

OF COUNSEL
JOSEPH R. YOUNG
O.L.B. RIVERS, JR.

LAW OFFICES
YOUNG, CLEMENT, RIVERS & TISDALE

28 BROAD STREET
P.O. Box 993
CHARLESTON, SOUTH CAROLINA 29402
(803) 577-4000
TELEX: 805-675

87 JUN 1 P12:12

ROBERT L. CLEMENT, JR.
(S.C., N.C.)
THOMAS S. TISDALE, JR.
WILLIAM J. BATES
J. RUTLEDGE YOUNG, JR.
WALLACE O. HOLLAND
BRADISH J. WARING
W. JEFFERSON LEATH, JR.
(S.C., D.C. & MD.)
JOHN C. VON LEHE, JR.*
TIMOTHY W. BOUCH
WILLIAM BOBO, JR.
H. MICHAEL BOWERS
CAROL B. ERVIN
JOSEPH E. DAPORE
(S.C. & OHIO)
R. WALTER HUNDLEY
MICHAEL A. MOLONY
RANDELL C. STONEY, JR.
C. MICHAEL BRANHAM
STEPHEN P. GROVES
JUDITH L. FINUF

*CERTIFIED SPECIALIST IN
TAXATION, ESTATE PLANNING
AND PROBATE LAW

May 28, 1987

PERSONAL AND CONFIDENTIAL

Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 2352
John C. von Lehe

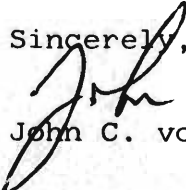
Dear Mr. Levin:

Enclosed please find a copy of the check dated July 24, 1986 by which the Committee repaid \$6,000 to Dr. Edwards. As stated in the letter of September 25, 1986, our first contact with the Federal Election Commission occurred on that date. At that time we repaid the balance outstanding.

Also enclosed please find some proposed language for your consideration. Thank you very much for your help in this matter.

With kind regards.

Sincerely,


John C. von Lehe, Jr.

JCVL, Jr.:db
Enclosure

87 JUN 1 P3:24

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

1986 STEVE JONES
FOR CONGRESS COMMITTEE
P.O. BOX 32242
CHARLESTON, SC 29417

29-JUL-1986 31702983

277

7/24 1986 ~~87-44~~

PAY TO THE
ORDER OF

James B Edwards

6000.00

Six thousand and no/100

DOLLARS

NCNB

NCNB South Carolina
Charleston, SC 29402

FOR

repayment on loan

Susan P Miller

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⑆053200446⑆00

2901 4620⑆

⑆0000600000⑆

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47-22 PEG BOMB 29-JUL-1986 54

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JAMES B. OR ANN D. EDWARDS

0210-2891-5

1986 Steve Jones for Congress Committee
P.O. Box 32242
Charleston, SC 29417

September 25, 1986

Office of the Clerk
US House of Representatives
Washington, DC 20515-6601

Re: 1986 Steve Jones for Congress Committee
ID: 115584

Dear Sirs:

This letter is in response to your notice dated September 2, 1986 concerning the \$10,000 loan made to the committee by James B. Edwards. I apologize for the delay in response, but since our campaign is winding down, our post office box is checked for mail bi-weekly now.

Please be advised that in preparing the Federal Election Commission report for the period ended June 30, 1986 that a loan was reported from Mr. Edwards on Schedule C. It was also reported on Schedule A (with a cross reference to line 13b on the detailed summary page). This was done, according to the instructions for preparing Schedule C, because "when a loan is received by the Committee, it must be itemized on Schedule A".

This is the first campaign that I have been associated with. Our committee has apparently confused South Carolina law with Federal law in thinking that an individual can make a loan rather than getting a bank loan. We regret this misunderstanding, and wish to clearly state that the loan was not made in willful neglect of the federal election commission laws.

A portion of this loan (\$6,000.00) was paid off July 24, 1986. An additional check for \$1,900.00 was paid to Mr. Edwards today. And a loan was taken out by Steve Jones for the balance of \$2,100 today, as soon as we were made aware of the mistake.

I hope this information is sufficient to clarify this problem. Please contact me if you have any further questions.

Yours truly,

Susan P. Miller
Assistant Treasurer

SPM:ls/adm.17

cc: Federal Election Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
1986 Steve Jones for Congress)
Committee)
John C. von Lehe, as treasurer) MUR 2352
James B. Edwards)
John C. von Lehe)

87 JUN 23 P 4: 22

SENSITIVE

GENERAL COUNSEL'S REPORT

On May 14, 1987, the Commission decided to enter into pre-probable cause conciliation with the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, and with James B. Edwards. This Office mailed the notification letters and proposed conciliation agreements to the respondents on May 19, 1987.

The Office of the General Counsel and the respondents have engaged in frequent discussions in an effort to agree on conciliation proposals. At this time, it appears likely that agreements will be reached at this stage of the enforcement process. Therefore, this Office believes it is worthwhile to continue pre-probable cause conciliation negotiations for an additional fifteen (15) days.

Lawrence M. Noble
Acting General Counsel

6/22/87
Date

By: Lois G. Lerner
Lois G. Lerner
Associate General Counsel

23040670510

CCC # 4116
RECEIVED AT THE FEC

OF COUNSEL
JOSEPH R. YOUNG
O.L.B. RIVERS, JR.

LAW OFFICES
YOUNG, CLEMENT, RIVERS & TISDALE

28 BROAD STREET
P.O. Box 993
CHARLESTON, SOUTH CAROLINA 29402
(803) 577-4000
TELEX: 805-675

87 AUG 6 4:50

ROBERT L. CLEMENT, JR.
(S.C., N.C.)
THOMAS S. TISDALE, JR.
WILLIAM J. BATES
J. RUTLEDGE YOUNG, JR.
WALLACE G. HOLLAND
BRADISH J. WARING
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JOHN C. VON LEHE, JR.*
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R. WALTER MUNDLEY
MICHAEL A. MOLONY
RANDELL C. STONEY, JR.
C. MICHAEL BRANHAM
STEPHEN F. GROVES
JUDITH L. FINUF
*CERTIFIED SPECIALIST IN
TAXATION LAW, ESTATE PLANNING
AND PROBATE LAW

August 3, 1987

PERSONAL AND CONFIDENTIAL

Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Your file MUR 2352
1986 Steve Jones for Congress Committee
John C. von Lehe, As Treasurer

Dear Jon:

Enclosed please find my check in the amount of \$1250.00, in accordance with our recent Conciliation Agreement. If you need any more from me, please don't hesitate to let me know.

With kind regards.

Sincerely,


John C. von Lehe, Jr.

JCVL, Jr.:db
Enclosure

RECEIVED
OFFICE OF THE
GENERAL COUNSEL
87 AUG 7 PM 2:28

83040670511

JOHN C. VON LEHE
P.O. BOX 993 577-4000
CHARLESTON, SC 29402

220
Aug 3 19 87
67-1
532

Pay to the
Order of

Federal Election Commission \$ 1250⁰⁰

One thousand two hundred fifty and ^{no}/₁₀₀ Dollars



South Carolina National Bank
Charleston, S.C.

For

Steve Jones 'Congress'

John C. von Lehe

⑆053200019⑆02285⑈10 2557378⑈

CCC#4116

MEMORANDUM

TO: DEBRA A. TRIMIEW

TO: CECILIA LIEBER

FROM: CECILIA LIEBER

FROM: DEBRA A. TRIMIEW

CHECK NO. 220 { A COPY OF WHICH IS ATTACHED } RELATING TO

MUR 2352 (Levin) AND NAME John C. von Lehe, as treasurer

WAS RECEIVED ON 8/7/87. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

/ ☒ / BUDGET CLEARING ACCOUNT { 95F3875.16 }
/ / CIVIL PENALTIES ACCOUNT { 95-1099.160 }
/ / OTHER _____

SIGNATURE Debra A. Trimiew DATE 8/10/87

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
1986 Steve Jones for Congress Committee)	
John C. von Lehe, as treasurer)	MUR 2352
)	
James B. Edwards)	
)	
John C. von Lehe)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On May 14, 1987, the Commission decided to enter into pre-probable cause conciliation with the 1986 Steve Jones for Congress Committee ("the Committee") and John C. von Lehe, as treasurer, and with James B. Edwards. This Office mailed the conciliation agreements to the respondents on May 19, 1987.

33040670513

88040670514

II. ANALYSIS

This Office believes that the changes proposed by the respondents are acceptable.

The addition to the agreement with the Committee of the factual circumstances surrounding the return of the loan reflects the circumstances of this matter confirmed by correspondence of the treasurer during conciliation. The General Counsel's Report recommending entry into pre-probable cause conciliation noted

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that, although the Committee's reports disclosed a return of \$6,000 on July 24, 1986, an affidavit sent by the Committee's assistant treasurer after the reason to believe notification stated that the Committee repaid most of the loan upon receiving information from the Commission that the loan was improper. (The Committee received notifications pertaining to this loan in September, 1986.) The treasurer clarified this discrepancy by enclosing a copy of the front and back of a \$6,000 repayment check from the Committee made out to Dr. Edwards on July 24, 1986.

Based on the foregoing analysis, this Office recommends that the Commission accept the conciliation agreements signed by the Committee treasurer and by Dr. Edwards.*

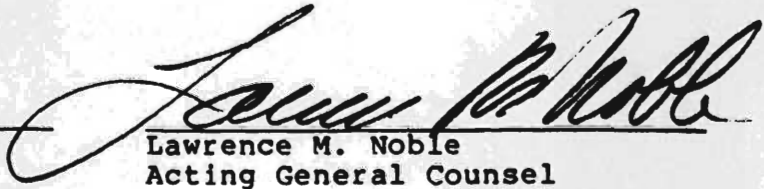
*/ The file in this matter must still remain open, however, even if the Commission accepts these agreements. The Commission has also found reason to believe that John C. von Lehe as an individual violated 2 U.S.C. § 441a(a)(1)(A) in connection with an apparently excessive endorsement of a loan and reason to

III. RECOMMENDATIONS

1. Accept the attached conciliation agreement at Attachment 2 with James B. Edwards.
2. Accept the attached conciliation agreement with the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer.
3. Approve the attached letters.

Date

8/21/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Letter, conciliation agreement, and check from Dr. Edwards, received on June 24, 1987
2. Letter and conciliation agreement from Dr. Edwards, received on July 13, 1987
3. Letter and conciliation agreement from the Committee treasurer, received on July 15, 1987
4. Check from the Committee treasurer, received on August 7, 1987
5. Proposed letters to respondents

(Footnote continued)

believe that the Committee violated 2 U.S.C. § 441a(f) in connection with the acceptance of that loan. In response to the reason to believe notification, Mr. von Lehe has presented evidence indicating that 2 U.S.C. § 441a was not violated. Therefore, this Office still must send no probable cause briefs with respect to that issue.

88040570516

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

1986 Steve Jones for Congress Committee)
John C. von Lehe, as treasurer)

James B. Edwards)

John C. von Lehe)

MUR 2352

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 26, 1987, the Commission decided by a vote of 4-0 to take the following actions in MUR 2352:

1. Accept the conciliation agreement, as recommended in the General Counsel's report signed August 21, 1987.
2. Accept the conciliation agreement with the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, as recommended in the General Counsel's report signed August 21, 1987.
3. Approve the letters, as recommended in the General Counsel's report signed August 21, 1987.

Commissioners Aikens, Elliott, McDonald, and McGarry voted affirmatively for the decision; Commissioners Josefiak and Thomas did not cast a vote.

Attest:

8-27-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Fri., 8-21-87, 3:31
Circulated on 48 hour tally basis: Mon., 8-24-87, 11:00
Deadline for vote: Wed., 8-26-87, 11:00

jw



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 27, 1987

John C. von Lehe, Esquire
Young, Clement, Rivers & Tisdale
28 Broad Street
P.O. Box 993
Charleston, SC 29402

RE: MUR 2352
1986 Steve Jones for
Congress Committee
John C. von Lehe, as
treasurer

Dear Mr. von Lehe:

On August 26, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by you in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the file in this matter will remain open until all of the allegations have been resolved and that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any

Letter to John C. von Lehe, Esquire
Page 2

questions, please contact Jonathan Levin, the attorney assigned
to this matter at (202) 376-5690.

Sincerely,

Lawrence M. Noble (7/1)
Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

88040570519

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
1986 Steve Jones for Congress) MUR 2352
Committee)
John C. von Lehe, as treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, ("Respondents") violated 2 U.S.C. § 441a(f).

