1.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—CONTRIBUTIONS

- Continued

Report covering the period of 12/15/84 through 12/31/84Page 19 of 19 Pages

1. Name—Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
12/19	Williams, J. T. 12334 Hidden Hills Lane Jacksonville, FL 32225		\$ 10.00
12/19	Wilson, R. K. 6228 Lake Tahoe Drive Jacksonville, FL 32216		7.50
12/19	Estill, L. E. 264 Arbor Lane Bloomington, Illinois 60108		10.00

15. Campaign Treasurer's Initials

APSL

16. Candidate or Chairman's Initials

JS

CAMPAIGN TREASURER'S REPORT EXPENDITURES

(Section 108.07(4) Florida Statute)

Report covering the period of 12/15/84 through 12/31/84 Page 1 of 1 Pages

Instructions — Complete information in Items 1 through 13. In Item 11, Expenditure Information, enter full name and address of each person to whom expenditures have been made, the amount, date and purpose of each expenditure. Items 14 and 15 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right hand corner.

1. Name—Candidate or Committee Seaboard System Railroad Political Action/		2. Candidate For N/A	
3. Street Address 500 Water Street		4. City Jacksonville	5. State FL
		6. Zip Code 32202	
7. Expenditures Previously Reported, Year to Date			\$ 20,125.00
8. Expenditures This Report			\$ 125.00
9. Total Expenditures To Date of This Report (line 7 and 8)			\$ 20,250.00

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
12/31	A. P. Woodward 2445 Community Road Jacksonville, FL 32207	4th Quarter Accounting Services	\$ 125.00

14. Campaign Treasurer's Initials <i>[Signature]</i>	15. Candidate or Chairman's Initials <i>[Signature]</i>
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SEABOARD SYSTEM RAILROAD POLITICAL ACTION COMMITTEE-STATE
500 Water Street
Jacksonville, Florida 32202

April 9, 1985

Division of Elections
Department of State
Capitol Building
Tallahassee, Florida 32301

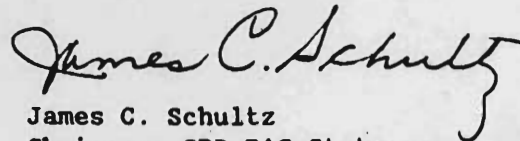
RE: SBD PAC - State

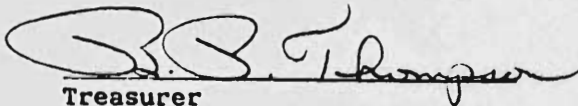
Gentlemen:

This is to advise you of the change in Treasurer of the Seaboard System Railroad Political Action Committee-State.

Effective February 1, 1985, Ms. B. P. Thompson became Treasurer and Ms. A. P. Woodward will be Assistant Treasurer.

Yours very truly,


James C. Schultz
Chairman, SBD PAC-State


Treasurer


Assistant Treasurer

85040595300

CAMPAIGN TREASURER'S REPORT

Report of Contribution Receipts and Expenditures

For A

Candidate or Committee

(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee

Seaboard System Railroad Political Action Committee-State

2. Party

N/A

3. Candidate For: (Add District, Circuit or Group)

N/A

4. Street Address

500 Water Street

5. City

Jacksonville

6. County

Duval

7. State

FL

8. Zip Code

32202

Verification By Oath or Affirmation

State of Florida

Duval

County

I, B. P. Thompson

(Please Type or Print)

, being duly sworn, depose (affirm) and say that this report

containing 18 pages of receipts and 2 pages of expenditures, upon each which I have written my

initials, covering the period of 1/01/85 through 3/31/85

is complete, true and correct.

B. P. Thompson

Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this

9th

day of

April

A.D., 19 85

(seal)

James C. Schultz

Notary Public

Notary Public, State of Florida

My commission expires

My Commission Expires July 19, 1988

Bonded Thru Troy Fain - Insurance, Inc.

State of Florida

Duval

County

I, James C. Schultz

, being duly sworn, depose (affirm) and say that this report

containing 18 pages of receipts and 2 pages of expenditures, upon each which I have written

my initials, covering the period of 1/01/85 through 3/31/85

is complete, true and correct.

James C. Schultz

Signature of Candidate of
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this

9th

day of

April

A.D., 19 85

(seal)

Barbara W. Benson

Notary Public

My commission expires

June 11,

19 86

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statutes)

Report covering the period **1/01/85** through **3/31/85**

Page **1** of **18** Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.11(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name — Committee Seaboard System Railroad Political Action/		2. Candidate for N/A	
3. Street Address 500 Water Street, E-4		4. City Jacksonville	5. State Florida
		6. Zip Code 32202	

SUMMARY OF CONTRIBUTIONS		Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1984 <small>*(Political Committees Only)</small>		969.96	
7. Contributions Previously Reported Year to Date		0	
8. Contributions This Report—Monetary		2,373.86	xxxxxx
9. Contributions This Report—"In-Kind"		xxxxxx	
10. Total Contributions To Date of this Report		2,373.86	

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/29	Adamson, J. R. 7316 Poinciana Avenue Jacksonville, FL 32217		15.00
3/29	Alderson, J. T., Jr. 3007 Tiger Hole Road Jacksonville, FL 32216		12.00
3/29	Arnold, D. J. 3463 Kildare Drive Birmingham, AL 35226		15.00
3/29	Ashmead, L. L. 170 Crane's Lake Drive Ponte Vedra Beach, FL 32082		8.50
3/29	Bailey, J. K. 8605 Maidstone Court Raleigh, NC 27612		15.00
3/29	Bates, J. H. Route 2, Box 423-B1 Powell, TN 37849		15.00
3/29	Becker, R. C. 3434 Sara Drive Jacksonville, FL 32211		15.00
3/29	Birkholz, F. R. 4201 Sidewinder Trail Middleburn, FL 32068		16.67

15. Campaign Treasurer's Initials 	16. Candidate or Chairman's Initials
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1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Bitter, D. H. 1822 Selva Grande Drive Atlantic Beach, FL 32233		25.50
3/29	Blaes, E. J. 1010 Talley Road Chattanooga, TN 37411		15.00
3/29	Blalock, W. M. 737 Canary Dr. Charleston, SC 29407		30.00
3/29	Bond, R. L. 3100 Warren Court Glen Allen, VA 23060	\$	7.50
3/29	Bozard, J. D. 2474 Boquette Avenue Jacksonville, FL 32217		12.50
3/29	Brooks, H. L., Jr. 4159 Churchwell Road Jacksonville, FL 32210		25.50
3/29	Bullard, R. L. 4705 Wadham Lane Jacksonville, FL 32210		25.00
3/29	Burton, C. J., Jr. Station Court, Lot 62 P. O. Box 57 Brooks, KY 40109		15.00

15. Campaign Treasurer's Initials

lpt

16. Candidate or Chairman's Initials

[Signature]

86040595303

CAMPAIGN TREASURER'S REPORT -- CONTRIBUTIONS -- (Continued)

Report covering the period of 1/01/85 through 3/31/85

Page 3 of 10 Pages

1. Name -- Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Busby, G. W. 400 Tallapoosa Street Montgomery, AL 36104		7.50
3/29	Casey, S. B. 8000 Baymeadows Circle, E., Apt. 1 Jacksonville, FL 32216		10.00
3/29	Cash, T. B. 7210 White Birch Drive Jacksonville, FL 32211		18.00
3/29	Charron, E. A. 13877 Pleasant Valley Drive Jacksonville, FL 32225		30.00
3/29	Chick, G. F. 4455 Confederate Point Road, 6K Jacksonville, FL 32210		15.00
3/29	Christon, C. 12318 Muscovy Drive Jacksonville, FL 32223		25.50
3/29	Cole, Emried D., Jr. 11354 Oak Landings Drive Jacksonville, FL 32225		12.50
3/29	Cole, Wandaleen P. 11354 Oak Landings Drive Jacksonville, FL 32225		12.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

1. Name--Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Cooper, Jack M. 7987 Hunter Grove Road Jacksonville, FL 3216		15.00
3/29	Councill, R. J. 3126 Bridlewood Lane Jacksonville, FL 32217		7.50
3/29	Crowe, J. L. 1239 Montevideo Road Jacksonville, FL 32216		30.00
3/29	Currier, L. F. 1927 Selva Marine Drive Atlantic Beach, FL 32233		25.50
3/29	Davis, J. C. 1601 Booth Street Waycross, GA 31501		4.50
3/29	Downes, T. A., Jr. 28 Old Brick Road New City, NY 10956		7.50
3/29	Dufford, K. C. 2212 Miller Oaks Court Jacksonville, FL 32217		25.50
3/29	Edel, E. E. 8915 Rearden Road Richmond, VA 23229		37.50
15. Campaign Treasurer's Initials <i>hpt</i>		16. Candidate or Chairman's Initials <i>JS</i>	

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS (Continued)
 Report covering the period of 1/01/85 through 3/31/85

Page 5 of 18 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Engel, A. C. 112 W. Maple Roselle, IL 60172		7.50
3/29	Estill, L. E. 264 Arbor Lane Bloomington, IL 60008		30.00
3/29	Foster, H. W., Jr. 3419 Limewood Drive Jacksonville, FL 32217		16.67
3/29	Frame, R. E. 2839 Wood Valley Court Jacksonville, FL 32217		15.00
3/29	Fryar, J. H., Jr. 2279 Seminole Beach Road Atlantic Beach, FL 32233		15.00
3/29	Fuson, J. F. 1204 Jamaica Court Jacksonville, FL 32216		24.50
3/29	Galbreath, L. L. 1169 Morgan Circle, E. Orange Park, FL 32073		3.00
3/29	Gremillion, R. J. 3506 Pirogue Road Jeffersontown, KY 40299		6.00

15. Campaign Treasurer's Initials

hpt

16. Candidate or Chairman's Initials

[Signature]

86040595306

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Haines, W. E. 2775 Sunnybrook Road Jacksonville, FL 32216		7.50
3/29	Hamilton, R. H. 8953 Chiswick Court Jacksonville, FL 32217		25.50
3/29	Harvin, H. W. 7106 Arlet Drive Jacksonville, FL 32211		15.00
3/29	Haulter, Robert J. 2574 Oakview Drive Jacksonville, FL 32216	#	25.50
3/29	Hawkins, R. F. 308 Dobbin Road Webster Grove, MO 63119		18.00
3/29	Helms, J. D. H., Jr. 1231 Lamanto Avenue, E. Jacksonville, FL 32211		7.50
3/29	Hemphill, D. W. 4717 Avon Lane Jacksonville, FL 32210		10.00
3/29	Hensley, W. T. 8470 San Clemente Drive Jacksonville, FL 32217		7.50

15. Campaign Treasurer's Initials

lpt

16. Candidate or Chairman's Initials

[Signature]

85040595307

CAMPAIGN THE ASSURERS SUPPORT CONTRIBUTIONS -- Continued
 Report covering the period of 1/01/85 through 3/31/85