NOW, THEREFORE, the Commission and the Respondents, having participated in informal methods of conciliation prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. § 437g(a)(4)(A)(i).

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. The pertinent facts in this matter are as follows:

1. Respondent 1986 Steve Jones for Congress Committee was the principal campaign committee of Steve Jones for election to the House of Representatives in the 1986 Republican primary election in the First Congressional District of South Carolina.

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2. Respondent John C. von Lehe is the treasurer of the 1986 Steve Jones for Congress Committee.

3. Respondents accepted a \$500 contribution from James B. Edwards on October 9, 1985, and a \$500 contribution from James B. Edwards on April 9, 1986.

4. Respondents accepted a \$10,000 loan from James B. Edwards on May 23, 1986.

5. Respondents repaid \$6,000 of the \$10,000 loan on July 24, 1986, before Respondents were notified by the Reports Analysis Division of the Commission that the loan appeared to exceed the statutory limits.

6. Section 441a(a)(1)(A) of Title 2 states that no person shall make contributions to any candidate and his authorized political committees with respect to any election for federal office which, in the aggregate, exceed \$1,000. Section 441a(f) of Title 2 prohibits a political committee from knowingly accepting a contribution made in violation of section 441a.

7. Section 431(8)(A)(i) of Title 2 states that the term "contribution" includes a loan.

V. Respondents accepted contributions from an individual in excess of the limits of 2 U.S.C. § 441a(a)(1)(A) in violation of 2 U.S.C. § 441a(f). Respondents contend that this violation was not knowing and willful.

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Two Hundred and Fifty Dollars (\$1,250), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. 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.

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

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

X. This Conciliation Agreement constitutes the entire agreement between the Commission and the Respondents on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by any party or by agents

89040570522

of any party, that is not contained in this written agreement,
shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble (FD) 8/27/87
Lawrence M. Noble Date
Acting General Counsel

FOR THE RESPONDENTS:

John C. van Liff. July 14, 1987
Date

93040670523



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 27, 1987

Dr. James B. Edwards
100 Venning Street
Mt. Pleasant, SC 29464

RE: MUR 2352
James B. Edwards

Dear Dr. Edwards:

On August 26, 1987, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted by you in settlement of a violation of 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to you. This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. If you have any

Letter to Dr. James B. Edwards
Page 2

questions, please contact Jonathan Levin, the attorney assigned
to this matter at (202) 376-5690.

Sincerely,

Lawrence M. Noble (LZN)

Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

88040670525

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
James B. Edwards

)
) MUR 2352
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("the Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found reason to believe that James B. Edwards ("Respondent") violated 2 U.S.C. S 441a(a)(1)(A).

NOW, THEREFORE, the Commission and the Respondents having participated in informal methods of conciliation prior to a finding of probable cause to believe, do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this agreement has the effect of an agreement entered pursuant to 2 U.S.C. S 437g(a)(4)(A)(i).

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. The pertinent facts in this matter are as follows:

1. Respondent is a person under 2 U.S.C. S 431(11).
2. The 1986 Steve Jones for Congress Committee ("the Committee") was the principal campaign committee of Steve Jones for election to the House of Representatives in the 1986 Republican primary election in the First Congressional District of South Carolina.

3. Respondent made a \$500 contribution to the Committee on October 9, 1985, and a \$500 contribution to the Committee on April 9, 1986.

4. Respondent made a \$10,000 loan to the Committee on May 23, 1986.

5. Section 441a(a)(1)(A) of Title 2 states that no person shall make contributions to any candidate and his authorized political committee with respect to any election for federal office which, in the aggregate, exceed \$1,000. Section 431(8)(A)(i) of Title 2 states that the term "contribution" includes a loan.

V. Respondent contributed \$11,000 to the Committee in violation of 2 U.S.C. S 441a(a)(1)(A).

Respondent contends that this violation was not knowing and willful.

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of One Thousand Two Hundred Fifty Dollars (\$1,250), pursuant to 2 U.S.C. S 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. S 437g(a)(1) concerning the matters at issue herein or on its 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.

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

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

83040670527

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

FOR THE COMMISSION:

Lawrence M. Noble (7/7) 8/27/87
Lawrence M. Noble Date
Acting General Counsel

FOR THE RESPONDENTS:

James B. Edwards July 6, 1987
James B. Edwards Date



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 2, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

ATTENTION: JONATHAN LEVIN

FROM: OSCELYN A. ANDERSON *ma*
COMPLIANCE CLERK
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 2352

Please review the attached Request for Additional Information which is to be sent to 1986 Steve Jones for Congress for the Mid-Year Report. If no response or an inadequate response is received, a Second Notice will be sent.

Any comments which you may have must be forwarded to RAD in writing by 1:00 p.m. on Friday, September 4, 1987.

If comments are not received in writing by the above date and time, the RFAI notice will be sent.

If you have any questions, please contact Oscelyn A. Anderson at 376-2490. Thank you.

COMMENTS:

Attachment

29040670529



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

John C. Von Lehe, Jr., Treasurer
1986 Steve Jones for Congress
13 Sandpiper Court
Isle of Palms, SC 29451

Identification Number: C00198093

Reference: Mid-Year Report (1/1/87-6/30/87)

Dear Mr. Von Lehe:

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:

-Column B figures for the Summary and Detailed Summary Pages should reflect the year-to-date totals for the calendar year 1987 only. You should amend your report accordingly.

-Line 10 of the Summary Page of your report discloses \$0.00 in outstanding obligations. Schedule C of your report discloses \$650.00 in outstanding loans. Please explain the difference and amend your report accordingly. (11 CFR 104.3(d))

-Line 16, Column A, of the Detailed Summary Page does not equal the sum of Lines 11(e), 12, 13(c), 14 and 15. Please amend your report to clarify this apparent discrepancy.

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 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) 376-2480.

Sincerely,

Libby Cooperman

Libby Cooperman
Reports Analyst
Reports Analysis Division

89040670530

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

1986 Steve Jones for Congress
Committee

John C. von Lehe, as treasurer

John C. von Lehe

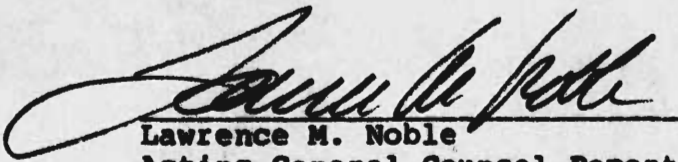
MUR 2352

GENERAL COUNSEL'S REPORT

Based on the assessment of the information presently available, the Office of the General Counsel is prepared to close the investigation in this matter as to John C. von Lehe and the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer.

Date

7/16/87


Lawrence M. Noble
Acting General Counsel Report

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT
6/22/87 PM 3:53
SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 29, 1987

SENSITIVE

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY
87 SEP 29 PM 3:51

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble *LMN (24)*
Acting General Counsel

SUBJECT: MUR 2352

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission findings of no probable cause to believe were mailed on September 29, 1987. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

1. Letter and brief for the 1986 Steve Jones for Congress Committee
2. Letter and brief for John C. von Lehe

38040670532



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 29, 1987

John C. von Lehe, Esquire
Young, Clements, Rivers & Tisdale
28 Broad Street
P. O. Box 993
Charleston, SC 29402

RE: MUR 2352
John C. von Lehe

Dear Mr. von Lehe:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on March 11, 1987, found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), 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 no probable cause to believe that a violation has occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 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 the 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 whether there is 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 for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

Letter to John C. von Lehe
Page 2

Should you have any questions, please contact Jonathan
Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble (LH)

Lawrence M. Noble
Acting General Counsel

Enclosure
Brief

8 8 0 4 0 6 7 0 5 3 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
John C. von Lehe

)
) MUR 2352
)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

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The 1986 October Quarterly Report of the 1986 Steve Jones for Congress Committee ("the Committee") reported that there was a \$2,100 loan to the Committee from the South Carolina National Bank and listed two guarantors. These were the candidate Steve Jones and Committee treasurer John von Lehe, who had already contributed \$250 to the Committee on February 1, 1986, and \$750 to the Committee on February 6, 1986. The loan was reported as being made on September 25, 1986, at an interest rate of "prime + 1½" and with a due date of January 25, 1987.

On November 4, 1986, the Reports Analysis Division sent a Request for Additional Information to the Committee referring to Mr. von Lehe's contributions and apparent loan guarantee. On November 18, 1986, the Committee sent an amended October Quarterly omitting Mr. von Lehe as a guarantor.

Accompanying this amended report was a letter stating the following:

Upon receipt of your letter dated November 4, 1986, and upon further inquiry of both the lending bank and our candidate, we have found Mr. von Lehe was not a guarantor of the note. The note is a personal debt of Steve Jones only.

In the First General Counsel's Report, this Office stated that, despite the Committee's explanation, "this is the kind of

reporting error that is not easily explained by inadvertence."

On March 11, 1987, the Commission found reason to believe that Mr. von Lehe violated 2 U.S.C. § 441a(a)(1)(A). On March 31, 1987, this Office received a response from Mr. von Lehe. This response included a letter from Mr. von Lehe explaining the circumstances of the loan and pertinent documents.

The response of Mr. von Lehe states that he "did not act as an endorser or guarantor or agent or anything else" with regard to the loan. He explains that the Committee's assistant treasurer had received misinformation which she included in the October Quarterly Report. He states that "it was suggested that [he] might guarantee the loan" and that the assistant treasurer believed that he had done so. He maintains, however, that he was never directly asked and never guaranteed the loan in any way. Mr. von Lehe then refers to the aforementioned letter sent by the Committee assistant treasurer on November 18 stating that Mr. von Lehe was not a guarantor and that the loan note was a personal debt of the candidate only.

Enclosed with Mr. von Lehe's letter is an affidavit from an officer of the lending bank stating that the loan note was a personal note from the candidate guaranteed by no one else. Enclosed also is a copy of the note containing only the candidate's signature. It appears from the affidavit and the note that the loan was for \$2,130, rather than \$2,100.

II. LEGAL ANALYSIS

Section 441a(a)(1)(A) of Title 2 prohibits a person from making contributions to any candidate and his authorized committees with respect to a federal election which, in the aggregate, exceed \$1,000. According to 2 U.S.C. § 431(8)(A)(i), a loan is a contribution. According to 2 U.S.C. § 431(8)(B)(vii)(I), a bank loan "shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorser or guarantors." See also 11 C.F.R. § 100.7(b)(11).

From the evidence presented in response to the reason to believe notification, it appears that Mr. von Lehe did not guarantee the loan in question. Therefore, it appears that the total of his contributions to the Committee did not exceed \$1,000. Based on the foregoing analysis, the General Counsel recommends that the Commission find no probable cause to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A).

III. RECOMMENDATION

Find no probable cause to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A).

9/28/87
Date

Lawrence M. Noble (2174)
Lawrence M. Noble
Acting General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 29, 1987

John C. von Lehe, Esquire
Young, Clement, Rivers & Tisdale
28 Broad Street
P. O. Box 993
Charleston, SC 29402

RE: MUR 2352
1986 Steve Jones for Congress
Committee
John C. von Lehe, as treasurer

Dear Mr. von Lehe:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on February 20, 1987, found that there was reason to believe that the 1986 Steve Jones for Congress Committee ("the Committee") and John C. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f), and instituted an investigation of 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 no probable cause to believe that the Committee and you, as treasurer, violated 2 U.S.C. § 441a(f) with respect to contributions by you to the Committee and a \$2,130 loan received by the Committee.

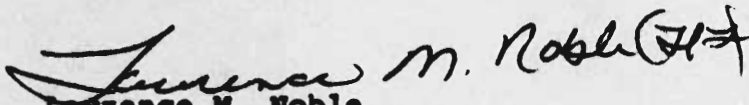
The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. With 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies 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 whether there is 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 for an extension of time. All requests for extension of time must be submitted in writing five days prior to the due date and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

Letter to John C. von Lehe
Page 2

Should you have any questions, please contact Jonathan
Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Brief

99040670539

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
1986 Steve Jones for Congress) MUR 2352
Committee)
John C. von Lehe, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

The 1986 October Quarterly Report of the 1986 Steve Jones for Congress Committee ("the Committee") reported that there was a \$2,100 loan to the Committee from the South Carolina National Bank. The loan was obtained by the Committee in order to repay a \$10,000 loan from Dr. James B. Edwards. The report listed two guarantors, the candidate Steve Jones and Committee treasurer John von Lehe, who had already contributed \$250 to the Committee on February 1, 1986, and \$750 to the Committee on February 6, 1986. The loan was reported as being made on September 25, 1986, at an interest rate of "prime + 1%" and with a due date of January 25, 1987.