Page 7 of 13 Pages

1. Name --Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Herde, E. W. 3948 Hickory Grove Drive Jacksonville, FL 32211		33.00
3/29	Hesler, W. D. 5752 Wildcrest Circle, S. Jacksonville, FL 32211		25.50
3/29	Holcomb, E. E. 11308 Beacon Drive Jacksonville, FL 32225		30.00
3/29	Huband, G. E. 1252 Campbell Circle Jacksonville, FL 32207		15.00
3/29	Hyers, K. L. 5417 Cary Street Richmond, VA 23226		30.00
3/29	Ingoldsby, J. H. 4317 Sage Oak Court Jacksonville, FL 32211		19.50
3/29	Ingram, C. J. 5224 Robert Scott Drive, S. Jacksonville, FL 32207		16.50
3/29	Jameson, M. L. 6119 Sack Drive, N. Jacksonville, FL 32216		12.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Janowski, M. D 3516 Compass Rose Drive, E. Jacksonville, FL 32216		25.50
3/29	Johnson, S. R. 3931 Lochlaurel Drive Jacksonville, FL 32211		30.00
3/29	Johnson, V. R., Jr. 48 Hialeah Drive Orange Park, FL 32073		2.50
3/29	Jones, A. C., Jr. - 2861 Spanish Cove Trail Jacksonville, FL 32217		37.50
3/29	Key, R. L., Jr. 3380 Knight St. Jacksonville, FL 32205		12.51
3/29	Kidd, E. L. 1806 Ormond Road Jacksonville, FL 32211		16.50
3/29	Kielser, J. L. 7843 Bellemcade Blvd., S. Jacksonville, FL 32211		25.50
3/29	Kopicki, R. J. 1023 Holly Lane Jacksonville, FL 32207		30.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Kreitzman, D. O. 8032 Jaguar Drive Jacksonville, FL 32210		15.00
3/29	Kuhn, D. B. 3201 Hidden Lake Drive, E. Jacksonville, FL 32216		15.00
3/29	Lanier, H. A. 7061 Old Kings Road, S., No. 95 Jacksonville, FL 32217		15.00
3/29	Laws, E. S. 3894 University Club Boulevard Jacksonville, FL 32211		7.50
3/29	Leddon, C. D. 4323 Fern Creek Drive Jacksonville, FL 32211		37.50
3/29	Lee, H. W. 410 Booth Street Callahan, FL 32011		3.00
3/29	Liggett, R. D. 10121 Deerwood Club Drive Jacksonville, FL 32216		37.50
3/29	Lockamy, A. R. 507 Sycamore Shoals Louisville, KY 40223		25.13

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN THE ASSEMBLY TO PORT CONTRIBUTIONS -- Continued
 Report covering the period of 1/01/85 through 3/31/85

Page 10 of 13 Pages

1. Name--Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
3/29	Logan, G. S. 2704 W. Ivywood Road Florence, SC 29501		7.50
3/29	Lucas, A. J., Jr. 4 Ponte Vedra Circle Ponte Vedra Beach, FL 32082		7.50
3/29	Ludwig, K. J. 1068 Cherry Street Jacksonville, FL 32205		15.00
3/29	McConnell, T. O. 225 11th Street Atlantic Beach, FL 32233	#	25.50
3/29	McCormack, W. C. 1081 Arbor Lane Jacksonville, FL 32207		30.00
3/29	McNeill, G. M. 1714 Damon Drive Florence, SC 29501		30.00
3/29	Meador, C. D. 3916 Mamarneck Road Louisville, KY 40218		6.00
3/29	Mercado, B. D. 1105 Knoll Drive, West Jacksonville, FL 32205		4.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Miller, R. 1138 Morgan Circle, W. Orange Park, FL 32073		25.50
3/29	Minter, A. W. 4905 Lifty Pines Circle, W. Jacksonville, FL 32210		25.50
3/29	Moore, G. H., Jr. 8880 Old Kings Road, S., Apt. 92 Jacksonville, FL 32217		25.50
3/29	Mosley, C. D. 312 Brandy Run Road Mobile, AL 36608		22.50
3/29	Mott, G. B. 848 Cedar Street Jacksonville, FL 32207		30.00
3/29	Nesmith, B. N., Jr. 2618 Kingston Drive Florence, S. C. 29501		15.50
3/29	Nicol, R. M. 3918 Tara Hall Drive Jacksonville, FL 32211		45.00
3/29	Oaks, J. C. 1227 Forest Circle Drive Corbin, KY 40701		25.00

15. Campaign Treasurer's Initials

[Signature]

16. Candidate or Chairman's Initials

[Signature]

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - (Continued)
 Report covering the period of 1/01/85 through 3/31/85

Page 12 of 13 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of in Kind Contributions	14. Amount
3/29	Pair, J. R. 3602 Kiki Court Louisville, KY 40219		15.00
3/29	Parker, B. L. 5366 Margaret Street Orange Park, FL 32073		3.00
3/29	Phillips, B. S. 6165 Briarforest Road, N. Jacksonville, FL 32211		7.50
3/29	Phillips, R. W. 6165 Briarforest Road, N. Jacksonville, FL 32211		7.50
3/29	Pierce, W. D., Jr. 8252 Haverhill Street Jacksonville, FL 32211		12.00
3/29	Pilgrim, R. D. 1365 Edgewood Ave., S. Jacksonville, FL 32205		17.00
3/29	Poole, C. D. 1208 Cataline Road, E. Jacksonville, FL 32216		30.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN FINANCIAL DISCLOSURE ACT - CONTRIBUTIONS

Report covering the period of 1/01/85 through 3/31/85

Page 13 of 13 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Prince, B. T. 6312 Long Meadow Road Charlotte, NC 28210		15.00
3/29	Pursley, F. E. 2737 Christopher Creek Road, N. Jacksonville, FL 32217		25.50
3/29	Ramseur, D. H. 3940 Marianna Road Jacksonville, FL 32217		7.50
3/29	Reeves, W. M., Jr. 4357 Heaven Trees Road Jacksonville, FL 32207		5.00
3/29	Renfroe, W. W., Jr. 8605 Perry Road Louisville, KY 40222		30.00
3/29	Reynolds, J. L., Jr. 1111 Oak Vale Drive Jacksonville, FL 32217		7.50
3/29	Rice, J. T. 1471 Satsuma Road Jacksonville, FL 32223		7.50
3/29	Rosenberger, C. M. 3520 Sandburg Road Jacksonville, FL 32223		30.00

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT - CONTRIBUTIONS - (Continued)
 Report covering the period of 1/01/85 through 3/31/85

Page 14 of 18 Pages

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Samuels, F. N. 202 Lanark Dell Louisville, KY 40243		1.50
3/29	Schultz, J. C. 903 Oriental Gardens Road Jacksonville, FL 32207		8.50
3/29	Shepherd, D. H. 173 Citation Trail Corbin, KY 40701		25.12
3/29	Smith, Gary W. 421 Kaelin Drive Louisville, KY 40207		15.00
3/29	Spencer, P. L. 8839 Heavengate Lane Jacksonville, FL 32217		.50
3/29	Summers, J. R. 3500 University Blvd., N., Apt. 1103 Jacksonville, FL 32211		7.50
3/29	Swani, P. 9435 Lita Road Jacksonville, FL 32217		4.50
3/29	Taliaferro, L. K. 1474 Lakewood Drive Jacksonville, FL 32223		4.50

15. Campaign Treasurer's Initials

[Signature]

16. Candidate or Chairman's Initials

[Signature]

85040525315

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11. Date	12. Contributor Information	13. Description of In Kind Contributions	14. Amount
3/29	Talley, B. E. 714 Clearview Madisonville, KY 42431		15.00
3/29	Tapp, J. D., Jr. 1132 Carlotta Road, W. Jacksonville, FL 32211		15.00
3/29	Tichenor, R. R. 9204 Trenta Lane Fern Creek, KY 40291		5.00
3/29	Tillis, E. E. 410 Tweed Avenue Seffner, FL 33584	#	15.00
3/29	Torbett, A. P. 926 Sandalwood Drive Richardson, TX 75080		7.50
3/29	Vaughan, J. H. Route 1, Box 365, D Midland, NC 28107		15.00
3/29	Vaught, W. H. Route 4, Box 263 Floyds Knobs, IN 47119		15.00
3/29	Villadenoros, S. 2535 Rogero Road Jacksonville, FL 32211		7.50

15. Campaign Treasurer's Initials

16. Candidate or Chairman's Initials

86040595316

1. Name - Candidate or Committee

Seaboard System Railroad Political Action Committee-State

11 Date	12 Contributor Information	13 Description of In Kind Contributions	14 Amount
3/29	Ward, K. C. 556 Lake Road Ponte Vedra Beach, FL 32082		25.50
3/29	Watson, S. T. 831 Park Avenue Florence, SC 29501		12.00
3/29	Weas, L. J. 7921 Jamaica Road, N. Jacksonville, FL 32216		26.25
3/29	White, H. G. 3262 Fruitwood Lane Jacksonville, FL 32211		10.00
3/29	White, J. M. 4385 Phillips Place Jacksonville, FL 32207		30.00
3/29	Whitfield, W. E. 500 Water Street Jacksonville, FL 32202		15.00
3/29	Widener, Larry E. 4038 Sabel Drive Jacksonville, FL 32211		7.50
3/29	Williams, J. E. 730 Bordeau Avenue, W. Jacksonville, FL 32211		25.50

15. Campaign Treasurer's Initials

[Signature]

16. Candidate or Chairman's Initials

[Signature]

CAMPAIGN FINANCIAL REPORT EXPENDITURES

(Section 106.074, Florida Statutes)

Report covering the period of 1/01/85 through 3/31/85 Page 1 of 2 Pages

Instructions - Complete information in Items 1 through 13. In Item 11, Expenditure Information, enter full name and address of each person to whom expenditures have been made, the amount, date and purpose of each expenditure. Items 14 and 15 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right hand corner.

1. Name - Candidate or Committee Committee-State Seaboard System Railroad Political Action		2. Candidate For N/A	
3. Street Address 500 Water Street		4. City Jacksonville	5. State Florida
			6. Zip Code 32202
7. Expenditures Previously Reported, Year to Date			\$
8. Expenditures This Report			\$ 2,430.05
9. Total Expenditures To Date of This Report (line 7 and 8)			\$ 2,430.05
10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
2/6	Committee for John G. Dicks, III P. O. Box 247 Chesterfield, VA 23832	Coal Slurry Committee	\$ 100.00
2/6	Friends of Claude "Buddy" Leach P. O. Box 117 Leesville, LA 71446	General Election Deficit	300.00
2/6	Friends of Bill Baxley P. O. Drawer 17279 Montgomery, AL 36117	Appreciation Reception	250.00
3/15	Friends of Tom Drake P. O. Box 733 Montgomery, AL 36101	General Election Debt	250.00
3/15	Senate Republican Caucus 313 War Memorial Building Nashville, TN 37219	Fund Raiser	100.00
3/15	House Republic Caucus 104 War Memorial Building Nashville, TN 37219	Fund Raiser	100.00
14. Campaign Treasurer's Initials <i>[Signature]</i>		15. Candidate or Chairman's Initials <i>[Signature]</i>	

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CAMPAIGN TREASURER'S REPORT -- EXPENDITURES -- Continued
 Report covering the period of 1/01/85 through 3/31/85

Page 2 of 2 Pages

1. Name -- Candidate or Committee

Seaboard System Railroad Political Action Committee-State

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
3/15	Friends of McWherter 19 Legislative Plaza Nashville, TN 37219	Fund Raiser	\$ 500.00
3/15	Joint Democratic Caucus War Memorial Building Nashville, TN 37219	Fund Raiser	200.00
3/18	Frank Miller Campaign Route 5, Box 248 Bowling Green, KY 42101	Campaign Debt	200.00
3/18	Ben Handy Campaign 1442 S. 3rd Street Louisville, KY 40208	Defray Campaign Debt	200.00
3/27	Axselle Campaign Committee 5501 Staples Mill Road Richmond, VA 23228	Reception for Virginia Delegate	100.00
3/29	B. P. Thompson 4328 Plaza Gate Lane, No. 202 Jacksonville, FL 32217	Accounting Services for 1st Quarter	125.00
	February Bank Service Charges		5.05

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT
Report of Contribution Receipts and Expenditures
For A
Candidate or Committee
(Section 106.07, Florida Statutes)

1. Full Name of Candidate or Committee Seaboard System Railroad Political Action Committee-State		2. Party N/A
3. Candidate For: (Add District, Circuit or Group) N/A		4. Street Address 500 Water Street
5. City Jacksonville	6. County Duval	7. State Florida
		8. Zip Code 32202

Verification By Oath or Affirmation

State of Florida Duval County

I, B. P. Thompson, being duly sworn, depose (affirm) and say that this report
(Please Type or Print)
containing 1 pages of receipts and 2 pages of expenditures, upon each which I have written my
initials, covering the period of April 1, 1985 through June 30, 1985
is complete, true and correct.