On November 4, 1986, the Reports Analysis Division sent a Request for Additional Information to the Committee referring to Mr. von Lehe's contributions and apparent loan guarantee. On November 18, 1986, the Committee sent an amended October Quarterly omitting Mr. von Lehe as a guarantor.

Accompanying this amended report was a letter stating the following:

Upon receipt of your letter dated November 4, 1986 and upon further inquiry of both the lending bank and our candidate, we have found Mr. von Lehe was not a guarantor of the note. The note is a personal debt of Steve Jones only.

93740670540

In the First General Counsel's Report, this Office stated that, despite the Committee's explanation, "this is the kind of reporting error that is not easily explained by inadvertence."

On February 20, 1987, the Commission found reason to believe that the Committee and Mr. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f).¹/ This finding was made with respect to the loan and direct contributions from Dr. Edwards, as well as the alleged loan guarantee and direct contributions of Mr. von Lehe that comprise the subject of this brief.

On March 31, 1987, this Office received a response from Mr. von Lehe. This response included a letter from Mr. von Lehe explaining the circumstances of the loan and pertinent documents.

The response of Mr. von Lehe states that he "did not act as an endorser or guarantor or agent or anything else" with regard to the loan. He explains that the Committee's assistant treasurer had received misinformation which she included in the October Quarterly Report. He states that "it was suggested that [he] might guarantee the loan" and that the assistant treasurer believed that he had done so. He maintains, however, that he was never directly asked and never guaranteed the loan in any way. Mr. von Lehe then refers to the aforementioned letter sent by the Committee assistant treasurer on November 18 stating that Mr.

¹/ The notification letter to the Committee was not mailed until March 19, 1987, pending the amendment of another determination in this matter.

von Lehe was not a guarantor and that the loan note was a personal debt of the candidate only.

Enclosed with Mr. von Lehe's letter is an affidavit from an officer of the lending bank stating that the loan note was a personal note from the candidate guaranteed by no one else. Enclosed also is a copy of the note containing only the candidate's signature. It appears from the affidavit and the note that the loan was for \$2,130, rather than \$2,100.

II. LEGAL ANALYSIS

Section 441a(a)(1)(A) of Title 2 prohibits a person from making contributions to any candidate and his authorized committees with respect to a federal election which, in the aggregate, exceed \$1,000. Section 441a(f) of Title 2 prohibits the knowing acceptance of any contribution exceeding the limitations of 2 U.S.C. § 441a. According to 2 U.S.C. § 431(8)(A)(i), a loan is a contribution. According to 2 U.S.C. § 431(8)(B)(vii)(I), a bank loan "shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors." See also 11 C.F.R. § 100.7(b)(11).

From the evidence presented in response to the reason to believe notification, it appears that Mr. von Lehe did not guarantee the loan in question. Therefore, it appears that the total of his contributions to the Committee did not exceed \$1,000. Based on the foregoing analysis, the General Counsel recommends that the Commission find no probable cause to believe

that the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f) with respect to the contributions of Mr. von Lehe and the \$2,130 loan received by the Committee.

II. RECOMMENDATION

Find no probable cause to believe that the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f) with respect to the contributions of John C. von Lehe and the \$2,130 loan received by the Committee.

23040670543
Date

9/28/87

Lawrence M. Noble (117)
Lawrence M. Noble
Acting General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 7, 1987

MEMORANDUM

TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

ATTENTION: JONATHAN LEVIN

FROM: OSCELYN A. ANDERSON *aa*
COMPLIANCE CLERK
COMPLIANCE BRANCH, REPORTS ANALYSIS DIVISION

SUBJECT: MUR 2352

Please review the attached Informational Notice which is to be sent to the 1986 Steve Jones for Congress Committee for the Termination Report. If no response or an inadequate response is received, the letter will be sent.

Any comments which you may have must be forwarded to RAD in writing by 2:00 p.m. on Friday, October 9, 1987.

If comments are not received in writing by the above date and time, the Informational notice will be sent.

If you have any questions, please contact Oscelyn A. Anderson at 376-2490. Thank you.

COMMENTS:

Attachment

88040370544



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MS-F

OCT 3 1987

**John C. Von Lehe, Treasurer
1986 Steve Jones for Congress Committee
13 Sandpiper Court
Isle of Palms, SC 29451**

Identification Number: C00198093

Reference: Termination Report (7/1/87-8/31/87)

Dear Mr. Von Lehe:

Your committee's filing has been accepted as a valid termination because it meets the conditions set forth in 2 U.S.C. §433(d) and Section 102.3 of the Commission's Regulations. Your committee is no longer required to file reports on a periodic basis. However, 2 U.S.C. §432(d) and Sections 102.9(c) and 104.14(b)(3) of the Commission's Regulations require that you maintain your records and copies of reports for inspection for at least three (3) years. In addition, you may be required to respond to Commission requests for information regarding your committee's federal election activity and previously filed reports.

If your committee again becomes active in federal elections, it will be required to re-register with the Commission in accordance with the Federal Election Campaign Act and applicable Regulations. Your committee will be treated as a new entity by the Commission and should register as a new committee on FEC FORM 1, pursuant to 2 U.S.C. §§432(g) and 433(a).

If you have any questions concerning your status and requirements, please contact the Reports Analysis Division on the toll-free number, (800) 424-9530. Our local number is (202) 376-2480.

Sincerely,

Libby Cooperman

**Libby Cooperman
Reports Analyst
Reports Analysis Division**

BEFORE THE FEDERAL ELECTION COMMISSION

87 OCT 29 PM 5:22

In the Matter of)
1986 Steve Jones for Congress)
Committee)
John C. von Lehe, as treasurer)
James B. Edwards)
John C. von Lehe)

MUR 2352

SENSITIVE
EXECUTIVE SESSION
NOV 10 1987

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter involves allegations as to the receipt of excessive contributions by the 1986 Steve Jones for Congress Committee ("the Committee") from James B. Edwards and John C. von Lehe, the Committee treasurer. The Committee's 1986 July Quarterly Report disclosed a \$10,000 loan from Dr. Edwards on May 23, 1986, for the June 10 primary election. Previous reports of the Committee disclosed \$1,000 in total contributions from Dr. Edwards for the primary, i.e., a \$500 contribution on October 9, 1985, and a \$500 contribution on April 9, 1986. The Committee's 1986 October Quarterly Report indicated that the Committee made repayments on the loan of \$6,000 on July 24, \$1,900 on September 22, and \$2,100 on September 26.

The same report also disclosed a \$2,100 loan to the Committee from the South Carolina National Bank with two guarantors listed, the candidate and Mr. von Lehe who had already contributed \$250 to the Committee on February 1, 1986, and \$750 to the Committee on February 6, 1986. Although an amendment was filed eliminating Mr. von Lehe's name along with a letter stating that Mr. von Lehe was not a guarantor, this Office recommended that the Commission seek a further explanation.

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On February 20, 1987, the Commission found reason to believe that Dr. Edwards violated 2 U.S.C. § 441a(a)(1)(A) and reason to believe that the Committee and Mr. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f).^{1/} On March 11, 1987, the Commission determined that there was reason to believe that Mr. von Lehe violated 2 U.S.C. § 441a(a)(1)(A). On March 31, 1987, this Office received a response from Mr. von Lehe. This response included a letter from Dr. Edwards explaining the circumstances of his loan to the Committee, a letter from Mr. von Lehe explaining the circumstances of the \$2,100 loan, and affidavits and documents pertaining to the loans.

The letter from Dr. Edwards admitted a violation of 2 U.S.C. § 441a(a)(1)(A) and explained the circumstances surrounding his loan to the Committee. The letter from Mr. von Lehe stated that the Committee's assistant treasurer had received misinformation which she included in the October Quarterly Report and that he had never guaranteed the loan in any way. (The accompanying documentation indicated that the loan was for \$2,130, rather than \$2,100.)

On April 7, 1987, this Office received a request for pre-probable cause conciliation from Mr. von Lehe on behalf of the Committee "based upon the facts as outlined in a letter to you of

^{1/} The notification letters to the respondents were not mailed until March 19, 1987, pending the amendment of the determination with respect to John von Lehe as an individual.

March 30 from Dr. James B. Edwards." Along with that letter was a request from Dr. Edwards for pre-probable cause conciliation. On May 14, 1987, the Commission voted to enter pre-probable cause conciliation with Dr. Edwards and with the Committee and Mr. von Lehe, as treasurer, with respect to the \$10,000 loan from Dr. Edwards. On August 26, 1987, the Commission approved conciliation agreements signed by Dr. Edwards and by the Committee.

On September 29, 1987, this Office sent briefs to Mr. von Lehe and to the Committee and Mr. von Lehe, as treasurer, stating that this Office was prepared to make a recommendation that the Commission find no probable cause to believe that Mr. von Lehe violated 2 U.S.C. § 441a(a)(1)(A) and a recommendation that the Commission find no probable cause to believe that the Committee and Mr. von Lehe violated 2 U.S.C. § 441a(f) with respect to the contributions of Mr. von Lehe and the \$2,130 loan received by the Committee. No response to these briefs has been filed.

II. LEGAL ANALYSIS

For a legal analysis of the circumstances of Mr. von Lehe's contributions to the Committee and the \$2,130 loan received by the Committee, this Office refers the Commission to the General Counsel's Briefs, dated September 29, 1987.

III. RECOMMENDATIONS

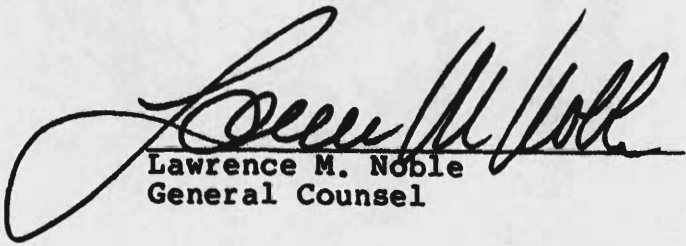
1. Find no probable cause to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A).
2. Find no probable cause to believe that the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f) with respect to the

contributions of Mr. von Lehe and the \$2,130 loan received by the Committee.

3. Close the file.
4. Approve the attached letters.

Date

10/29/87


Lawrence M. Noble
General Counsel

Attachments

1. Proposed letter to Mr. von Lehe
2. Proposed letter to Dr. Edwards

93040670549

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

1986 Steve Jones for Congress Committee)
John C. von Lehe, as treasurer)

James B. Edwards)

John C. von Lehe)

MUR 2352

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of November 10, 1987, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 2352:

1. Find no probable cause to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A).
2. Find no probable cause to believe that the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f) with respect to the contributions of Mr. von Lehe and the \$2,130 loan received by the Committee.
3. Close the file.

(continued)

Federal Election Commission
Certification for MUR 2352
November 10, 1987

Page 2

4. Approve the letters attached to the
General Counsel's report dated
October 29, 1987.

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

Attest:

11-10-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

88740570551



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

13 November 1987

Dr. James B. Edwards
100 Venning Street
Mt. Pleasant, SC 29464

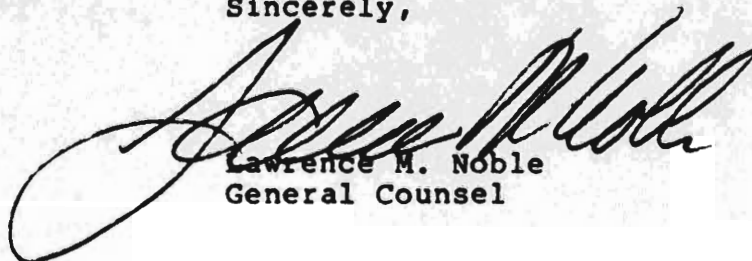
RE: MUR 2352
James B. Edwards

Dear Dr. Edwards:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble
General Counsel

83040570552



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

13 November 1987

John C. von Lehe, Esquire
Young, Clement, Rivers & Tisdale
28 Broad Street
P. O. Box 993
Charleston, SC 29402

RE: MUR 2352
John C. von Lehe

1986 Steve Jones for Congress
Committee
John C. von Lehe, as treasurer

Dear Mr. von Lehe:

This is to advise you that, on November 10, 1987, the Federal Election Commission found that there is no probable cause to believe that you violated 2 U.S.C. § 441a(a)(1)(A). On that date, the Commission also found no probable cause to believe that the 1986 Steve Jones for Congress Committee and you, as treasurer, violated 2 U.S.C. § 441a(f) with respect to contributions made by you and the \$2,130 loan received by the Committee. Accordingly, the file in this matter has been closed.