B. P. Thompson
Signature of Campaign Treasurer

Subscribed and sworn to (affirmed) before me this 8th day of July A.D., 1985

(seal)

Id B. Steward
Notary Public
NOTARY PUBLIC, STATE OF FLORIDA
My commission expires Sept. 25, 1987
My commission expires Bonded Thru Patterson-Bechtel Agency

State of Florida Duval County

I, James C. Schultz, being duly sworn, depose (affirm) and say that this report
containing 1 pages of receipts and 2 pages of expenditures, upon each which I have written
my initials, covering the period of April 1, 1985 through June 30, 1985 is
complete, true and correct.

James C. Schultz
Signature of Candidate or
Political Committee Chairman

Subscribed and sworn to (affirmed) before me this 8th day of July A.D., 1985

(seal)

Barbara W. Denson
Notary Public
My commission expires June 11, 1986

NOTE: The candidate and his campaign treasurer in the case of a candidate or the political committee chairman and campaign treasurer of the committee in the case of a political committee shall certify as to the correctness of each report.

CAMPAIGN TREASURER'S REPORT CONTRIBUTIONS

(Section 106.07(1) Florida Statute)

Report covering the period 4/01/85 through 6/30/85

Page 1 of 1 Pages

INSTRUCTIONS — Complete information in Items 1 through 16. Monetary contributions are to be listed in Column A, and "In-Kind" contributions are to be listed in Column B of Items 7, 8, 9, and 10. In Item 12, enter the full name, address, occupation if any. If the contribution is \$100 or less or from a relative as defined in Sec. 116.111(1)(c) F.S. Provided the relationship is reported, the occupation need not be listed and only the name and address is necessary. Fill in Item 13 if the contribution was "In-Kind." Items 15 and 16 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right-hand corner.

1. Name— Seaboard System Railroad Political Action/		2. Candidate for N/A	
3. Street Address 500 Water Street, E, 4		4. City Jacksonville	5. State Florida
		6. Zip Code 32202	
SUMMARY OF CONTRIBUTIONS		Column A Monetary	Column B "In-Kind"
Balance as of December 31, 1984 <small>*(Political Committees Only)</small>			
7. Contributions Previously Reported Year to Date		\$ 2,373.86	
8. Contributions This Report—Monetary		5,994.38	XXXXXX
9. Contributions This Report—"In-Kind"		XXXXXX	
10. Total Contributions To Date of this Report		\$ 8,368.24	
11. Date	12. Contributor Information	13. Description of In-Kind Contributions	14. Amount
4/23	Transfer from Seaboard System Railroad Political Action Committee-Federal		\$ 2,250.00
6/11	Transfer from Seaboard System Railroad Political Action Committee-Federal		3,700.00
6/28	Checking Account Interest		44.38
15. Campaign Treasurer's Initials <i>lpt</i>		16. Candidate or Chairman's Initials <i>JS</i>	

85040395322

CAMPAIGN TREASURER'S REPORT EXPENDITURES

(Section 108.07(4) Florida Statutes)

Report covering the period of 4/01/85 through 6/30/85 Page 1 of 2 Pages

Instructions — Complete information in Items 1 through 15. In Item 11, Expenditure Information, enter full name and address of each person to whom expenditures have been made, the amount, date and purpose of each expenditure. Items 14 and 15 must be initialed for the report to be accepted. Use continuation sheets as necessary and number in upper right hand corner.

1. Name—Candidate or Committee Committee—State		2. Candidate For	
Seaboard System Railroad Political Action/		N/A	
3. Street Address	4. City	5. State	6. Zip Code
500 Water Street, E-4	Jacksonville	Florida	32202
7. Expenditures Previously Reported			\$ 2,430.05
8. Expenditures This Report			\$ 1,025.00
9. Total Expenditures To Date of This Report (line 7 and 8)			\$ 3,455.05

10. Date	11. Expenditure Information	12. Purpose of Expenditure	13. Amount
5/6	John Ford Campaign Committee Room 7, Legislative Plaza Nashville, TN. 37219	Fund-raiser reception for retirement of campaign debt	\$ 100.00
5/6	Robert C. Scott Campaign P. O. Box 251 Newport News, VA	Primary	200.00
5/6	Abbitt for the House P. O. Box 189 Appomattox, VA 24522	Primary	100.00
5/6	Mary Sue Terry Campaign P. O. Drawer 369 Stuart, VA	General	100.00
5/22	Howard E. Copeland Re-Election Campaign 8592 Granby Street Norfolk, VA 23503	Primary	200.00
6/25	Loyd Coleman Campaign Fund P. O. Box 67 Arab, AL 35016	General Campaign	100.00

14. Campaign Treasurer's Initials

15. Candidate or Chairman's Initials

CAMPAIGN TREASURER'S REPORT—EXPENDITURES — Continued
Report covering the period of 4/01/85 through 6/30/85

Page 2 of 2 Pages

Seaboard System Railroad Political Action Committee-State

14. Campaign Treasurer's Initials <i>RLT</i>	15. Candidate or Chairman's Initials <i>RG</i>
---	---

WILEY & REIN

1776 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

WRITER'S DIRECT DIAL NUMBER

(202) 429-7330

September 24, 1985

Ms. Maura White
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20006

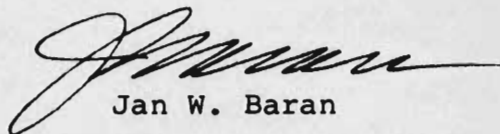
Re: MUR 2077 (Seaboard System Railroad Political
Action Committee -- State & Federal)

Dear Ms. White:

This office represents the Seaboard System Railroad Political Action Committees in the above-captioned matter. Enclosed please find an executed Statement of Designation of Counsel.

Pursuant to our telephone conversation today, I hereby confirm that I will meet with you and Assistant General Counsel, Lois Lerner, at 2:00 p.m., Monday, September 30, 1985 at your offices. I appreciate this opportunity to meet with you to discuss this matter.

Sincerely,



Jan W. Baran

JWB/njl

Enclosure

3 6 0 4 0 5 5 3 2 5

SEP 27 11:44

RECEIVED

STATEMENT OF DESIGNATION OF COUNSEL

MUR 2077

NAME OF COUNSEL: Mr. Jan Baran

ADDRESS: Wiley & Rein
1776 K Street, NW -- 10th Floor
Washington, DC 20006

TELEPHONE: 202/429-7000

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

9/20/85
Date

James C. Ahealy
Signature

RESPONDENT'S NAME: Political Action Committee

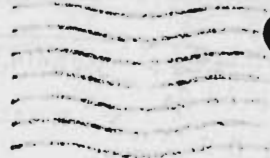
ADDRESS: Seaboard System Railroad
500 Water Street
Jacksonville, FL 32202

HOME PHONE: _____

BUSINESS PHONE: 904/359-1207

LEY & REIN

776 K STREET, N. W.
WASHINGTON, D. C. 20006



Ms. Maura White
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. ~~██████~~

8 5 0 4 0 3 9 3 2 7



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 5, 1985

Seaboard System Railroad
Political Action Committee-State
500 Water Street
Jacksonville, Florida 32202

RE: MUR 2077
Seaboard System Railroad
Political Action Committee-State

Dear Sir or Madam:

On August 28, 1985 the Federal Election Commission determined that there is reason to believe the Seaboard System Railroad Political Action Committee-State violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.5(a)(1)(i). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

Letter to Seaboard System Railroad
Political Action Committee-State
Page 2

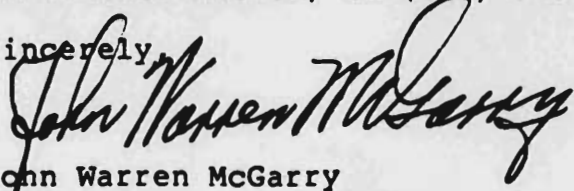
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,


John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

136040595329



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 5, 1985

Beverly Thompson, Treasurer
Seaboard System Railroad
Political Action Committee-Federal
500 Water Street
Jacksonville, Florida 32202

RE: MUR 2077
Seaboard System Railroad
Political Action Committee-Federal;
Beverly Thompson, as treasurer

Dear Ms. Thompson:

On August 28, 1985, the Federal Election Commission determined that there is reason to believe the Seaboard System Railroad Political Action Committee-Federal and you, as treasurer, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.5(a)(1)(i). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-

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Letter to Beverly Thompson, Treasurer
Page 2

probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

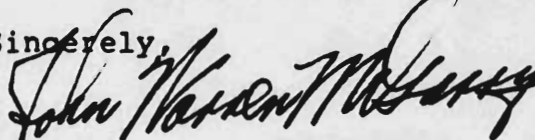
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

186040795331

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) RAD Referral 85L-33
Seaboard System Railroad)
Political Action Committee-)
Federal)
Beverly Thompson, as treasurer)
Seaboard System Railroad)
Political Action Committee-)
State)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 28, 1985, the Commission decided by a vote of 6-0 to take the following actions in RAD Referral 85L-33:

1. Open a Matter Under Review.
2. Find reason to believe the Seaboard System Railroad Political Action Committee-Federal and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).
3. Find reason to believe the Seaboard System Railroad Political Action Committee-State violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).
4. Approve the letters and General Counsel's Factual and Legal Analyses attached to the First General Counsel's Report signed August 22, 1985.

Commissioners Aikens, Elliott, Harris, Josefiak, McDonald and McGarry voted affirmatively in this matter.

Attest:

F-29-P5

Date

Judy C. Ransom

for Marjorie W. Emmons
Secretary of the Commission

86040595332

FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 8-23-85 5:00p.m. RAD Referral 85 AUG 23 3 5:26 Staff Maura White

SOURCE OF MUR: RAD Referral

RESPONDENTS' NAMES: Seaboard System Railroad
Political Action Committee-Federal;
Beverly Thompson, as treasurer;

Seaboard System Railroad
Political Action Committee-State

RELEVANT STATUTE: 2 U.S.C. § 441b(a) and
11 C.F.R § 102.5(a)(1)(i)

INTERNAL REPORTS CHECKED: Public records

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

The Seaboard System Railroad Political Action Committee - Federal ("Federal Committee") was referred to the Office of the General Counsel by the Reports Analysis Division ("RAD") on July 17, 1985 (Attachment 1).

FACTUAL AND LEGAL ANALYSIS

(A) The Facts

The 1984 March Monthly Report filed by the Federal Committee disclosed the receipt of \$2,250 on February 3, 1984, from the Seaboard System Railroad Political Action Committee - State ("State Committee").^{1/} The State Committee is the non-federal account of Seaboard System Railroad. A Request for Additional Information ("RFAI") was sent by RAD to the Federal Committee on April 9, 1985, advising that the transfer of funds into a federal

^{1/} The Federal Committee's 1984 March Monthly Report (2-1-84 through 2-29-84) disclosed \$1,520.08 in cash-on-hand at the end of the reporting period.

SENSITIVE

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account from a non-federal account is prohibited by 11 C.F.R. § 102.5(a)(1)(i). The RFAI recommended the refund of the full amount of the contribution to the non-federal account.

On April 22, 1985, W. Edward Whitfield, secretary of the Federal Committee, called a staff member of RAD to discuss the RFAI dated April 9, 1985. Mr. Whitfield stated that he was not aware of the prohibition against the transfer of funds from a non-federal account into a federal account, and that he would immediately refund \$2,250 to the non-federal account and send a copy of the refund check. In addition, Mr. Whitfield noted that the Committee's response to an RFAI that was sent concerning an omitted Schedule A on the 30 Day Post-General Report would indicate that the Committee had received another transfer of \$3,700 from the non-federal account. Mr. Whitfield stated that upon receipt of notification from the Commission he would issue a refund of \$3,700 to the non-federal account.

On April 25, 1985, the Committee submitted its response to the RFAI dated April 9, 1985. The response included a copy of a check drawn on the Federal Committee's account and payable to the State Committee. The check was in the amount of \$2,250 and dated April 23, 1985. The 1985 May Monthly Report of the Federal Committee disclosed the above refund to the State Committee.

The Federal Committee's response of April 25, 1985, referenced its receipt of \$3,700 from the State Committee and noted that "[u]pon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify

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the transfer." On April 26, 1985, the Federal Committee submitted an amended 30 Day Post-General Report which disclosed the receipt of \$3,700 from the State Committee on November 18, 1984.^{2/} An RFAI was sent to the Federal Committee on May 8, 1985, advising that the full amount of the contribution should be returned to the State Committee. A second notice was sent to the Federal Committee on May 30, 1985, for failure to respond to the original RFAI. On June 5, 1985, the Federal Committee's treasurer telephoned a staff member of RAD and stated the Federal Committee would issue a \$3,700 refund to the State Committee within the next few days. On June 17, 1985, the Federal Committee responded to the RFAI and second notice by providing a copy of a refund check dated June 11, 1985, from the Federal Committee to the State Committee in the amount of \$3,700. The Federal Committee's 1984 July Monthly Report disclosed the refund of \$3,700 to the State Committee on June 11, 1985.

(B) The applicable law

Pursuant to 11 C.F.R § 102.5(a)(1)(i), an organization which finances political activity in connection with both federal and non-federal elections shall deposit into its federal account only funds subject to the prohibitions and limitations of the Federal

^{2/} The Federal Committee's 1984 Post-General Election Report (10-18-84 through 11-26-84) disclosed \$388.80 in cash-on-hand at the end of the reporting period.

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Election Campaign Act of 1971, as amended. In addition, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. Id.

As set forth at 2 U.S.C. § 441b(a) corporations and labor organizations are prohibited from making contributions or expenditures in connection with federal elections, and political committees are prohibited from knowingly accepting or receiving any contribution prohibited under 2 U.S.C. § 441b(a).

(C) Application of the law to the facts

The record in this matter demonstrates that the Federal Committee accepted two contributions totalling \$5,950 from the State Committee during 1984. Although the contributions from the State Committee were refunded by the Federal Committee 14 months and 7 months, respectively, after the Federal Committee's receipt, such contributions were not refunded within a reasonable time, in the view of this office. See 11 C.F.R. § 103.3. It further appears that the monies in the State Committee's account constituted commingled funds in that corporate and labor union contributions are permissible for use in state election campaigns under Florida state law. See 2 U.S.C. § 441b(a). In view of the foregoing it is the recommendation of this office that the Commission open a matter under review and find reason to believe the Federal Committee and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i) by

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accepting transfers from the State Committee, and that the State Committee violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i) by making transfers to the Federal Committee.

RECOMMENDATIONS

1. Open a Matter Under Review
2. Find reason to believe the Seaboard System Railroad Political Action Committee-Federal and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).
3. Find reason to believe the Seaboard System Railroad Political Action Committee - State violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).
4. Approve the attached letters and General Counsel's Factual and Legal Analyses.

Charles N. Steele
General Counsel

August 22, 1985
Date

BY:

Kenneth A. Gross
Associate General Counsel

Attachments

- 1- RAD Referral
- 2- Proposed letters and analyses (2)

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REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 17 July 1985

ANALYST: Lisa J. Stolaruk

I. COMMITTEE: Seaboard System Railroad Political
Action Committee-Federal (C00007831)
Beverly Thompson, Treasurer
(February 1, 1985-present)
Aileen P. Woodward, Treasurer
(January 1, 1983-February 1, 1985)
500 Water Street
Jacksonville, FL 32202

II. RELEVANT STATUTE: 11 CFR 102.5(a)(1)(i)

III. BACKGROUND:

Receipt of Funds from Non-Federal Account

The 1984 March Monthly Report filed by the Seaboard System Railroad Political Action Committee-Federal ("the Committee") disclosed a \$2,250 transfer-in on February 3, 1984, from Seaboard System Railroad Political Action Committee-State, an apparent non-Federal account maintained by the Committee (Attachment 2). A Request for Additional Information ("RFAI") was sent on April 9, 1985, advising the Committee that 11 CFR 102.5(a)(1)(i) prohibits a Federal account of a committee from accepting funds from an account maintained by the committee for non-Federal activity. The RFAI further recommended that the full amount of the transfer-in should be refunded to the non-Federal account (Attachment 3).

Mr. W. Edward Whitfield, secretary of the Committee, called the Reports Analysis Division ("RAD") analyst on April 22, 1985, to discuss the RFAI. Mr. Whitfield stated that he was not aware of the prohibition against transferring funds from a non-Federal account to a Federal account, but that he would immediately refund \$2,250 to the non-Federal account and send a copy of the check. In addition, Mr. Whitfield noted that the Committee's response to an RFAI that was sent concerning an omitted Schedule A on the 30 Day Post-General Report would indicate that the

SEABOARD SYSTEM RAILROAD POLITICAL
ACTION COMMITTEE-FEDERAL
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Committee had received another transfer of \$3,700 from its non-Federal account. Mr. Whitfield stated that, upon notification by the Commission, he would issue a second check in the amount of \$3,700 to the Committee's non-Federal account (Attachment 4).

The Committee submitted a response to the RFAI on April 23, 1985, which included a copy of a check in the amount of \$2,250 as a refund to its non-Federal account (Attachment 5). The check was dated April 23, 1985. The 1985 May Monthly Report filed by the Committee confirmed this refund (Attachment 6).

The April 23rd response also referenced the \$3,700 transfer-in from the Committee's non-Federal account which would be disclosed on its amended 30 Day Post-General Report and stated that "Upon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify the transfer" (Attachment 5). On April 24, 1985, the Committee submitted an amended 30 Day Post-General Report which disclosed the receipt of \$3,700 on November 18, 1984, from its non-Federal account (Attachment 7).

An RFAI was sent on May 8, 1985, advising the Committee of the prohibitions of 11 CFR 102.5(a)(1)(i) and that the full amount of the transfer should be returned to the non-Federal account (Attachment 8). A Second Notice was sent to the Committee on May 30, 1985 for failure to respond to the original RFAI (Attachment 9).

On June 5, 1985, Ms. Beverly Thompson, treasurer of the Committee, called the RAD analyst and stated that the Federal account would issue a \$3,700 check to the non-Federal account within the next few days. She further stated that the Committee would forward a copy of the check to the Commission (Attachment 10).

The Committee's response, received June 17, 1985, included a copy of a check dated June 11, 1985 and made payable to its non-Federal account in the amount of \$3,700 (Attachment 11).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

1(3)

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (83-84)

DATE 9JUL85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
SEABOARD SYSTEM RAILROAD POLITICAL ACTION COMMITTEE-FEDERAL CONNECTED ORGANIZATION: CSX CORPORATION				NON-PARTY QUALIFIED	ID #C00007031	
1983	STATEMENT OF ORGANIZATION - AMENDMENT			23MAR83	3	83FEC/268/3764
	FEBRUARY MONTHLY	1,523	500	1JAN83 -31JAN83	4	83FEC/266/4366
	MARCH MONTHLY	202	1,750	1FEB83 -28FEB83	4	83FEC/268/3775
	APRIL MONTHLY	1,620	1,021	1MAR83 -31MAR83	5	83FEC/271/0253
	MAY MONTHLY	13	2,500	1APR83 -30APR83	4	83FEC/271/4832
	JUNE MONTHLY	1,588	1,750	1MAY83 -31MAY83	4	83FEC/274/0873
	JULY MONTHLY	1,099	250	1JUN83 -30JUN83	4	83FEC/277/30
	AUGUST MONTHLY	1,834	2,500	1JUL83 -31JUL83	4	83FEC/282/06
	SEPTEMBER MONTHLY	163	250	1AUG83 -31AUG83	4	83FEC/283/0019
	OCTOBER MONTHLY	1,882	1,750	1SEP83 -30SEP83	4	83FEC/284/0015
	NOVEMBER MONTHLY	84	250	1OCT83 -31OCT83	4	83FEC/287/1542
	DECEMBER MONTHLY	1,618	1,500	1NOV83 -30NOV83	4	83FEC/288/4877
	YEAR-END	55	0	1DEC83 -31DEC83	3	84FEC/290/4328
1984	STATEMENT OF ORGANIZATION - AMENDMENT			17FEB84	2	84FEC/297/0567
	STATEMENT OF ORGANIZATION - AMENDMENT			22MAR84	1	84FEC/306/0374
	FEBRUARY MONTHLY	785	1,000	1JAN84 -31JAN84	4	84FEC/297/0604
	MARCH MONTHLY	3,084	1,650	1FEB84 -29FEB84	5	84FEC/306/0376
	MARCH MONTHLY - AMENDMENT	-	-	1FEB84 -29FEB84	3	85FEC/372/1531
	REQUEST FOR ADDITIONAL INFORMATION			1FEB84 -29FEB84	3	85FEC/369/5196
	APRIL MONTHLY	951	1,250	1MAR84 -31MAR84	4	84FEC/312/2486
	MAY MONTHLY	770	1,750	1APR84 -30APR84	4	84FEC/315/0097
	JUNE MONTHLY	845	1,000	1MAY84 -31MAY84	4	84FEC/318/0553
	JULY MONTHLY	740	750	1JUN84 -30JUN84	4	84FEC/323/0277
	AUGUST MONTHLY	770	750	1JUL84 -31JUL84	4	84FEC/325/2242
	SEPTEMBER MONTHLY	1,432	0	1AUG84 -31AUG84	3	84FEC/328/4468
	OCTOBER MONTHLY	888	2,350	1SEP84 -30SEP84	4	84FEC/344/0113
	PRE-GENERAL	825	0	1OCT84 -17OCT84	3	84FEC/347/2112
	POST-GENERAL	5,993	6,500	18OCT84 -26NOV84	5	84FEC/356/5118
	POST-GENERAL - AMENDMENT	5,993	6,500	18OCT84 -26NOV84	4	85FEC/372/15
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	3	85FEC/375/4
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84	1	85FEC/369/5
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84	3	85FEC/373/0185
	REQUEST FOR ADDITIONAL INFORMATION 2ND			18OCT84 -26NOV84	4	85FEC/374/5286
	YEAR-END	1,049	0	27NOV84 -31DEC84	3	85FEC/360/5198
TOTAL		29,813	0	31,021	0	122 TOTAL PAGES

All of the reports listed above have been reviewed.