This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

If you have any questions, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20541

THIS IS THE END OF MUR # 2352

DATE FILMED 1/13/88 CAMERA NO. 3

CAMERAMAN AS

28040570554



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

THIS IS THE BEGINNING OF MUR # 2352

DATE FILMED 4/13/88 CAMERA NO. 3

CAMERAMAN AS

98040670446

PUBLIC RECORD INDEX - MUR 2352

1. Memo, 9 Dec 86, John D. Gibson (Reports Analysis Division) to Charles N. Steele (General Counsel), subj: Referral of the 1986 Steve Jones For Congress Committee, w/atchs (RAD Referral Package).
2. First General Counsel's Report, 17 Feb 87.
3. Certification of Commission Action, 24 Feb 87.
4. Memo, 10 May 87, Majorie W. Emmons/Joshua McFadden to C.N. Steele, subj: Objection to RAD Ref. 86L-28.
5. Memo, 11 Mar 87, Commissioner Josefiak to the Commission Secretary, subj: withdrawal of objection.
6. Memo, 5 Mar 87, C.N. Steele to the Commission, subj: Amendment of Certification in RAD Ref 86L-28.
7. Certification of Commission Action, 12 Mar 87.
8. Notification ltrs, 19 Mar 87, Scott E. Thomas (Chairman, FEC) to: a) Dr. James B. Edwards; b) John C. von Lehe (Treasurer, 1986 Steve Jones for Congress Committee); and c) John C. von Lehe.
9. Ltr, 25 Mar 87, John C. von Lehe, Jr. to Scott E. Thomas, w/atch.
10. Ltr, 30 Mar 87, James B. Edwards to Scott E. Thomas.
11. Ltr, 2 Apr 87, John C. von Lehe, Jr., to Scott E. Thomas, w/atch.
12. Ltr, 7 Apr 87, J.B. Edwards, to S.E. Thomas, subj: Request for pre-probable cause conciliation.
13. General Counsel's Report, 7 May 87.
14. Memo, 13 May 87, M.W. Emmons/Joshua McFadden to Lawrence M. Noble (Acting General Counsel), subj: objection to MUR 2352.
15. Memo, 14 May 87, Danny L. McDonald (Commissioner) to M.W. Emmons, subj: Withdrawal of objection.
16. Certification of Commission Action, 15 May 87.
17. Ltr, 19 May 87, L.M. Noble to Dr. James B. Edwards.
18. Ltr, 19 May 87, L.M. Noble to John C. von Lehe.

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19. Ltr, 28 May 87, John C. von Lehe, Jr. to FEC, w/atch.
20. General Counsel's Report, 22 Jun 87.
21. Ltr, 3 Aug 87, John C. von Lehe, Jr. to FEC, w/atch.
22. General Counsel's Report, 21 Aug 87.
23. Certification of Commission Action, 27 Aug 87.
24. Ltr, 27 Aug 87, L.M. Noble to John C. von Lehe, w/atch
(executed conciliation agreement - Steve Jones for Congress
Cmte and J.C. von Lehe, as Treasurer).
25. Ltr, 27 Aug 87, L.M. Noble to Dr. James B. Edwards, w/atch
(executed conciliation agreement).
26. Memo, 2 Sep 87, Oscelyn A. Anderson to L.M. Noble, w/atch
(Proposed Request for Additional Information, "RFAI").
27. General Counsel's Report, 16 Sep 87.
28. Memo, 29 Sep 87, L.M. Noble to the Commission.
29. Ltr, 29 Sep 87, L.M. Noble to J.C. von Lehe w/atch (G.C.
Brief).
30. Ltr, 29 Sep 87, L.M. Noble to J.C. von Lehe w/atch (G.C.
Brief re: Steve Jones for Cong. Cmte).
31. Memo, 7 Oct 87, Oscelyn A. Anderson to L.M. Noble, w/atch
(Proposed Informational Notice).
32. General Counsel's Report, 29 Oct 87.
33. Certification of Commission Action, 10 Nov 87.
34. Ltr, 13 Nov 87, L.M. Noble to Dr. James B. Edwards.
35. Ltr, 13 Nov 87, L.M. Noble to John C. von Lehe.

-END-

NOTE: In preparing its file for the public record, O.G.C.
routinely removes those documents in which it perceives
little or no public interest, and those documents, or
portions thereof, which are exempt from disclosure under
the Freedom of Information Act.

833040670448

**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

9 December 1986

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: JOHN C. SURINA *Charles N. Steele*
STAFF DIRECTOR

FROM: JOHN D. GIBSON *John D. Gibson*
ASSISTANT STAFF DIRECTOR
REPORTS ANALYSIS DIVISION

SUBJECT: REFERRAL OF THE 1986 STEVE JONES FOR CONGRESS
COMMITTEE

This is a referral of the 1986 Steve Jones for Congress Committee ("the Committee"). The Committee accepted an apparent \$10,000 excessive contribution in the form of a loan from an individual. According to the 1985-1986 Reports Analysis Division Review and Referral Procedures for Authorized Committees (Standard 2), this matter requires further examination by your office.

The candidate, Stephen L. Jones, lost the primary election held on June 10, 1986 in the First (1st) Congressional District of South Carolina, receiving thirty-three percent (33%) of the vote.

If you have any question, please contact Libby Cooperman at 376-2480.

Attachment

98040670449

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 9 December 1986

ANALYST: Libby Cooperman

- I. COMMITTEE: 1986 Steve Jones for Congress Committee
(C00198093)
John C. VonLehe, Treasurer
P.O. Box 32242
Charleston, SC 29417
- II. RELEVANT STATUTE: 2 U.S.C. §441a(f)
- III. BACKGROUND:

Acceptance of Excessive Contribution in the Form of a Loan

The 1986 Steve Jones for Congress Committee ("the Committee") disclosed on its 1986 July Quarterly Report the receipt of a \$10,000 loan from an individual, James B. Edwards.^{1/} Schedule A of the Committee's 1986 July Quarterly Report disclosed a \$10,000 loan from James B. Edwards, received on May 23, 1986, with an aggregate year-to-date total of \$10,000, and designated for the primary election (Attachment 4). Schedule C of the Committee's report disclosed the same \$10,000 loan incurred on May 23, 1986. The loan was designated for the primary election, had a due date of "demand," and an interest rate of "N/A" (Attachment 5). The amount of the apparent excessive contribution received from James B. Edwards totalled \$10,000.

On September 16, 1986, a Request for Additional Information ("RFAI") was mailed to the Committee regarding its 1986 July Quarterly Report. The RFAI informed the Committee of the apparent excessive contribution. The Committee was also advised that if it had received an excessive contribution, that it refund the excessive amount to the contributor and notify the Commission in writing of the refund (Attachment 6).

^{1/} Mr. James B. Edwards had previously contributed \$1,000, designated for the primary election, to the Committee. The 1985 Year End Report itemized a \$500 contribution (Attachment 2) and the 1986 12 Day Pre-Primary Report itemized a \$500 contribution (Attachment 3).

1986 STEVE JONES FOR CONGRESS
COMMITTEE
REPORTS ANALYSIS OGC REFERRAL
PAGE 2

On September 29, 1986, the Committee filed an amendment to its 1986 July Quarterly Report referencing a notice dated September 2, 1986.^{2/} The amendment stated that the Committee had apparently confused South Carolina law with federal law, and wished to clearly state that the loan was not made in willful neglect of federal law. The amendment also stated that \$6,000 of the \$10,000 loan was repaid on July 24, 1986, \$1,900 was repaid on September 25, 1986, and that the balance of \$2,100 was repaid on September 25, 1986 when the Committee became aware of the mistake (Attachment 7).

The Committee's 1986 October Quarterly Report disclosed the \$10,000 in loan repayments in the total disclosed on Line 19(b) of the Detailed Summary Page (Attachment 8). Schedule B, supporting Line 19(b) disclosed loan repayments of \$6,000 on July 24, 1986, \$1,900 on September 22, 1986, and \$2,100 on September 25, 1986 for a total of \$10,000 in loan repayments to James B. Edwards (Attachment 9). Also, Schedule C shows the cumulative payment-to-date of \$10,000 to James B. Edwards with a balance outstanding at close of this period of \$0 (Attachment 10).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

^{2/} On September 2, 1986 a notice was sent to the Committee from the Office of the Clerk, U.S. House of Representatives requesting the same information as the Commission's RFAI.

33040670451

8 3 0 4 0 6 7 0 4 5 2

FEDERAL ELECTION COMMISSION

1985-1986

CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 29OCT86

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
JONES, STEPHEN L	HOUSE 01	REPUBLICAN PARTY					SOUTH CAROLINA 1986 ELECTION	ID# H6SC01094	
1. STATEMENT OF CANDIDATE									
1985 STATEMENT OF CANDIDATE							19SEP85	1	85HSE/291/1336
2. PRINCIPAL CAMPAIGN COMMITTEE									
1986 STEVE JONES FOR CONGRESS COMMITTEE							ID# C00198093 HOUSE		
1985 STATEMENT OF ORGANIZATION							23SEP85	1	85HSE/291/1748
YEAR-END			14,097		6,904		1JUL85 -31DEC85	7	86HSE/295/4353
1986 48 HOUR CONTRIBUTION NOTICE							29MAY86	1	86HSE/304/5086
48 HOUR CONTRIBUTION NOTICE							30MAY86	1	86HSE/305/0123
APRIL QUARTERLY			29,993		30,765		1JAN86 -31MAR86	12	86HSE/302/4298
APRIL QUARTERLY - AMENDMENT			29,993		30,765		1JAN86 -31MAR86	12	86HSE/304/5087
1ST LETTER INFORMATIONAL NOTICE							1JAN86 -31MAR86	1	86FEC/414/1569
PRE-PRIMARY			33,058		35,924		1APR86 -21MAY86	9	86HSE/304/5034
PRE-PRIMARY - AMENDMENT			33,058		35,924		1APR86 -21MAY86	10	86HSE/305/4569
JULY QUARTERLY			24,300		20,418		22MAY86 -30JUN86	10	86HSE/310/3730
JULY QUARTERLY - AMENDMENT							22MAY86 -30JUN86	1	86HSE/314/3751
REQUEST FOR ADDITIONAL INFORMATION							22MAY86 -30JUN86	3	86FEC/430/3785
OCTOBER QUARTERLY			4,438		11,399		1JUL86 -30SEP86	9	86HSE/318/1626
TOTAL			105,914	0	105,410	0		77	TOTAL PAGES
3. AUTHORIZED COMMITTEES									
4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN									

ALL REPORTS HAVE BEEN REVIEWED.

ENDING CASH-ON-HAND AS OF 9/30/86: \$501

OUTSTANDING DEBTS AND OBLIGATIONS AS OF 9/30/86: \$2,100

ATTACHMENT 1

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER 110
(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)

1986 Steve Jones for U.S. House # 115584

A. Full Name, Mailing Address and ZIP Code

Charles W. Allen
7215 Eastern Avenue
Annandale, VA 22005

Name of Employer

U.S. Dept of Health
& Human Services

Date (month,
day, year)

8/28/85

Amount of Each
Receipt This Period

500.00

Occupation

Administrator

Receipt For:

☒ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$ 500.00

B. Full Name, Mailing Address and ZIP Code

Grover F Bowers Jr
Estill SC 29918

Name of Employer

self-employed

Date (month,
day, year)

8/12/85

Amount of Each
Receipt This Period

500.00

Occupation

Farmer

Receipt For:

☒ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$ 300.00

C. Full Name, Mailing Address and ZIP Code

U) Melvin Brown Jr
2311 Portside Way
Charleston SC 29407

Name of Employer

American Development
Corp.