Ending cash-on-hand as of 12/31/84: \$1,438

Debts owed by the Committee as of 12/31/84: \$0

ATTACHMENT 1
(page 1 of 2)

8 5 0 4 0 7 2 5 3 4 2
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 9JUL85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
SEABOARD SYSTEM RAILROAD POLITICAL ACTION COMMITTEE-FEDERAL CONNECTED ORGANIZATION: CSX CORPORATION				NON-PARTY QUALIFIED	ID #C00007831	
1985 STATEMENT OF ORGANIZATION - AMENDMENT				20FEB85	1	85FEC/366/5355
	FEBRUARY MONTHLY	871	0	1JAN85 -31JAN85	3	85FEC/366/5356
	MARCH MONTHLY	734	4	1FEB85 -28FEB85	3	85FEC/368/4120
	APRIL MONTHLY	782	4	1MAR85 -31MAR85	3	85FEC/371/4089
	MAY MONTHLY	1,553	2,250	1APR85 -30APR85	4	85FEC/374/0059
	JUNE MONTHLY	1,549	1,500	1MAY85 -31MAY85	4	85FEC/376/161
	TOTAL	5,489	0 3,758	0	18	TOTAL PAGE

None of these reports has received review.

Ending cash-on-hand as of 5/31/85: \$3,171.11

Debts owed by the Committee as of 5/31/85: \$0

ATTACHMENT 1
(page 2 of 2)

1(s)

1984 March Monthly Report

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1
 Also attach statement for each
 category of the Receipts
 (Summary Page)

Any information supplied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Seaboard System Railroad Political Action Committee-Federal

A. Full Name, Mailing Address and ZIP Code

**Seaboard System Railroad Political
Action Committee-State****500 Water Street****Jacksonville, FL 32202**Receipt For ☒ Primary ☐ General

Other (specify)

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

2/3/84

\$2,250.00

Aggregate Year-to-Date-\$ 2,250.00

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

Other (specify)

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

Other (specify)

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

Other (specify)

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

Other (specify)

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

Other (specify)

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

Other (specify)

Aggregate Year-to-Date-\$

SUBTOTAL - Receipts This Period

TOTAL This Period (list name this and number only)

1(6)
\$2,250.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

ATTACHMENT 3
(page 1 of 2)

RQ-2

B.P. Thompson, Treasurer
Seaboard System Railroad Political
Action Committee-Federal
500 Water Street
Jacksonville, FL 32202

APR 9 1985

Identification Number: C00007831

Reference: March Monthly Report (2/1/84-2/29/84)

Dear Mr. Thompson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses a receipt of \$2,250 from the Seaboard System Railroad Political Action Committee-State Committee (pertinent portion attached). Please clarify whether this transfer is from an account maintained by your committee for non-Federal activity. If so, be advised that such transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-Federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on a supporting Schedule B for Line 27 of your next report.

If, however, this transaction represents an "internal transfer" of funds from one Federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-Federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

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within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Lisa J. Stolaruk
Senior Reports Analyst
Reports Analysis Division

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ANALYST: Lisa Stolaruk

CONVERSATION WITH: Ed Whitfield

COMMITTEE: Seaboard System Railroad Political Action Cmte. - Federal

DATE: 4/22/85

SUBJECT(S): Receipts from non-Federal account

Mr. Whitfield called in response to an RFAI sent regarding a \$2,250 receipt from Seaboard System's non-Federal account. Mr. Whitfield apologized for the error and stated that he was not aware of the prohibition of transferring funds from a non-Federal account to the Federal account. He further stated that he would immediately issue a refund check to the non-Federal account and send a copy of the check.

I had also sent an RFAI on the committee's 30 Day Post-General Report for failure to provide a supporting schedule for a \$3,700 transfer-in. Mr. Whitfield noted that the \$3,700 also came from their non-Federal account. He stated that upon receipt of further notification by the Commission, he would issue a refund check in the amount of \$3,700.

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85 APR 25 P2:28



W. E. WHITFIELD
Counsel to President
Government Affairs

April 23, 1985

Ms. Lisa J. Stolaruk
Senior Reports Analyst
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: Identification Number: C00007831
March Monthly Report (2/1/84-2/29/84)

Dear Ms. Stolaruk:

Pursuant to our phone conversation, I am by this letter responding to your correspondence of April 9, 1985, to B. P. Thompson, Treasurer of the Seaboard-PAC. In your letter you advised that we violated 11 CFR 102.5 (a) (1) (i) by transferring \$2,250 from our State PAC to our Federal PAC.

To correct this situation, we have issued Seaboard PAC-Federal Check #192 payable to Seaboard PAC-State in the amount of \$2,250. A copy of that check is enclosed for your records.

If you will recall, I also mentioned that upon your receipt of Schedule A for our 30 Day Post-General Report (10/18/84-11/26/86) you would discover a transfer of \$3,700 from State PAC to our Federal PAC.

Upon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify the transfer.

Thank you for bringing this matter to our attention and you may be assured we will not make this mistake again.

Sincerely,

W. Edward Whitfield
Secretary, Seaboard-PAC

Enclosure

W.E.W.

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SEABOARD SYSTEM RAILROAD
POLITICAL ACTION COMMITTEE - FEDERAL

540 WATER ST
JACKSONVILLE, FL 32202

ATTACHMENT 5
(page 2 of 3)

92

April 23 1985

8: 70
630

PAY TO THE
ORDER OF Seaboard System Railroad Political Action Committee-State

\$ 2,250.00

Two-Thousand Two-Hundred-Fifty and 00/100-----

DOLLARS



FLAGSHIP BANK
OF JACKSONVILLE
MAIN OFFICE
JACKSONVILLE, FLORIDA

INTEREST CHECKING

B. S. Thompson

FOR

⑆000192⑆ ⑆00E30007C4⑆ 608 393315E⑆

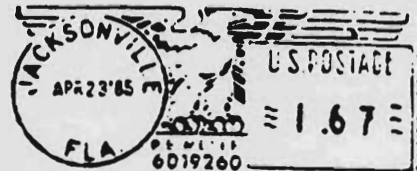
1 (11)

ATTACHMENT 5
(page 3 of 3)

SEABOARD SYSTEM RAILROAD

EXECUTIVE DEPARTMENT

500 Water Street • Jacksonville, Florida 32202



CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ms. Lisa J. Stolaruk
Senior Reports Analyst
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

CERTIFIED

514 602 768

MAIL



1(12)

55 APR 25 P 2: 28

1985 May Monthly Report
SCHEDULE B

ITEMIZED DISBURSEMENTS

ATTACHMENT 6

Page 1 of 1
Continuation Page

Any information obtained from such Reports and Statements may not be used by any person for the purpose of soliciting contributions for a commercial purpose, other than using the name and address of any person or committee on behalf of a candidate for election, and is confidential.

Name of Committee (in Full)
Seaboard System Railroad Political Action Committee-Federal

A. Full Name, Mailing Address and ZIP Code Seaboard System Railroad Political Action Committee-State 500 Water Street Jacksonville, FL 32202	Purpose of Disbursement To reimburse SBO-PAC-State account Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other (specify):	Date (month, day, year) 4/23/85	Amount of Each Disbursement This Period \$2,250.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			\$2,250.00

1(13)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

ATTACHMENT 7
(page 1 of 4)

REC

85 APR 26 11:37

HQ-2

APR 9 1985

B.P. Thompson, Treasurer
Seaboard System Railroad Political
Action Committee-Federal
500 Water Street
Jacksonville, FL 32202

Identification Number: C00007831

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Thompson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A, regardless of the amount. 2 U.S.C. §434(b)(3)(D).

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa J. Stolaruk
Senior Reports Analyst
Reports Analysis Division

*Ms. Stolaruk,
Schedule A
attached*

4/23/85

1(14)

2
1
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3
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9
9
3
3

(Summary Page)

85 A1:26 All: 13

AL MIN AREA

1. Name of Committee (in Full)

Seaboard System Railroad Political
Action Committee-Federal

Address (Number and Street)

500 Water Street

City, State and ZIP Code

Jacksonville, FL 32202

☐ Check here if address is different than previously reported

2. FEC Identification Number

C-00007831

☐ This committee qualified as a multicandidate committee during
the Reporting Period on

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid-year Report (Non-Election Year Only)

☐ Monthly Report

☐ Twelfth day report preceding

election of in the State of

☒ Thirtieth day report following the General Election

on 11/6/84 in the State of Florida

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

5. Covering Period 10/18/84 through 11/26/84

6. (a) Cash on hand January 1, 1984

(b) Cash on Hand at Beginning of Reporting Period

7. (a) Total Receipts (from Line 18)

(b) Subtotal (add Lines 6(a) and 6(b) for Column A and
Lines 6(a) and 6(b) for Column B)

8. Total Disbursements (from Line 28)

9. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(b))

10. Debts and Obligations Owed TO The Committee
(Itemize all on Schedule C or Schedule D)

11. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

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

A. P. Woodward

Type or Print Name of Treasurer

A. P. Woodward
SIGNATURE OF TREASURER

12/4/84
Date

For further information

Federal Election Commission

Toll Free 800 424 7430

Local 707 523 0250

NOTE: Submission of this statement is a prerequisite for the committee to be eligible to receive federal funds.

All previous versions of FEC FORM 3 and FEC FORM 3e are obsolete and should no longer be used.

1(15)

SCHEDULE A

ITEMIZED RECEIPTS

of 1 of 1
PAGE NUMBER 17
(Use separate schedule for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (on Full):
Seaboard System Railroad Political Action Committee-Federal

A. Full Name, Mailing Address and ZIP Code Seaboard System Railroad Political Action Committee-State 500 Water Street, Jax, FL 32202	Name of Employer: Occupation: Aggregate Year-to-Date - \$ 5,950.00	Date (month, day, year) 11/18/84	Amount of Each Receipt This Period \$3,700.00
Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
B. Full Name, Mailing Address and ZIP Code	Name of Employer: Occupation: Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
C. Full Name, Mailing Address and ZIP Code	Name of Employer: Occupation: Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
D. Full Name, Mailing Address and ZIP Code	Name of Employer: Occupation: Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
E. Full Name, Mailing Address and ZIP Code	Name of Employer: Occupation: Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
F. Full Name, Mailing Address and ZIP Code	Name of Employer: Occupation: Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
G. Full Name, Mailing Address and ZIP Code	Name of Employer: Occupation: Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)			
SUBTOTAL of Receipts This Period			
TOTAL This Period (not right side of page)			\$3,700.00

1(16)

SEABOARD SYSTEM RAILROAD
RISK MANAGEMENT DEPARTMENT
800 WATER STREET • JACKSONVILLE, FLORIDA 32202



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

CERTIFIED

514 602 788

MAIL

85 APR 25 AM 11:37

(17)



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20541

BU-2

B.P. Thompson, Treasurer
Seaboard System Railroad Political
Action Committee-Federal
300 Water Street
Jacksonville, FL 32202

M. 8 1985

Identification Number: C00007831

Reference: 30 Day Post-General Amended Report (10/18/84-
11/26/84)

Dear Mr. Thompson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses a receipt of \$3,700 from the Seaboard System Railroad Political Action Committee-State (pertinent portion attached). Please clarify whether this transfer is from an account maintained by your committee for non-Federal activity. If so, be advised that such transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-Federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on a supporting Schedule B for Line 27 of your next report.

If, however, this transaction represents an "internal transfer" of funds from one Federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-Federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need

1(18)

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Lisa J. Stolaruk
Senior Reports Analyst
Reports Analysis Division

86040373356
85733730195



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

RG-3

May 30, 1985

B. P. Thompson, Treasurer
Seaboard System Railroad Political
Action Committee - Federal
500 Water Street
Jacksonville, FL 32202

Identification Number: C00007831

Reference: 30 Day Post-General Amended Report (10/18/84-
11/26/84)

Dear Mr. Thompson:

This letter is to inform you that as of May 29, 1985, the Commission has not received your response to our request for additional information, dated May 8, 1985. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Lisa Stolaruk on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

1(20)

ANALYST: Lisa Stolaruk

CONVERSATION WITH: Beverly Thompson, Treasurer (904)359-3473

COMMITTEE: Seaboard System Railroad Political Action Cmte. - Federal

DATE: June 5, 1985

SUBJECT(S): Receipt from non-Federal account

Ms. Thompson called this morning to advise me that the Federal account was going to issue a check to their non-Federal account in the amount of \$3,700 within the next few days. She further stated that the committee would send us a copy of the check.