Date (month,
day, year)

10/9/85

Amount of Each
Receipt This Period

400.00

Occupation

President

Receipt For:

☒ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$ 400.00

D. Full Name, Mailing Address and ZIP Code

Cooper W. Cecil
138 Eastwood Circle
Spartanburg SC 29302

Name of Employer

retired

Date (month,
day, year)

12/1/85

Amount of Each
Receipt This Period

100.00

Occupation

Receipt For:

☒ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$ 300.00

E. Full Name, Mailing Address and ZIP Code

William A. Coates
27 University Ridge Circle
Greenville SC 29601

Name of Employer

Love, Thornton
Arnold & Trombly
Attys at Law

Date (month,
day, year)

11/2/85

Amount of Each
Receipt This Period

300.00

Occupation

Attorney

Receipt For:

☒ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$ 300.00

F. Full Name, Mailing Address and ZIP Code

Gaylord Donnelley
2223 Martin Luther King Blvd
Chicago IL 60616

Name of Employer

Donnelley Corp.

Date (month,
day, year)

7/24/85

Amount of Each
Receipt This Period

300.00

Occupation

Executive

Receipt For:

☒ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$ 300.00

G. Full Name, Mailing Address and ZIP Code

James E. Edwards
100 Venning St
Mt Pleasant SC 29464

Name of Employer

Mt Univ of S.C.

Date (month,
day, year)

10/7/85

Amount of Each
Receipt This Period

500.00

Occupation

President of Univ.

Receipt For:

☒ Primary☐ General☐ Other (specify):

Aggregate Year-to-Date-\$ 500.00

SUBTOTAL of Receipts This Page (optional).....

3300.00

TOTAL This Period (last page this line number only).....

0.00 3041.00 575.00 1335.00

LC

SCHEDULE A

ITEMIZED RECEIPTS

(List number 115584)
This schedule should be filed 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 contributors.

Name of Committee (or Full)

1986: Steve Jones for Congress Committee 115584

A. Full Name, Mailing Address and ZIP Code

David W Cecil
Edgecomb Rd
Spartanburg SC 29302

Name of Employer

I.R.

Date (month,
day, year)

4/2/86

Amount of Cash
Receipt This Period

1000.00

Occupation

Aggregate Year-to-Date-\$ 1000.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

B. Full Name, Mailing Address and ZIP Code

James P Fabiani
1702 Hollinwood Dr
Alexandria Va 22307

Name of Employer

I.R.

Date (month,
day, year)

4/4/86

Amount of Cash
Receipt This Period

500.00

Occupation

Aggregate Year-to-Date-\$ 500.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

C. Full Name, Mailing Address and ZIP Code

James B Edwards
100 Venning St
Mt Pleasant SC 29464

Name of Employer

Medical Univ of SC

Date (month,
day, year)

4/9/86

Amount of Cash
Receipt This Period

500.00

Occupation

President

Aggregate Year-to-Date-\$ 1000.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

D. Full Name, Mailing Address and ZIP Code

H.C. Jones Jr
Drawer 40
Sheldon SC 29941

Name of Employer

White Lightning
Aircraft CoDate (month,
day, year)

4/14/86

Amount of Cash
Receipt This Period

1000.00

Occupation

Chief engineer

Aggregate Year-to-Date-\$ 1000.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

E. Full Name, Mailing Address and ZIP Code

Howell Jones
Drawer 40
Sheldon SC 29941

Name of Employer

Student

Date (month,
day, year)

4/14/86

Amount of Cash
Receipt This Period

1000.00

Occupation

Aggregate Year-to-Date-\$ 1000.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

F. Full Name, Mailing Address and ZIP Code

Frank S Hanckel Jr
1 Coburg Rd
Charleston SC 29407

Name of Employer

Coburg Dairy Inc

Date (month,
day, year)

4/29/86

Amount of Cash
Receipt This Period

500.00

Occupation

President

Aggregate Year-to-Date-\$ 500.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

G. Full Name, Mailing Address and ZIP Code

Tom Orr
PO Box 39504
Charleston SC 29407

Name of Employer

I.R.

Date (month,
day, year)

5/1/86

Amount of Cash
Receipt This Period

250.00

Occupation

Aggregate Year-to-Date-\$ 250.00

Receipt For:

☒ Primary☐ General☐ Other (specify):

SUBTOTAL of Receipts This Page (optional)

4750.00

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

Part 1 of 1
 (See Instructions)
 This schedule should be filed with
 Summary of the General
 Summary Page

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of obtaining 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)			
1986: Steve Jones for Congress Committee 115584			
A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
James B Edwards 100 Venning St Mt Pleasant SC 29464	Medical University of S.C.	6/2/86	10000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: President	Aggregate Year-to-Date—\$ 10000	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt This Period
	Occupation		
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date—\$		
SUBTOTAL of Receipts This Page (optional)			
TOTAL This Period (last page this line number only)			10000.00

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1986 JULY QUARTERLY REPORT

LOANS

ATTACHMENT 5

LINE 1155-84
Also attach schedule
for each numbered line

Name of Committee (in Full)

1986: Steve Jones For Congress Committee 115584

A. Full Name, Mailing Address and ZIP Code of Loan Source

James B Edwards
100 Venning St
Mt Pleasant SC 29464Original Amount
of Loan

10,000

Cumulative Payment
To Date

-

Balance Outstanding at
Close of This Period

10,000

Election: ☒ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred 6/3/86

Date Due Demand

Interest Rate N/A % (apr)

☐ Secured

List All Endorsers or Guarantors (if any) to Item A

1. Full Name, Mailing Address and ZIP Code

None

Name of Employer

Occupation

Amount Guaranteed Outstanding:

\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:

\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:

\$

B. Full Name, Mailing Address and ZIP Code of Loan Source

Original Amount
of LoanCumulative Payment
To DateBalance Outstanding at
Close of This PeriodElection: ☐ Primary ☐ General ☐ Other (specify):

Terms: Date Incurred _____

Date Due _____

Interest Rate _____ % (apr)

☐ Secured

List All Endorsers or Guarantors (if any) to Item B

1. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:

\$

2. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:

\$

3. Full Name, Mailing Address and ZIP Code

Name of Employer

Occupation

Amount Guaranteed Outstanding:

\$

SUBTOTALS This Period This Page (optional)

TOTALS This Period (last page in this line only)

10000.00

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

034013133434



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

SEP 16 1986

John C. VonLehe, Treasurer
1986 Steve Jones for Congress
Committee
P.O. Box 32242
Charleston, SC 29417

Identification Number: C00198093

Reference: July Quarterly Report (5/22/86-6/30/86)

Dear Mr. VonLehe:

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 (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §§441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contributions in question were incompletely or incorrectly reported, you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

83040670457

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 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) 376-2480.

Sincerely,



Libby Cooperman
Reports Analyst
Reports Analysis Division

83040670458

1986 Steve Jones for Congress Committee
P.O. Box 32242
Charleston, SC 29417

September 25, 1986

REGULAR MAIL

SEP 26 1986

Office of the Clerk
US House of Representatives
Washington, DC 20515-6601

Re: 1986 Steve Jones for Congress Committee
ID: 115584

Dear Sirs:

This letter is in response to your notice dated September 2, 1986 concerning the \$10,000 loan made to the committee by James B. Edwards. I apologize for the delay in response, but since our campaign is winding down, our post office box is checked for mail bi-weekly now.

Please be advised that in preparing the Federal Election Commission report for the period ended June 30, 1986 that a loan was reported from Mr. Edwards on Schedule C. It was also reported on Schedule A (with a cross reference to line 13b on the detailed summary page). This was done, according to the instructions for preparing Schedule C, because "when a loan is received by the Committee, it must be itemized on Schedule A".

This is the first campaign that I have been associated with. Our committee has apparently confused South Carolina law with Federal law in thinking that an individual can make a loan rather than getting a bank loan. We regret this misunderstanding, and wish to clearly state that the loan was not made in willful neglect of the federal election commission laws.

A portion of this loan (\$6,000.00) was paid off July 26, 1986. An additional check for \$1,900.00 was paid to Mr. Edwards today. And a loan was taken out by Steve Jones for the balance of \$2,100 today, as soon as we were made aware of the mistake.

I hope this information is sufficient to clarify this problem. Please contact me if you have any further questions.

Yours truly,

Susan P. Miller

Susan P. Miller
Assistant Treasurer

SPM:ls/adm.17

cc: Federal Election Commission

Name of Committee (in Full)

1986: Steve Jones for Congress Committee

115584

Report Covering the Period

From July 1, 1986 to Sept. 30, 1986

I. RECEIPTS		COLUMN A Total This Period	COLUMN B Calendar Year to Date	
11. CONTRIBUTIONS (other than loans) FROM:				
(a) Individuals/Persons Other Than Political Committees	450.00	1150.00	67899.90	11 (a)
(b) Political Party Committees				11 (b)
(c) Other Political Committees			3100.00	11 (c)
(d) The Candidate			7500.00	11 (d)
(e) TOTAL CONTRIBUTIONS (other than loans (add 11 (a), 11 (b), 11 (c) and 11 (d)).		1150.00	78499.90	11 (e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES			.00	12
13. LOANS				
(a) Made or Guaranteed by the Candidate		2100.00	2100.00	13 (a)
(b) All Other Loans			10000.00	13 (b)
(c) TOTAL LOANS (add 13 (a) and 13 (b)).			12100.00	13 (c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		1218.31	1218.31	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)			.00	15
16. TOTAL RECEIPTS (add 11 (e), 12, 13 (c), 14 and 15)		4438.31	91818.21	16
II. DISBURSEMENTS				
17. OPERATING EXPENDITURES		1399.80	98504.38	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES				18
19. LOAN REPAYMENTS:				
(a) Of Loans Made or Guaranteed by the Candidate				19 (a)
(b) Of All Other Loans		10000.00	10000.00	19 (b)
(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b)).		10000.00	10000.00	19 (c)
20. REFUNDS OF CONTRIBUTIONS TO:				
(a) Individuals/Persons Other Than Political Committees				20 (a)
(b) Political Party Committees				20 (b)
(c) Other Political Committees				20 (c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))				20 (d)
21. OTHER DISBURSEMENTS				21
22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)		11399.80	98504.38	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	8	7463.34	23
24. TOTAL RECEIPTS THIS PERIOD (From Line 16)	8	4438.31	24
25. SUBTOTAL (Add Line 23 and Line 24)	8	11901.65	25
26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22)	8	11399.80	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25)	8	501.85	27

1 4 0 1 3 1 3 1 6 2 7

SCHEDULE B

**1986 OCTOBER QUARTERLY REPORT
ITEMIZED DISBURSEMENTS**

ATTACHMENT 9

(Use separate schedule for each category of the Detailed Summary Page)

Any information copied from such Reports and 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)

1986: Steve Jones for Congress Committee

115584

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
James B Edwards 100 Venning St Mt Pleasant SC 29464	loan repayment	7/24/86 9/22/86 9/25/86	6000.00 1900.00 2100.00
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 (last page this line number only)			10000.00

93347041034784632

vised 3/86

1986 OCTOBER QUARTERLY REPORT

ATTACHMENT 10

LOANS

For each numbered line

Name of Committee (in Full) 1986: Steve Jones for Congress Committee				115584	
A. Full Name, Mailing Address and ZIP Code of Loan Source James B Edwards 100 Vanning St Mt Pleasant SC 29464		Original Amount of Loan 10,000	Cumulative Payments To Date 10,000	Balance Outstanding at Close of This Period -0-	
Election <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Terms: Date Incurred 5/27/86 Date Due demand Interest Rate _____ % (april) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item A					
1. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
2. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
3. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payments To Date	Balance Outstanding at Close of This Period	
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (april) <input type="checkbox"/> Secured			
List All Endorsers or Guarantors (if any) to Item B					
1. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
2. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
3. Full Name, Mailing Address and ZIP Code		Name of Employer			
		Occupation			
		Amount Guaranteed Outstanding \$			
SUBTOTALS This Period This Page (optional)					
TOTALS This Period (last page in this line only)				-0-	
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.					

8 3 2 0 0 4 1 0 3 5 1 7 3 0 1 4 6 5 3 2 1

end!