86040595358

1(21)

14 FEB

65 JUN 17 49:38



SEABOARD SYSTEM RAILROAD

500 Water Street - Jacksonville, Florida 32202

W. E. WHITFIELD
Counsel to President
Government Affairs

June 11, 1985

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 "K" Street, N.W.
Washington, DC 20463

Re: Identification Number: C00007831
30 Day Post-General Amended Report
(10/18/84 - 11/26/84)

Dear Mr. Gibson:

In your letters of May 8 and May 30, 1985, you advised that we violated 11 CFR 102.5(a)(1)(i) by transferring \$3,700 from our State PAC to our Federal PAC.

To correct this situation, we have issued Seaboard PAC - Federal Check #198, payable to Seaboard PAC - State, in the amount of \$3,700. A copy of that check is enclosed for your records.

Thank you for bringing this matter to our attention and you may be assured we will not make this mistake again.

Sincerely,

W. Edward Whitfield
Secretary, Seaboard PAC

Enclosure

1(22)

SEABOARD SYSTEM RAILROAD,
POLITICAL ACTION COMMITTEE - FEDERAL
S. WATER ST.
JACKSONVILLE, FLORIDA 32202

ATTACHMENT 11
(page 2 of 2)

198

June 11 19 85

6:11
PM

PAY TO THE
ORDER OF

Seaboard System Railroad Political Action Committee-State

\$ 3,700.00

Three Thousand Seven Hundred and 00/100

DOLLARS



FLAGSHIP BANK
OF JACKSONVILLE
BANK OFFICE
JACKSONVILLE, FLORIDA

FOR

B. B. Thompson

⑆000196⑆ ⑆063000704⑆ 606 3933156⑆

1(23)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Beverly Thompson, Treasurer
Seaboard System Railroad
Political Action Committee-Federal
500 Water Street
Jacksonville, Florida 32202

RE: MUR
Seaboard System Railroad
Political Action Committee-Federal;
Beverly Thompson, as treasurer

Dear Ms. Thompson:

On , 1985, the Federal Election Commission determined that there is reason to believe the Seaboard System Railroad Political Action Committee-Federal and you, as treasurer, violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.5(a)(1)(i). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you and the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-

Attachment 2(1)

Letter to Beverly Thompson, Treasurer
Page 2

probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

2(2)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENTS: Seaboard System Railroad Political Action
Committee - Federal;
Beverly Thompson, as treasurer

SUMMARY OF ALLEGATIONS

The Seaboard System Railroad Political Action Committee - Federal ("Federal Committee") accepted two contributions during 1984 totalling \$5,950 from the Seaboard System Railroad Political Action Committee - State ("State Committee") in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).

FACTUAL BASIS AND LEGAL ANALYSIS

(A) The Facts

The 1984 March Monthly Report filed by the Federal Committee disclosed the receipt of \$2,250 on February 3, 1984, from the State Committee.^{1/} The State Committee is the non-federal account of Seaboard System Railroad. A Request for Additional Information ("RFAI") was sent by RAD to the Federal Committee on April 9, 1985, advising that the transfer of funds into a federal account from a non-federal account is prohibited by 11 C.F.R. § 102.5(a)(1)(i). The RFAI recommended the refund of the full amount of the contribution to the non-federal account.

On April 22, 1985, W. Edward Whitfield, secretary of the Federal Committee, called a staff member of RAD to discuss the RFAI dated April 9, 1985. Mr. Whitfield stated that he was not aware of the prohibition against the transfer of funds from a

^{1/} The Federal Committee's 1984 March Monthly Report (2-1-84 through 2-29-84) disclosed \$1,520.08 in cash-on-hand at the end of the reporting period.

non-federal account into a federal account, and that he would immediately refund \$2,250 to the non-federal account and send a copy of the refund check. In addition, Mr. Whitfield noted that the Committee's response to an RFAI that was sent concerning an omitted Schedule A on the 30 Day Post-General Report would indicate that the Committee had received another transfer of \$3,700 from the non-federal account. Mr. Whitfield stated that upon receipt of notification from the Commission he would issue a refund of \$3,700 to the non-federal account.

On April 25, 1985, the Committee submitted its response to the RFAI dated April 9, 1985. The response included a copy of a check drawn on the Federal Committee's account and payable to the State Committee. The check was in the amount of \$2,250 and dated April 23, 1985. The 1985 May Monthly Report of the Federal Committee disclosed the above refund to the State Committee.

The Federal Committee's response of April 25, 1985, referenced its receipt of \$3,700 from the State Committee and noted that "[u]pon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify the transfer." On April 26, 1985, the Federal Committee submitted an amended 30 Day Post-General Report which disclosed the receipt of \$3,700 from the State Committee on November 18, 1984.^{2/} An RFAI was sent to the Federal Committee on May 8, 1985, advising that the full amount of the contribution should be

^{2/} The Federal Committee's 1984 Post-General Election Report (10-18-84 through 11-26-84) disclosed \$388.80 in cash-on-hand at the end of the reporting period.

returned to the State Committee. A second notice was sent to the Federal Committee on May 30, 1985, for failure to respond to the original RFAI. On June 5, 1985, the Federal Committee's treasurer telephoned a staff member of RAD and stated the Federal Committee would issue a \$3,700 refund to the State Committee within the next few days. On June 17, 1985, the Federal Committee responded to the RFAI and second notice by providing a copy of a refund check dated June 11, 1985, from the Federal Committee to the State Committee in the amount of \$3,700. The Federal Committee's 1984 July Monthly Report disclosed the refund of \$3,700 to the State Committee on June 11, 1985.

(B) The applicable law

Pursuant to 11 C.F.R § 102.5(a)(1)(i), an organization which finances political activity in connection with both federal and non-federal elections shall deposit into its federal account only funds subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended. In addition, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. Id.

As set forth at 2 U.S.C. § 441b(a) corporations and labor organizations are prohibited from making contributions or expenditures in connection with federal elections, and political committees are prohibited from knowingly accepting or receiving any contribution prohibited under 2 U.S.C. § 441b(a).

(C) Application of the law to the facts

The record in this matter demonstrates that the Federal Committee accepted two contributions totalling \$5,950 from the State Committee during 1984. Although the contributions from the State Committee were refunded by the Federal Committee 14 months and 7 months, respectively, after the Federal Committee's receipt, such contributions were not refunded within a reasonable time, in the view of this office. See 11 C.F.R. § 103.3. It further appears that the monies in the State Committee's account constituted commingled funds in that corporate and labor union contributions are permissible for use in state election campaigns under Florida state law. See 2 U.S.C. § 441b(a). In view of the foregoing it is the recommendation of this office that the Commission find reason to believe the Federal Committee and Beverly Thompson, as treasurer, violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i) by accepting transfers from the State Committee.

2(6)



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Seaboard System Railroad
Political Action Committee-State
500 Water Street
Jacksonville, Florida 32202

RE: MUR
Seaboard System Railroad
Political Action Committee-State

Dear Sir or Madam:

On , 1985 the Federal Election Commission determined that there is reason to believe the Seaboard System Railroad Political Action Committee-State violated 2 U.S.C. § 441b(a), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), and 11 C.F.R. § 102.5(a)(1)(i). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the committee. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Please submit any such materials within fifteen days of your receipt of this letter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent will not be entertained.

2(7)

Letter to Seaboard System Railroad
Political Action Committee-State
Page 2

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of General Counsel is not authorized to give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

The investigation now being conducted will be confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Maura White, the staff member assigned to this matter, at (202) 523-4143.

Sincerely,

John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

2(8)

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR NO. _____

RESPONDENT: Seaboard System Railroad Political Action
Committee - State

SUMMARY OF ALLEGATIONS

The Seaboard System Railroad Political Action Committee - State ("State Committee") contributed \$5,950 during 1984 to the Seaboard System Railroad Political Action Committee - Federal ("Federal Committee") in violation of 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i).

FACTUAL BASIS AND LEGAL ANALYSIS

(A) The Facts

The 1984 March Monthly Report filed by the Federal Committee disclosed the receipt of \$2,250 on February 3, 1984, from the Committee.^{1/} The State Committee is the non-federal account of Seaboard System Railroad. A Request for Additional Information ("RFAI") was sent by RAD to the Federal Committee on April 9, 1985, advising that the transfer of funds into a federal account from a non-federal account is prohibited by 11 C.F.R. § 102.5(a)(1)(i). The RFAI recommended the refund of the full amount of the contribution to the non-federal account.

On April 22, 1985, W. Edward Whitfield, secretary of the Federal Committee, called a staff member of RAD to discuss the RFAI dated April 9, 1985. Mr. Whitfield stated that he was not aware of the prohibition against the transfer of funds from a

^{1/} The Federal Committee's 1984 March Monthly Report (2-1-84 through 2-29-84) disclosed \$1,520.08 in cash-on-hand at the end of the reporting period.

non-federal account into a federal account, and that he would immediately refund \$2,250 to the non-federal account and send a copy of the refund check. In addition, Mr. Whitfield noted that the Committee's response to an RFAI that was sent concerning an omitted Schedule A on the 30 Day Post-General Report would indicate that the Committee had received another transfer of \$3,700 from the non-federal account. Mr. Whitfield stated that upon receipt of notification from the Commission he would issue a refund of \$3,700 to the non-federal account.

On April 25, 1985, the Committee submitted its response to the RFAI dated April 9, 1985. The response included a copy of a check drawn on the Federal Committee's account and payable to the State Committee. The check was in the amount of \$2,250 and dated April 23, 1985. The 1985 May Monthly Report of the Federal Committee disclosed the above refund to the State Committee.

The Federal Committee's response of April 25, 1985, referenced its receipt of \$3,700 from the State Committee and noted that "[u]pon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify the transfer." On April 26, 1985, the Federal Committee submitted an amended 30 Day Post-General Report which disclosed the receipt of \$3,700 from the State Committee on November 18, 1984.^{2/} An RFAI was sent to the Federal Committee on May 8, 1985, advising that the full amount of the contribution should be

^{2/} The Federal Committee's 1984 Post-General Election Report (10-18-84 through 11-26-84) disclosed \$388.80 in cash-on-hand at the end of the reporting period.

86040595371
returned to the State Committee. A second notice was sent to the Federal Committee on May 30, 1985, for failure to respond to the original RFAI. On June 5, 1985, the Federal Committee's treasurer telephoned a staff member of RAD and stated the Federal Committee would issue a \$3,700 refund to the State Committee within the next few days. On June 17, 1985, the Federal Committee responded to the RFAI and second notice by providing a copy of a refund check dated June 11, 1985, from the Federal Committee to the State Committee in the amount of \$3,700. The Federal Committee's 1984 July Monthly Report disclosed the refund of \$3,700 to the State Committee on June 11, 1985.

(B) The applicable law

Pursuant to 11 C.F.R § 102.5(a)(1)(i), an organization which finances political activity in connection with both federal and non-federal elections shall deposit into its federal account only funds subject to the prohibitions and limitations of the Federal Election Campaign Act of 1971, as amended. In addition, no transfers may be made to such federal account from any other account maintained by such organization for the purpose of financing activity in connection with non-federal elections. Id.

As set forth at 2 U.S.C. § 441b(a) corporations and labor organizations are prohibited from making contributions or expenditures in connection with federal elections, and political committees are prohibited from knowingly accepting or receiving any contribution prohibited under 2 U.S.C. § 441b(a).

(C) Application of the law to the facts

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The record in this matter demonstrates that the Federal Committee accepted two contributions totalling \$5,950 from the State Committee during 1984. Although the contributions from the State Committee were refunded by the Federal Committee 14 months and 7 months, respectively, after the Federal Committee's receipt, such contributions were not refunded within a reasonable time, in the view of this office. See 11 C.F.R. § 103.3. It further appears that the monies in the State Committee's account constituted commingled funds in that corporate and labor union contributions are permissible for use in state election campaigns under Florida state law. See 2 U.S.C. § 441b(a). In view of the foregoing it is the recommendation of this office that the Commission find reason to believe the State Committee violated 2 U.S.C. § 441b(a) and 11 C.F.R. § 102.5(a)(1)(i) by making transfers to the Federal Committee.

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 17 July 1985

ANALYST: Lisa J. Stolaruk

I. COMMITTEE: Seaboard System Railroad Political
Action Committee-Federal (C00007831)
Beverly Thompson, Treasurer
(February 1, 1985-present)
Aileen P. Woodward, Treasurer
(January 1, 1983-February 1, 1985)
500 Water Street
Jacksonville, FL 32202

II. RELEVANT STATUTE: 11 CFR 102.5(a)(1)(i)

III. BACKGROUND:

Receipt of Funds from Non-Federal Account

The 1984 March Monthly Report filed by the Seaboard System Railroad Political Action Committee-Federal ("the Committee") disclosed a \$2,250 transfer-in on February 3, 1984, from Seaboard System Railroad Political Action Committee-State, an apparent non-Federal account maintained by the Committee (Attachment 2). A Request for Additional Information ("RFAI") was sent on April 9, 1985, advising the Committee that 11 CFR 102.5(a)(1)(i) prohibits a Federal account of a committee from accepting funds from an account maintained by the committee for non-Federal activity. The RFAI further recommended that the full amount of the transfer-in should be refunded to the non-Federal account (Attachment 3).

Mr. W. Edward Whitfield, secretary of the Committee, called the Reports Analysis Division ("RAD") analyst on April 22, 1985, to discuss the RFAI. Mr. Whitfield stated that he was not aware of the prohibition against transferring funds from a non-Federal account to a Federal account, but that he would immediately refund \$2,250 to the non-Federal account and send a copy of the check. In addition, Mr. Whitfield noted that the Committee's response to an RFAI that was sent concerning an omitted Schedule A on the 30 Day Post-General Report would indicate that the

SEABOARD SYSTEM RAILROAD POLITICAL
ACTION COMMITTEE-FEDERAL
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

Committee had received another transfer of \$3,700 from its non-Federal account. Mr. Whitfield stated that, upon notification by the Commission, he would issue a second check in the amount of \$3,700 to the Committee's non-Federal account (Attachment 4).

The Committee submitted a response to the RFAI on April 23, 1985, which included a copy of a check in the amount of \$2,250 as a refund to its non-Federal account (Attachment 5). The check was dated April 23, 1985. The 1985 May Monthly Report filed by the Committee confirmed this refund (Attachment 6).

The April 23rd response also referenced the \$3,700 transfer-in from the Committee's non-Federal account which would be disclosed on its amended 30 Day Post-General Report and stated that "Upon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify the transfer" (Attachment 5). On April 24, 1985, the Committee submitted an amended 30 Day Post-General Report which disclosed the receipt of \$3,700 on November 18, 1984, from its non-Federal account (Attachment 7).

An RFAI was sent on May 8, 1985, advising the Committee of the prohibitions of 11 CFR 102.5(a)(1)(i) and that the full amount of the transfer should be returned to the non-Federal account (Attachment 8). A Second Notice was sent to the Committee on May 30, 1985 for failure to respond to the original RFAI (Attachment 9).

On June 5, 1985, Ms. Beverly Thompson, treasurer of the Committee, called the RAD analyst and stated that the Federal account would issue a \$3,700 check to the non-Federal account within the next few days. She further stated that the Committee would forward a copy of the check to the Commission (Attachment 10).

The Committee's response, received June 17, 1985, included a copy of a check dated June 11, 1985 and made payable to its non-Federal account in the amount of \$3,700 (Attachment 11).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) (83-84)

DATE 9JUL85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
SEABOARD SYSTEM RAILROAD POLITICAL ACTION COMMITTEE-FEDERAL CONNECTED ORGANIZATION: CSX CORPORATION				NON-PARTY QUALIFIED	ID #C00007831	
1983	STATEMENT OF ORGANIZATION - AMENDMENT			23MAR83	3	83FEC/268/3764
	FEBRUARY MONTHLY	1,523	500	1JAN83 -31JAN83	4	83FEC/266/4366
	MARCH MONTHLY	202	1,750	1FEB83 -28FEB83	4	83FEC/268/3775
	APRIL MONTHLY	1,620	1,021	1MAR83 -31MAR83	5	83FEC/271/0253
	MAY MONTHLY	13	2,500	1APR83 -30APR83	4	83FEC/271/4832
	JUNE MONTHLY	1,588	1,750	1MAY83 -31MAY83	4	83FEC/274/0873
	JULY MONTHLY	1,099	250	1JUN83 -30JUN83	4	83FEC/277/3096
	AUGUST MONTHLY	1,834	2,500	1JUL83 -31JUL83	4	83FEC/282/0878
	SEPTEMBER MONTHLY	163	250	1AUG83 -31AUG83	4	83FEC/283/05
	OCTOBER MONTHLY	1,882	1,750	1SEP83 -30SEP83	4	83FEC/284/5285
	NOVEMBER MONTHLY	84	250	1OCT83 -31OCT83	4	83FEC/287/1542
	DECEMBER MONTHLY	1,618	1,500	1NOV83 -30NOV83	4	83FEC/288/4877
	YEAR-END	55	0	1DEC83 -31DEC83	3	84FEC/290/4328
1984	STATEMENT OF ORGANIZATION - AMENDMENT			17FEB84	2	84FEC/297/0567
	STATEMENT OF ORGANIZATION - AMENDMENT			22MAR84	1	84FEC/306/0374
	FEBRUARY MONTHLY	785	1,000	1JAN84 -31JAN84	4	84FEC/297/0604
	MARCH MONTHLY	3,084	1,650	1FEB84 -29FEB84	5	84FEC/306/0376
	MARCH MONTHLY - AMENDMENT	-	-	1FEB84 -29FEB84	3	85FEC/372/1531
	REQUEST FOR ADDITIONAL INFORMATION			1FEB84 -29FEB84	3	85FEC/369/5196
	APRIL MONTHLY	951	1,250	1MAR84 -31MAR84	4	84FEC/312/2486
	MAY MONTHLY	770	1,750	1APR84 -30APR84	4	84FEC/315/0097
	JUNE MONTHLY	845	1,000	1MAY84 -31MAY84	4	84FEC/318/0553
	JULY MONTHLY	740	750	1JUN84 -30JUN84	4	84FEC/323/0277
	AUGUST MONTHLY	770	750	1JUL84 -31JUL84	4	84FEC/325/2242
	SEPTEMBER MONTHLY	1,432	0	1AUG84 -31AUG84	3	84FEC/328/4468
	OCTOBER MONTHLY	888	2,350	1SEP84 -30SEP84	4	84FEC/344/0113
	PRE-GENERAL	825	0	1OCT84 -17OCT84	3	84FEC/347/2112
	POST-GENERAL	5,993	6,500	18OCT84 -26NOV84	5	84FEC/356/5118
	POST-GENERAL - AMENDMENT	5,993	6,500	18OCT84 -26NOV84	4	85FEC/372/1512
	POST-GENERAL - AMENDMENT	-	-	18OCT84 -26NOV84	3	85FEC/375/48
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84	1	85FEC/369/51
	REQUEST FOR ADDITIONAL INFORMATION			18OCT84 -26NOV84	3	85FEC/373/0185
	REQUEST FOR ADDITIONAL INFORMATION 2ND			18OCT84 -26NOV84	4	85FEC/374/5286
	YEAR-END	1,049	0	27NOV84 -31DEC84	3	85FEC/360/5198
TOTAL		29,813	0	31,021	0	122 TOTAL PAGES

All of the reports listed above have been reviewed.

Ending cash-on-hand as of 12/31/84: \$1,438

Debts owed by the Committee as of 12/31/84: \$0

8 6 0 4 0 5 9 5 3 7 5
FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (85-86)

DATE 9JUL85
PAGE 1

NON-PARTY RELATED

COMMITTEE	DOCUMENT	RECEIPTS	DISBURSEMENTS	TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
SEABOARD SYSTEM RAILROAD POLITICAL ACTION COMMITTEE-FEDERAL CONNECTED ORGANIZATION: CSX CORPORATION				NON-PARTY QUALIFIED	ID #C00007831	
1985	STATEMENT OF ORGANIZATION - AMENDMENT			20FEB85	1	85FEC/366/5355
	FEBRUARY MONTHLY	871	0	1JAN85 -31JAN85	3	85FEC/366/5356
	MARCH MONTHLY	734	4	1FEB85 -28FEB85	3	85FEC/368/4120
	APRIL MONTHLY	782	4	1MAR85 -31MAR85	3	85FEC/371/4089
	MAY MONTHLY	1,553	2,250	1APR85 -30APR85	4	85FEC/374/0050
	JUNE MONTHLY	1,549	1,500	1MAY85 -31MAY85	4	85FEC/376/1607
	TOTAL	5,489	0 3,758	0	18	TOTAL PAGES

None of these reports has received review.

Ending cash-on-hand as of 5/31/85: \$3,171.11

Debts owed by the Committee as of 5/31/85: \$0

ATTACHMENT 1
(page 2 of 2)

1984 March Monthly Report

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1
 Line Number 1
 Also required attachment for each
 category of the Budget
 Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

Seaboard System Railroad Political Action Committee-Federal

A. Full Name, Mailing Address and ZIP Code

**Seaboard System Railroad Political
 Action Committee-State
 500 Water Street
 Jacksonville, FL 32202**

Receipt For ☒ Primary ☐ General

(1) Other (specify)

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

2/3/84

\$2,250.00

Aggregate Year-to-Date-\$ 2,250.00

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

(1) Other (specify)

Aggregate Year-to-Date-\$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

(1) Other (specify)

Aggregate Year-to-Date-\$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

(1) Other (specify)

Aggregate Year-to-Date-\$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

(1) Other (specify)

Aggregate Year-to-Date-\$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

(1) Other (specify)

Aggregate Year-to-Date-\$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month,
day, year)Amount of Each
Receipt This Period

Occupation

Receipt For ☐ Primary ☐ General

(1) Other (specify)

Aggregate Year-to-Date-\$

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (list page this line number only)

\$2,250.00

RO-2

APR 9 1985

Reference: March Monthly Report (2/1/84-2/29/84)

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses a receipt of \$2,250 from the Seaboard System Railroad Political Action Committee-State Committee (pertinent portion attached). Please clarify whether this transfer is from an account maintained by your committee for non-Federal activity. If so, be advised that such transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-Federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on a supporting Schedule B for Line 27 of your next report.