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 86L-28
Staff: Jonathan Levin

SOURCE OF MUR: INTERNALLY GENERATED
RESPONDENTS NAMES: 1986 Steve Jones for Congress Committee.
John C. von Lehe, as treasurer
James B. Edwards
John C. von Lehe

RELEVANT STATUTES
AND REGULATIONS: 2 U.S.C. § 431(8)(A)(i)
2 U.S.C. § 431(8)(B)(vii)(I)
2 U.S.C. § 441a(1)(A)
2 U.S.C. § 441a(f)
11 C.F.R. § 100.7(b)(11)

INTERNAL REPORTS
CHECKS: Public Records

FEDERAL AGENCIES
CHECKED: None

SUMMARY OF ALLEGATIONS

The 1986 Steve Jones for Congress Committee ("the Committee"), the principal campaign committee of Steve Jones for the June 10 primary election in the First Congressional District of South Carolina, was referred to the Office of the General Counsel for the receipt of excessive loans and contributions from James B. Edwards. In order to repay the loan from Dr. Edwards, the Committee obtained another loan which appears to have resulted in excessive contributions by John C. von Lehe.

FACTUAL AND LEGAL ANALYSIS

The 1986 July Quarterly Report of the Committee disclosed a \$10,000 loan from James B. Edwards received on May 23, 1986, for the June 10 primary election. Previous reports of the Committee disclosed \$1,000 in total contributions from Mr. Edwards for the primary; i.e., a \$500 contribution on October 9, 1985, and a \$500 contribution on April 9, 1986.

On September 16, 1986, the Reports Analysis Division ("RAD") sent a Request for Additional Information ("RAFI") to the Committee regarding the loan and other contributions by Dr. Edwards. In a letter dated September 25, 1986, referring to a similar notice sent by the Clerk of the House on September 2, 1986, the Committee stated that it repaid \$6,000 on July 24 and \$1,900 on September 25. The Committee further stated that a loan "was taken out by [the candidate] for the balance of \$2,100 today, as soon as [the Committee was] made aware of the mistake."

A review of the 1986 October Quarterly Report of the Committee indicates that the Committee made repayments of \$6,000 on July 24, \$1,900 on September 22, and \$2,100 on September 26 for a total of \$10,000. The October Quarterly also discloses a \$2,100 loan to the Committee from the South Carolina National Bank with two guarantors listed. These were the candidate Steve Jones, and Committee treasurer John von Lehe, who had already contributed \$250 to the Committee on February 1, 1986, and \$750 to the Committee on February 6, 1986. The loan was listed as

being made on September 25, 1986, at an interest rate of "prime + 1%" and having a due date of January 25, 1987.

On November 4, 1986, RAD sent an RFAI to the Committee referring to Mr. von Lehe's contributions and apparent loan guarantee. On November 18, 1986, the Committee sent an amended October Quarterly omitting Mr. von Lehe as a guarantor.

Accompanying this amended report was a letter stating the following:

Upon receipt of your letter dated November 4, 1986 and upon further inquiry of both the lending bank and our candidate, we have found Mr. von Lehe was not a guarantor of the note. The note is a personal debt of Steve Jones only.

Section 441a(a)(1)(A) of Title 2 prohibits a person from making contributions to any candidate and his authorized committees with respect to a federal election which, in the aggregate, exceed \$1,000. Section 441a(f) prohibits the knowing acceptance of any contribution exceeding the limitations of 2 U.S.C § 441a. According to 2 U.S.C. § 431(8)(A)(i), a loan is a contribution. It appears that Dr. Edwards has made contributions totalling \$11,000 to the Committee. This Office, therefore, recommends that the Commission find reason to believe that James B. Edwards violated 2 U.S.C § 441a(a)(1)(A) and that the Committee and John C. von Lehe, as treasurer, violated 2 U.S.C § 441a(f).

With respect to the loan reported as being received by the Committee from the South Carolina National Bank, the Committee has stated that the original disclosure of Mr. von Lehe as a

guarantor was in error and that, therefore, he did not make an excessive contribution. This is the kind of reporting error, however, that is not easily explained by inadvertence. The only rational explanation would be that the Committee was the maker of the note and Mr. von Lehe, the treasurer, signed as an agent of the Committee, not as a guarantor.

According to 2 U.S.C § 431(8) (B) (vii) (I), a bank loan "shall be considered a loan by each endorser or guarantor, in that proportion of the unpaid balance that each endorser or guarantor bears to the total number of endorsers or guarantors." See also 11 C.F.R. § 100.7(b) (11). From the Committee reports, it appears that the Committee was the maker of a \$2,100 note. From the letter explaining the repayment of the Edwards loan and from the letter explaining whether von Lehe was a guarantor, it appears that the candidate was the maker. If the Committee was the maker, then Mr. von Lehe, if a liable signatory, was a co-endorser and, according to 2 U.S.C. § 431(8) (B) (vii) (I) and 11 C.F.R. § 100.7(b) (11), contributed \$1,050 of the loan. If the candidate was the maker, then Mr. von Lehe, if a liable signatory, was the only endorser and, therefore, contributed \$2,100. In either case, he would have contributed the endorsement amount plus \$1,000 in direct contributions. Based on the foregoing analysis, this Office recommends that the Commission find reason to believe that John C. von Lehe violated 2 U.S.C § 441a(a) (1) (A) in connection with his direct contributions and an apparent loan guarantee and that the

Committee and Mr. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f).

This Office also recommends that the Commission approve reason to believe notification letters to the Committee and to Mr. von Lehe that request the documents pertaining to the \$2,100 loan.

RECOMMENDATIONS

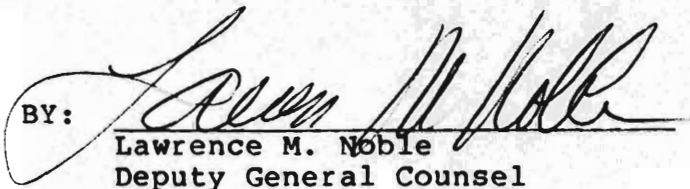
1. Find reason to believe that James B. Edwards violated 2 U.S.C. § 441a(a)(1)(A).
2. Find reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(i)(A).
3. Find reason to believe that the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f).
4. Approve the attached letters and General Counsel's Factual and Legal Analysis.

Charles N. Steele
General Counsel

88040670457
Date

2/17/87

BY:


Lawrence M. Noble
Deputy General Counsel

Attachments

1. Referral from RAD.
2. Proposed letter and analysis to the Committee.
3. Proposed letter and analysis to Dr. Edwards.
4. Proposed letter and analysis to Mr. von Lehe.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachments to First
General Counsel's Report

have been removed from this
position in the Public Record
File either because they duplicate
documents located elsewhere in
this file, or because they reflect
exempt information.

For Attachment	<u>1</u>	see	<u>1</u>
	<u>2</u>		<u>8</u>
	<u>3</u>		<u>8</u>
	<u>4</u>		<u>8</u>
	<u> </u>		<u> </u>

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

1986 Steve Jones for Congress Committee)
John C. von Lehe, as treasurer)

RAD Ref. 86L-28

(MUR
2352)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 20, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 86L-28:

1. Find reason to believe that James B. Edwards violated 2 U.S.C. § 441a(a)(1)(A).
2. Find reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(i)(A).
3. Find reason to believe that the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f).
4. Approve the letters and General Counsel's Factual and Legal Analysis, as recommended in the First General Counsel's Report signed February 17, 1987.

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

Attest:

2-24-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Deadline for vote - Friday, February 20, 1987 at 4:00 p.m.
Commission closed on Monday, February 23, 1987



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JOSHUA MCFADDEN *JM*

DATE: MARCH 10, 1987

SUBJECT: OBJECTION TO RAD Ref. 86L-28: MEMO. TO THE
COMMISSION
DATED MARCH 5, 1987

The above-captioned document was circulated to the
Commission on Friday, March 6, 1987 at 2:00 P.M.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____ X _____
Commissioner McDonald	_____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the Executive Session
agenda for March 17, 1987

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MEMORANDUM

TO: The Commission Secretary

FROM: Commissioner Josefiak

A handwritten signature, likely of Commissioner Josefiak, is written in ink next to the "FROM:" line.

SUBJECT: RAD Referral 86L-28

DATE: March 11, 1987

On March 9, 1987 I voted to object to the Recommendations of the General Counsel in Rad Referral 86L-28. I wish to withdraw my objection and be recorded as approving the recommendation.

Remove from Agenda March 17, 1987.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 5, 1987

SENSITIVE
07 MAR 5 11:24
COMMISSION SECRETARY

MEMORANDUM

TO: The Commission
FROM: Charles N. Steele
General Counsel
BY: Lawrence M. Noble *LM*
Deputy General Counsel
SUBJECT: Amendment of Certification in
RAD Ref. 86L-28

On February 20, 1987, the Commission found reason to believe that certain violations of the Act were committed in connection with apparently excessive contributions to the 1986 Steve Jones for Congress Committee. Because of a typographical error in the recommendation section of the First General Counsel's Report, the certification states that the Commission voted to find reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A). (See Attachment.) This Office intended to recommend that the Commission find reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A), as stated in the body of the First General Counsel's Report, the General Counsel's Factual and Legal Analysis, and the letter to Mr. von Lehe, as an individual. Therefore, this Office recommends that the Commission rescind the determination that there was reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A) and find reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A).^{*/} Because the applicable section is correctly cited in the analysis and letter to be sent to Mr. von Lehe, no further recommendation is being made as to approval of those documents.

The First General Counsel's Report also inadvertently omitted a recommendation to open a Matter Under Review. Therefore, the certification does not contain a Commission determination to open a MUR. Since this determination normally accompanies reason to believe determinations at the beginning of

^{*/} Normally, this Office does not recommend that the Commission rescind a reason to believe determination. However, due to the fact that this finding resulted from a typographical error and does not reflect a violation of any section of the statute, this Office makes the recommendation so the certification will reflect the finding intended by the Commission.

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a matter and the recommendation was omitted inadvertently, this Office recommends that the certification include a recommendation to Open a Matter Under Review.

Recommendation

1. Open a Matter Under Review in RAD Ref. 86L-28.
- 2.. Rescind the determination of reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A).
3. Find reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A).

Attachment
Certification

89040570473

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

1986 Steve Jones for Congress Committee)
John C. von Lehe, as treasurer)

RAD Ref. 86L-28

(MUR
2352)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 20, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 86L-28:

1. Find reason to believe that James B. Edwards violated 2 U.S.C. § 441a(a)(1)(A).
2. Find reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(i)(A).
3. Find reason to believe that the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f).
4. Approve the letters and General Counsel's Factual and Legal Analysis, as recommended in the First General Counsel's Report signed February 17, 1987.

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

Attest:

2-24-87

Date

Marjorie W. Emmons

Marjorie W. Emmons

Secretary of the Commission

Deadline for vote - Friday, February 20, 1987 at 4:00 p.m.
Commission closed on Monday, February 23, 1987

Attachment

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98040370474

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

1986 Steve Jones for Congress Committee
John C. von Lehe, as treasurer

)
)
) RAD Ref. 86L-28
)

(MUR
2352)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 11, 1987, the Commission decided by a vote of 6-0 to take the following actions in RAD Ref. 86L-28:

1. Open a Matter Under Review in RAD Ref. 86L-28.
2. Rescind the determination of reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A).
3. Find reason to believe that John C. von Lehe violated 2 U.S.C. § 441a(a)(1)(A).

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

Attest:

3-12-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary: Thurs., 3-5-87, 1:24
Circulated on 48 hour tally basis: Fri., 3-6-87, 2:00
Deadline for vote: Tues., 3-10-87, 4:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1987

Dr. James B. Edwards
100 Venning Street
Mt. Pleasant, SC 29464

Re: MUR 2352
James B. Edwards

Dear Dr. Edwards:

On February 20, 1987, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. 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. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, 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 the 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

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pursued. The Office of the 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 will not be entertained after briefs on probable cause have been mailed to the respondent.

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 the 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 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 Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

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

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 19, 1987

John C. von Lehe, Treasurer
1986 Steve Jones for Congress Committee
P.O. Box 32242
Charleston, SC 29417

Re: MUR 2352
1986 Steve Jones for Congress
Committee
John C. von Lehe, as treasurer

Dear Mr. von Lehe:

On February 20, 1987, the Federal Election Commission determined that there is reason to believe that the 1986 Steve Jones for Congress Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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 and you, as treasurer. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Such materials should include, but not be limited to, all contracts, notes, or other instruments in your possession pertaining to the \$2,100 loan reported by the Committee as received from the South Carolina National Bank on September 25, 1986. Please submit any such materials within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, 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 the 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

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Sincerely,



Scott E. Thomas
Chairman

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Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 19, 1987

John C. von Lehe
28 Broad Street
Charleston, SC 29401

Re: MUR 2352
John C. von Lehe

Dear Mr. von Lehe:

On March 11, 1987, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). 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. You may submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Such materials should include, but not be limited to, all contracts, notes, or other instruments in your possession pertaining to the \$2,100 loan reported by the Committee as received from the South Carolina National Bank on September 25, 1986. Please submit any such materials within fifteen days of your receipt of this letter. Statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against you, 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 the 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

8c

pursued. The Office of the 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 will not be entertained after briefs on probable cause have been mailed to the respondent.