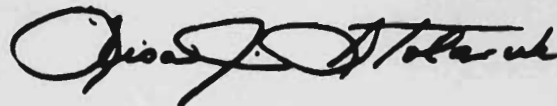
If, however, this transaction represents an "internal transfer" of funds from one Federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-Federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission

within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Lisa J. Stolaruk
Senior Reports Analyst
Reports Analysis Division

85033493197

ANALYST: Lisa Stolaruk

CONVERSATION WITH: Ed Whitfield

COMMITTEE: Seaboard System Railroad Political Action Cmte. - Federal

DATE: 4/22/85

SUBJECT(S): Receipts from non-Federal account

Mr. Whitfield called in response to an RFAI sent regarding a \$2,250 receipt from Seaboard System's non-Federal account. Mr. Whitfield apologized for the error and stated that he was not aware of the prohibition of transferring funds from a non-Federal account to the Federal account. He further stated that he would immediately issue a refund check to the non-Federal account and send a copy of the check.

I had also sent an RFAI on the committee's 30 Day Post-General Report for failure to provide a supporting schedule for a \$3,700 transfer-in. Mr. Whitfield noted that the \$3,700 also came from their non-Federal account. He stated that upon receipt of further notification by the Commission, he would issue a refund check in the amount of \$3,700.

85040595390

05 APR 25 1985 12:28



W E WHITFIELD
Counsel to President
Government Affairs

April 23, 1985

Ms. Lisa J. Stolaruk
Senior Reports Analyst
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

Re: Identification Number: C00007831
March Monthly Report (2/1/84-2/29/84)

Dear Ms. Stolaruk:

Pursuant to our phone conversation, I am by this letter responding to your correspondence of April 9, 1985, to B. P. Thompson, Treasurer of the Seaboard-PAC. In your letter you advised that we violated 11 CFR 102.5 (a) (1) (i) by transferring \$2,250 from our State PAC to our Federal PAC.

To correct this situation, we have issued Seaboard PAC-Federal Check #192 payable to Seaboard PAC-State in the amount of \$2,250. A copy of that check is enclosed for your records.

If you will recall, I also mentioned that upon your receipt of Schedule A for our 30 Day Post-General Report (10/18/84-11/26/86) you would discover a transfer of \$3,700 from State PAC to our Federal PAC.

Upon receipt of your notification of this prohibited transfer, we will take appropriate action to rectify the transfer.

Thank you for bringing this matter to our attention and you may be assured we will not make this mistake again.

Sincerely,

W. Edward Whitfield
Secretary, Seaboard-PAC

Enclosure

WEL:la

SEABOARD SYSTEM RAILROAD
POLITICAL ACTION COMMITTEE - FEDERAL

500 WATER ST
JACKSONVILLE, FL 32202

April 23 1985

92
6:70
630

PAY TO THE ORDER OF Seaboard System Railroad Political Action Committee-State

\$ 2,250.00

Two-Thousand Two-Hundred-Fifty and 00/100

DOLLARS



FLAGSHIP BANK
OF JACKSONVILLE
MAIN OFFICE
JACKSONVILLE, FLORIDA

INTEREST CHECKING

FOR

B. S. Thompson

⑆000192⑆ ⑆0E3000704⑆ 608 393315E⑆

ATTACHMENT 5
(page 3 of 3)



SEABOARD SYSTEM RAILROAD

EXECUTIVE DEPARTMENT

500 Water Street • Jacksonville, Florida 32202



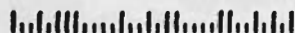
CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Ms. Lisa J. Stolaruk
Senior Reports Analyst
Federal Election Commission
1325 K Street, N.W.
Washington, DC 20463

CERTIFIED

514 602 768

MAIL



65 APR 25 P2:28

• 1985 May Monthly Report
SCHEDULE B

ITEMIZED DISBURSEMENTS

ATTACHMENT 6

Continuation of the Statement of Financial Interests
Form 278e

Any information obtained from such Reports and Statements may not be used or used by any person for the purpose of soliciting contributions for commercial purposes, either directly or indirectly, or for the purpose of conducting any other business or enterprise.

Name of Committee (in Full)

Seaboard System Railroad Political Action Committee-Federal

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
Seaboard System Railroad Political Action Committee-State 500 Water Street Jacksonville, FL 32202	To reimburse SBO-PAC-State account	4/23/85	\$2,250.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (first page this line number only)

\$2,250.00

33033740052



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

ATTACHMENT 7
(page 1 of 4)

FEC

85 APR 26 11:37

NO-2

APR 9 1985

B.P. Thompson, Treasurer
Seaboard System Railroad Political
Action Committee-Federal
500 Water Street
Jacksonville, FL 32202

Identification Number: C00007831

Reference: 30 Day Post-General Report (10/18/84-11/26/84)

Dear Mr. Thompson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Please provide a Schedule A to support the entry on Line 12 of the Detailed Summary Page. All transfers from affiliates received by your committee must be itemized on Schedule A, regardless of the amount. 2 U.S.C. §434(b)(3)(D).

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,

Lisa J. Stolaruk
Senior Reports Analyst
Reports Analysis Division

*Ms. Stolaruk,
Schedule A
attached*

4/13/85

21512721512

(Summary Page)

85 A1 26 All

ALHIN AREA

1. Name of Committee (in Full)

Seaboard System Railroad Political
Action Committee-Federal

Address (Number and Street)

500 Water Street

City, State and ZIP Code

Jacksonville, FL 32202

☐ Check here if address is different than previously reported

2. FEC Identification Number

C-00007831

☐ This committee qualified as a multicandidate committee during this Reporting Period on _____

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☐ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid-year Report (Non Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election of _____ in the State of _____

☒ Thirtieth day report following the General Election

on 11/6/84 in the State of Florida

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☒ NO

SUMMARY

3. Covering Period 10/18/84 through 11/26/84

(a) Cash on hand January 1, 19 84

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add Lines 5(b) and 5(c) for Column A and

Lines 5(a) and 5(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 5(d))

9. Debts and Obligations Owed TO The Committee

(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee

(Itemize all on Schedule C or Schedule D)

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

A. P. Woodward

Type or Print Name of Treasurer

A. P. Woodward
SIGNATURE OF TREASURER

12/4/84
Date

For further information, contact:

Federal Election Commission

Toll Free 800 424 9630

Local 202 523 4362

NOTE: Submission of false information is a criminal offense and subjects the person submitting the report to criminal and civil penalties.

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3a

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 by
FILE NUMBER 117
 (Use separate schedules for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee, to solicit contributions from such committee.

Name of Committee (in Full)
Seaboard System Railroad Political Action Committee-Federal

A. Full Name, Mailing Address and ZIP Code Seaboard System Railroad Political Action Committee-State 500 Water Street, Jax, FL 32202 Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date - \$ 5,950.00	Date (month, day, year) 11/18/84	Amount of Each Receipt This Period \$3,700.00
B. Full Name, Mailing Address and ZIP Code Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
C. Full Name, Mailing Address and ZIP Code Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
D. Full Name, Mailing Address and ZIP Code Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
E. Full Name, Mailing Address and ZIP Code Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
F. Full Name, Mailing Address and ZIP Code Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
G. Full Name, Mailing Address and ZIP Code Receipt For <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date - \$	Date (month, day, year)	Amount of Each Receipt This Period
SUBTOTAL of Receipts This Page - \$			
TOTAL This Period (fig. 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, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 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ATTACHMENT 7
(page 4 of 4)

SEABOARD SYSTEM RAILROAD
RISK MANAGEMENT DEPARTMENT
600 WATER STREET • JACKSONVILLE, FLORIDA 32202



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

CERTIFIED

514 602 788

MAIL

85 APR 26 AM 11:37



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

RG-2

B.P. Thompson, Treasurer
Seaboard System Railroad Political
Action Committee-Federal
500 Water Street
Jacksonville, FL 32202

MA 8 1985

Identification Number: C00007831

Reference: 30 Day Post-General Amended Report (10/18/84-
11/26/84)

Dear Mr. Thompson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report discloses a receipt of \$3,700 from the Seaboard System Railroad Political Action Committee-State (pertinent portion attached). Please clarify whether this transfer is from an account maintained by your committee for non-Federal activity. If so, be advised that such transfer is prohibited by 11 CFR 102.5(a)(1)(i) and the full amount of the transfer should be returned to the non-Federal account. Please inform the Commission immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the transfer-out should be disclosed on a supporting Schedule B for Line 27 of your next report.

If, however, this transaction represents an "internal transfer" of funds from one Federal account to another, and the source(s) of such funds has been identified in previous reports of receipts and disbursements, please note that such transfers should not be itemized as doing so inflates total receipts and cash on hand. If this is the case, please amend your report accordingly.

Although the Commission may take further legal action regarding the acceptance of funds from a non-Federal account, your prompt transfer-out of the funds in question, or clarification of the transaction, will be taken into consideration.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need

assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 523-4048.

Sincerely,



Lisa J. Stolaruk
Senior Reports Analyst
Reports Analysis Division

8 5 7 3 3 7 3 0 1 9 6



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20461

RQ-3

May 30, 1985

B. P. Thompson, Treasurer
Seaboard System Railroad Political
Action Committee - Federal
500 Water Street
Jacksonville, FL 32202

Identification Number: C00007831

Reference: 30 Day Post-General Amended Report (10/18/84-
11/26/84)

Dear Mr. Thompson:

This letter is to inform you that as of May 29, 1985, the Commission has not received your response to our request for additional information, dated May 8, 1985. That notice requested information essential to full public disclosure of your Federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Lisa Stolaruk on our toll-free number (800) 424-9530 or our local number (202) 523-4048.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Gibson".
John D. Gibson
Assistant Staff Director
Reports Analysis Division

Enclosure

ANALYST: Lisa Stolaruk

CONVERSATION WITH: Beverly Thompson, Treasurer (904)359-3473

COMMITTEE: Seaboard System Railroad Political Action Cmte. - Federal

DATE: June 5, 1985

SUBJECT(S): Receipt from non-Federal account

Ms. Thompson called this morning to advise me that the Federal account was going to issue a check to their non-Federal account in the amount of \$3,700 within the next few days. She further stated that the committee would send us a copy of the check.

86040593392

14 FEB

05 JUN 1985 49:38



SEABOARD SYSTEM RAILROAD

500 Water Street • Jacksonville, Florida 32202

W. E. WHITFIELD
Counsel to President
Government Affairs

June 11, 1985

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
1325 "K" Street, N.W.
Washington, DC 20463

Re: Identification Number: C00007831
30 Day Post-General Amended Report
(10/18/84 - 11/26/84)

Dear Mr. Gibson:

In your letters of May 8 and May 30, 1985, you advised that we violated 11 CFR 102.5(a)(1)(i) by transferring \$3,700 from our State PAC to our Federal PAC.

To correct this situation, we have issued Seaboard PAC - Federal Check #198, payable to Seaboard PAC - State, in the amount of \$3,700. A copy of that check is enclosed for your records.

Thank you for bringing this matter to our attention and you may be assured we will not make this mistake again.

Sincerely,

W. Edward Whitfield
Secretary, Seaboard PAC

Enclosure

9 1 1 3 3 5 1 9 1 8

SEABOARD SYSTEM RAILROAD,
POLITICAL ACTION COMMITTEE - FEDERAL
511 WATER ST.
JACKSONVILLE, FLORIDA 32202

ATTACHMENT 11
(page 2 of 2)

198

June 11 1985

6:17
030

PAY TO THE
ORDER OF

Seaboard System Railroad Political Action Committee-State

\$ 3,700.00

Three Thousand Seven Hundred and 00/100 -----

DOLLARS



FLAGSHIP BANK
OF JACKSONVILLE
MAIN OFFICE
JACKSONVILLE, FLORIDA

FOR

B. B. Thompson

⑆000156⑆ ⑆063000704⑆ 606 3933156⑆



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 2077

Date Filmed 7/10/86 Camera No. --- 2

Cameraman AS

86040595305



FEDERAL ELECTION COMMISSION

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

MICROFILM ROLL #

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86040595396