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 the 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 authorizing such counsel to receive any notifications and other communications from the Commission.

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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 Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Scott E. Thomas
Chairman

Enclosures

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

8c

OF COUNSEL
JOSEPH E. YOUNG
O.L.B. RIVERS, JR.

LAW OFFICES
YOUNG, CLEMENT, RIVERS & TISDALE

28 BROAD STREET
P.O. Box 993
CHARLESTON, SOUTH CAROLINA 29402
(803) 577-4000
TELEX: 805-675

ROBERT L. CLEMENT, JR.
(S.C., N.C.)

THOMAS S. TISDALE, JR.
WILLIAM J. BATES
J. RUTLEDGE YOUNG, JR.
WALLACE O. HOLLAND
BRADISH J. WARING
W. JEFFERSON LEATH, JR.
(S.C., D.C. & MD.)

JOHN C. LEHE, JR.
TIMOTHY W. BOUCH
WILLIAM S. BOSS, JR.
E. MICHAEL BOWERS
CAROL B. ENVIN
JOSEPH E. DAPONE
(S.C. & OHIO)
W. WALTER HUNDEY
MICHAEL A. MOLONY
RANDELL C. STONEY, JR.
C. MICHAEL BRADMAN
STEPHEN P. GROVER
JUDITH T. JONES

*CERTIFIED SPECIALIST IN
TAXATION, ESTATE PLANNING
AND PROBATE LAW

March 25, 1987

PERSONAL AND CONFIDENTIAL

Scott E. Thomas, Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2352
John C. von Lehe

Dear Mr. Thomas:

This is in reference to your letter dated March 19, 1987, which I received on Monday, March 22nd. My purpose in writing is to inform you that I have not violated any provision of the Federal Election Campaign Act and hopefully to convince you of that fact. I did not act as endorser or guarantor or agent or anything else with regard to the Note which is described in the General Counsel's Factual and Legal Analysis. (I enclose a copy of that Note). I also enclose a copy of the Affidavit of the Lending Officer (Carlton Simons of South Carolina National Bank) who negotiated the loan in question. The loan was made directly to the candidate, Stephen L. Jones. It was not made to our Committee. I had nothing to do with the Note and as a matter of fact, I was never even asked about endorsing the Note.

I do want to apologize for our having furnished you misinformation concerning the Note. I was not aware that this misinformation had been sent to you until I received your letter of March 19th. Our Assistant Treasurer, who has done the yeoman's task in filing these documents, had received misinformation which she included in her Reports. A Report which was filed on September 30th, which I saw for the first time on March 24th, stated that I had guaranteed the loan. In fact, it was suggested that I might guarantee the loan, and our Assistant Treasurer believed that I had guaranteed it. In fact however, I was not

ever directly asked to guarantee the loan and, of course, I did not guarantee it. Nor did I co-sign it, nor was I ever obligated on that loan in any way whatsoever. This miscommunication to our Assistant Treasurer caused her to report that I had guaranteed the Note. When she was contacted concerning it on November 4, 1986, by Ms. Libby Cooperman, Reports Analyst, Reports Analysis Division, of the Federal Election Commission, our Assistant Treasurer (Susan P. Miller) sent a letter dated November 18, 1986, which stated that I was not a guarantor on the Note and that the Note was a personal debt of Stephen L. Jones only, and was not a debt of our campaign. (Copies of both letters are enclosed)

I will be glad to add any additional facts by way of supporting evidence or data that you would like to have, or that you would need.

I look forward to hearing from you in the near future.

With kind regards.

Sincerely,

John C. von Lehe, Jr.

JCVL, Jr.:db

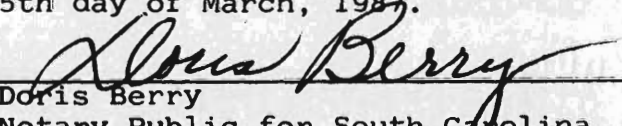
cc: Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

PERSONALLY appeared before me John C. von Lehe, Jr., who made oath that all matters contained in the above letter of March 25, 1987, addressed to Scott E. Thomas, are true and correct.

I so swear.


John C. von Lehe, Jr.

SWORN to before me this 25th day of March, 1987.


Doris Berry
Notary Public for South Carolina
My Commission Expires: 7/8/93

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

AFFIDAVIT

PERSONALLY appeared before me, Carlton Simons, who made oath as follows:

That he is a bank Officer at South Carolina National Bank, located in Charleston, South Carolina; that he was the Lending Officer involved in the loan which is evidenced by the attached Note, said loan being between Stephen L. Jones and South Carolina National Bank, in the amount of Two Thousand One Hundred Thirty (\$2,130.00) Dollars; that this Note was a personal Note from Stephen L. Jones to South Carolina National Bank, and not from the Steve Jones for Congress Committee. Furthermore, deponent states that said loan was not guaranteed by any one or any entity and specifically it was not guaranteed by John C. von Lehe. John C. von Lehe does not have and has never had any liability on said Note.

Carlton Simons
Carlton Simons

SWORN to before me this 25 day of March, 1987.

Peggy R. Mitchem
Notary Public for South Carolina
My Commission Expires: _____

NOTARY PUBLIC FOR SOUTH CAROLINA
MY COMMISSION EXPIRES DEC. 12, 1996
PEGGY R. MITCHEM



South Carolina National Bank

COMMERCIAL NOTE
(Unsecured or Secured by Security Agreement)

\$ 2130.00

OCT 14 86

For value received, the undersigned (jointly and severally if more than one) promises to pay to the order of THE SOUTH CAROLINA NATIONAL BANK

(the "Holder", which term shall include any holder hereof), the sum of Two Thousand one
Hundred Thirty & 00/100 Dollars, payable at The South Carolina National Bank, Phar, S.C.
(or at such other place as the Holder may designate) with

☐ Interest discounted at the rate of _____ % per annum being authorized;

☒ Interest from date at the rate of 9.00 % per annum;

principal and interest to be paid as follows:

☐ TIME The face amount of this Note is payable in full _____ days from date with interest having been discounted.

☒ TIME The principal amount of this Note is payable in full 104 days from date with interest thereon payable at Mat
beginning Jan 26, 1987 (Monthly, Quarterly, at Maturity or Other)

☐ DEMAND The principal amount of this Note is payable on demand with interest thereon payable _____, beginning _____, 19_____. (Monthly, Quarterly, Annually or Other)

☐ INSTALLMENT This Note is payable in _____ consecutive _____ installments of: _____ (Monthly, Quarterly, Annually or Other)

☐ (a) \$ _____ which includes interest, beginning on the _____ day of _____, 19_____, and due on the same day of each period thereafter until paid in full, with a final payment of the balance of said principal and interest due and payable on the _____ day of _____, 19_____.

☐ (b) \$ _____ principal plus interest, beginning on the _____ day of _____, 19_____, and due on the same day of each period thereafter until paid in full, with a final payment of the balance of said principal and interest due and payable on the _____ day of _____, 19_____.

☐ INSTALLMENT This Note is payable in installments as follows:

Interest shall be computed on the entire outstanding principal balance on the basis of a 365 day year for the actual number of days elapsed. All payments received shall be applied first to interest accrued and due, and the remainder, if any, to reduction of principal. All prepayments of principal, at the option of the Holder, shall be applied in inverse order of maturity.

This Note and any and all other indebtedness or liabilities of the undersigned to the Holder, however and whenever incurred or evidenced, whether direct or indirect, absolute or contingent (the "Obligations") shall, at the option of the Holder, become immediately due and payable in full, without presentment, demand, notice of dishonor or protest, in the event of non-payment when due of any amount payable on any of the Obligations, or if the Holder should deem itself insecure or the prospect of payment or performance is impaired for any reason whatsoever, including, but not limited to, the occurrence as to the undersigned, any endorser, guarantor, or surety of any of the following events: death, dissolution, termination of existence, insolvency, business failure, appointment of a receiver of any part of the property of, assignment for the benefit of creditors by, or the commencement of any proceeding under any bankruptcy or insolvency laws, or entry of any judgment, or failure to provide the Holder with financial information promptly when requested, or upon the occurrence of a default under the provisions of any agreement relating to or securing the payment of the Obligations.

The undersigned agrees that all property of the undersigned at any time coming into the possession of the Holder and also any balance of any deposit account of the undersigned with the Holder shall constitute additional collateral for the Obligations of the undersigned to the Holder so long as any of the Obligations are outstanding and owed to the Holder by the undersigned.

The undersigned and all endorsers, guarantors or sureties, jointly and severally, waive presentment, demand; notice of dishonor and non-payment or protest of this Note and all defenses on the ground of any extension of time or renewal (whether or not for longer than the original period) or the release or discharge of any party or the release, sale, exchange, substitution or impairment of any collateral with or without consideration.

Unpaid principal and interest due at maturity, or upon demand, shall bear interest at the rate set forth above until paid in full. In the event that this Note is not paid at maturity, either as originally provided or as accelerated under the terms hereof, the undersigned agrees to pay all costs and expenses of the Holder in the collection of this Note, including reasonable attorneys' fees of not less than 15% of the outstanding principal and interest.

This Note is made under and governed by the laws of the State of South Carolina and the undersigned hereby consents to the jurisdiction of all courts in said State.

☒ THIS NOTE IS UNSECURED OR ☐ THIS NOTE IS SECURED BY SECURITY AGREEMENT DATED _____

EXECUTED BY THE UNDERSIGNED.

13 Sandpiper Court
Address

[Signature] (SEAL)
(Type or Print Name)

Sub of Pecher SE
Address 29450

(Type or Print Name)

By its

Address

Amt of Note \$ <u>2130.00</u>	Renewal of \$ _____	Filing Fees _____	Int Rate <u>9</u>
Proceeds \$ <u>2129.78</u>	<input type="checkbox"/> Cr Acct # _____	Doc Stamps <u>22</u>	Discount <u>at Mat</u>
	<input type="checkbox"/> C.C. # _____	Sec. Uns. Ac. <u>11</u>	Collateral _____
Ins _____	Birth Date _____	Due Date <u>1/26/87</u>	Val Date <u>10/14/86</u> Days Int _____
			Off OK <u>CS</u>

98740570485



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

NOV 4 1986

John C. VonLehe, Treasurer
1986 Steve Jones for Congress
Committee
P.O. Box 32242
Charleston, SC 29417

Identification Number: C00198093

Reference: October Quarterly Report (7/1/86-9/30/86)

Dear Mr. VonLehe:

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 C of your report (pertinent portion attached) discloses contributions which appear to exceed the limits set forth in the Act. An individual or a political committee other than a multicandidate committee may not make contributions to a candidate for Federal office in excess of \$1,000 per election. If you have received a contribution which exceeds the limits, the Commission recommends that you refund to the donor the amount in excess of \$1,000. The Commission should be notified in writing if a refund is necessary. In addition, any refund should appear on Line 20 of the Detailed Summary Page and Schedule B of your next report. (2 U.S.C. §§441a(a) and (f))

The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.

If the contributions in question were incompletely or incorrectly reported, you may wish to submit documentation for the public record. Please amend your report with the clarifying information.

Although the Commission may take further legal steps concerning the acceptance of excessive contributions, prompt action by you to refund the excessive amounts will be taken into consideration.

88040670486

An amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 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) 376-2480.

Sincerely,

Libby Cooperman

Libby Cooperman
Reports Analyst
Reports Analysis Division

38040570437

1986: STEVE JONES FOR CONGRESS COMMITTEE
P.O. BOX 32242
CHARLESTON, S.C. 29417

November 18, 1986

Clerk of the House of Representatives
1036 Longworth House Office Building
Washington, D.C. 20515

Re: 1986 Steve Jones for Congress Committee
115584
I.D. # C00 198093

Dear Sirs:

Please find enclosed an amended FEC Form 3 report for the above referenced committee for the quarter ended September 30, 1986.

Upon receipt of your letter dated November 4, 1986 and upon further inquiry of both the lending bank and our candidate, we have found Mr. von Lehe was not a guarantor of the note. The note is a personal debt of Steve Jones only.

We appologize for any inconvenience this may have caused you. And trust this information is sufficient to resolve this matter.

Yours truly,

Susan P. Miller
Assistant Treasurer

cc SC State Election Commission
cc Mr. Stephen L. Jones

SPM:la

89040570498

JAMES B. EDWARDS
100 VENNING STREET
MOUNT PLEASANT, S.C. 29464

March 30, 1987

The Honorable Scott E. Thomas
Chairman
Federal Election Commission
Washington, D. C. 20563

Dear Mr. Thomas:

Thank you for your letter of recent date regarding my loan to the Steve Jones for Congress Committee.

Believing in good government and being an advocate for Mr. Jones, I took the initiative to borrow \$10,000 to assist the candidate until the necessary funding could be raised. At one time in the past, I assisted a statewide candidate in this manner and was not aware of F.E.C. rules prohibiting such loans to Federal candidates. I was, of course, aware of the \$1,000 donation limit but did not consider a loan in this category, as I attempted to contact ten people requesting \$1,000 contributions towards the loan.

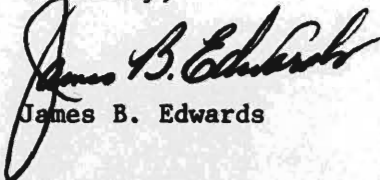
When this matter was called to the attention of Mrs. Sue Miller, Assistant Campaign Treasurer for Mr. Jones, by the F.E.C., corrective action was taken immediately. The Committee repaid a portion of the loan from contributions which had been received in the interim, and Mr. Jones took out a personal loan and repaid me the balance of the \$10,000 loan (\$2,130). I thought this was in compliance with the Federal statutes.

I can assure you that any mistakes made by me were not intentional. While I realize that ignorance of the law is not an excuse, I was unaware that the loan was improper.

Attached is a statement from Mr. Carlton Simons of the South Carolina National Bank confirming the actions taken.


I will be pleased to address any questions and regret any impropriety.

Sincerely,


James B. Edwards

Attachment

SUBSCRIBED AND SWORN TO BEFORE ME
this 30th day of March, A.D. 1987.


Notary Public
My Commission expires: 12/19/89

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

AFFIDAVIT

PERSONALLY appeared before Susan P. Miller who, being duly sworn, testified as follows: That she is and has been Assistant Treasurer of the Steve Jones for Congress Committee. That in her capacity as Assistant Treasurer she received the sum of Ten Thousand (\$10,000.00) Dollars from Dr. James B. Edwards on May 23, 1986, which amount she reported to the Federal Elections Commission has having been a loan from Dr. Edwards. That upon receiving information from the Federal Elections Commission that said loan was improper, she instructed Dr. Edwards to that effect and repaid him the majority of the amount of said loan from the Committee's Treasury. The balance of the loan in the amount of Two Thousand One Hundred Thirty (\$2,130.00) Dollars was repaid to Dr. Edwards by Stephen L. Jones from funds which he personally borrowed from South Carolina National Bank.

Susan P. Miller
Susan P. Miller

SWORN to before me this 30th day of March, 1987.

Ernesta H. Guillard
Notary Public for South Carolina
My Commission Expires: Feb. 9, 1993

STATE OF SOUTH CAROLINA)
)
COUNTY OF CHARLESTON)

AFFIDAVIT

PERSONALLY appeared before me Carlton Simons who, being duly sworn, stated that he is a Lending Officer at South Carolina National Bank. That on MAY 28, 1986 he lent the sum of Ten Thousand (\$10,000.00) Dollars to Dr. James B. Edwards, which sum he, on information and belief, understands that Dr. Edwards lent to the Steve Jones for Congress Committee. That on information and belief he understands that the loan to the Committee was repaid from Committee contributions in the amount of \$ 7870.00 and through a second loan which was obtained by Stephen L. Jones personally from South Carolina National Bank in the amount of Two Thousand One Hundred Thirty (\$2,130.00) Dollars.

Carlton Simons
Carlton Simons

SWORN to before me this 30 day of March, 1987

Robert A. Boone
Notary Public for South Carolina
My Commission Expires: 3-8-1995

88040670491

CCC# 3069

LAW OFFICES
YOUNG, CLEMENT, RIVERS & TISDALE

OF COUNSEL
JOSEPH R. YOUNG
O.L.B. RIVERS, JR.

28 BROAD STREET
P.O. Box 993
CHARLESTON, SOUTH CAROLINA 29402
(803) 577-4000
TELEX: 805-675

ROBERT L. CLEMENT, JR.
(S.C., N.C.)
THOMAS S. TISDALE, JR.
WILLIAM J. BATES
J. RUTLEDGE YOUNG, JR.
WALLACE O. HOLLAND
BRADISH J. WARING
W. JEFFERSON LEATH, JR.
(S.C., D.C. & MD.)
JOHN C. VON LEHE, JR.
TIMOTHY W. BOUCH
WILLIAM BOBO, JR.
H. MICHAEL BOWERS
CAROL R. ERVIN
JOSEPH E. JARQUE
(S.C. & OHIO)
WALTER HUNDLEY
MICHAEL A. MOUDON
RANDALL C. STONEY, JR.
MICHAEL BRANHAM
STEPHEN P. GROVES
JUDITH L. TENUE

APR 7 1987
9:18
CERTIFIED SPECIALIST IN
FEDERAL ELECTION LAW, ESTATE PLANNING
AND PROBATE LAW

April 2, 1987

PERSONAL AND CONFIDENTIAL

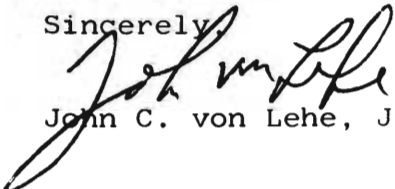
Scott E. Thomas, Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 2352
John C. von Lehe

Dear Mr. Thomas:

I am writing you on behalf of the Steve Jones for Congress Committee, of which I served as Treasurer. The purpose of this letter is to request pre-probable cause conciliation on behalf of the Committee based upon the facts as outlined in a letter to you of March 30th from Dr. James B. Edwards.

Thank you for your consideration in this matter.

Sincerely,

John C. von Lehe, Jr.

JCVL, Jr.:db

cc: Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

87 APR 8 11:00

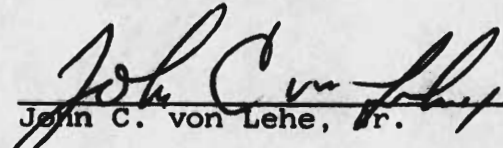
PERSONALLY appeared before me John C. von Lehe, Jr., who made

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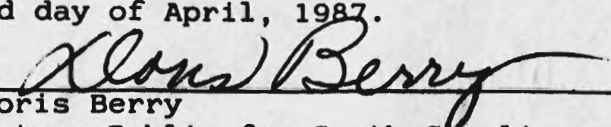
11

oath that all matters contained in the above letter of April 2, 1987, addressed to Scott E. Thomas, are true and correct.

I so swear.


John C. von Lehe, Jr.

SWORN to before me this 2nd day of April, 1987.


Doris Berry
Notary Public for South Carolina
My Commission Expires: 7/8/93

88040670493

11

James B. Edwards
100 Venning Street
Mt. Pleasant, S.C. 29464

Scott E. Thomas, Chairman
Federal Election Commission
Washington, D.C. 10563

Dear Mr. Thomas:

My purpose in writing is to amend my letter of March 30, 1987, to seek pre-probable cause conciliation.

Thank you very much for your consideration in this matter.

Sincerely,

James B. Edwards
James B. Edwards

cc: Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

SUBSCRIBED AND SWORN TO BEFORE ME
this 3rd day of April, A.D. 1987.

Jillie W. Jenkins

Notary Public
My Commission expires: 12/19/89

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
1986 Steve Jones for Congress)
Committee) MUR 2352
John C. von Lehe, as treasurer)
James B. Edwards)
John C. von Lehe)

87 MAY 7 P4:34

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OFFICE OF THE REC
COMM-FED ELEC
ARY

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter involves allegations as to the receipt of excessive contributions by the 1986 Steve Jones for Congress Committee ("the Committee") from James B. Edwards and John C. von Lehe, the Committee treasurer. The Committee's 1986 July Quarterly Report disclosed a \$10,000 loan from Dr. Edwards on May 23, 1986, for the June 10 primary election. Previous reports of the Committee disclosed \$1,000 in total contributions from Dr. Edwards for the primary, i.e., a \$500 contribution on October 9, 1985, and a \$500 contribution on April 9, 1986. The Committee's 1986 October Quarterly Report indicated that the Committee made repayments on the loan of \$6,000 on July 24, \$1,900 on September 22, and \$2,100 on September 26.

The same report also disclosed a \$2,100 loan to the Committee from the South Carolina National Bank with two guarantors listed, the candidate and Mr. von Lehe who had already contributed \$250 to the Committee on February 1, 1986, and \$750 to the Committee on February 6, 1986. Although an amendment was filed eliminating Mr. von Lehe's name along with a letter stating that Mr. von Lehe was not a guarantor, this Office recommended that the Commission seek a further explanation.

On February 20, 1987, the Commission found reason to believe that Dr. Edwards violated 2 U.S.C. § 441a(a)(1)(A) and reason to believe that the Committee and Mr. von Lehe, as treasurer, violated 2 U.S.C. § 441a(f).^{1/} On March 11, the Commission determined that there was reason to believe that Mr. von Lehe violated 2 U.S.C. § 441a(a)(1)(A). On March 31, 1987, this Office received a response from Mr. von Lehe. This response included a letter from Mr. von Lehe explaining the circumstances of the \$2,100 loan, documents pertaining to that loan, and a letter from Dr. Edwards explaining the circumstances of his loan to the Committee. (See Attachments 1 and 2.) On April 7, 1987, this Office received a request for pre-probable cause conciliation from Mr. von Lehe on behalf of the Committee "based upon the facts as outlined in a letter to you of March 30 from Dr. James B. Edwards." (See Attachment 3.) Along with that letter was a request from Dr. Edwards for pre-probable cause conciliation. (See Attachment 4.)

The response of Mr. von Lehe explaining the \$2,100 loan states that he "did not act as an endorser or guarantor or agent or anything else" with regard to the loans. He explains that the Committee's assistant treasurer had received misinformation which she included in the October Quarterly Report. He states

^{1/} The notification letters to the respondents were not mailed until March 19, 1987, pending the amendment of a determination with respect to John von Lehe as an individual.

that "it was suggested that [he] might guarantee the loan" and that the assistant treasurer believed that he had done so. He maintains, however, that he was never directly asked and never guaranteed the loan in any way. Mr. von Lehe then refers to a letter sent by the Committee assistant treasurer on November 18 in response to a Request for Additional Information, stating that Mr. von Lehe was not a guarantor and that the loan note was a personal debt of the candidate only.

Enclosed with Mr. von Lehe's letter is an affidavit from an officer of the lending bank stating that the loan note was a personal note from the candidate guaranteed by no one else. Enclosed also is a copy of the note containing only the candidate's signature.

The letter from Dr. Edwards admits a violation of 2 U.S.C. § 441a(a)(1)(A). Dr. Edwards states that he "took the initiative to borrow \$10,000 to assist the candidate until the necessary funding could be raised." He states that he had once assisted a statewide candidate in this manner and was not aware of the prohibition on "such loans" to federal candidates. He states that he was "aware of the \$1,000 donation limit but did not consider a loan in this category, as [he] attempted to contact ten people requesting \$1,000 contributions toward the loan." Dr. Edwards also refers to the Committee's attempts to rectify the situation shortly after being notified by RAD. He encloses an affidavit from an officer of the South Carolina National Bank stating that the bank lent \$10,000 to Dr. Edwards "which sum [the

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bank officer], on information and belief, understands that Dr. Edwards lent to the Steve Jones for Congress Committee." He also encloses an affidavit from the Committee's assistant treasurer stating that the Committee had received a \$10,000 loan from Dr. Edwards, that, upon receiving information from the Commission that the loan was improper, the Committee repaid most of the loan, and that the balance of the loan was repaid by the candidate from funds the candidate borrowed from the bank.^{2/}

II. ANALYSIS

Section 441a(a)(1)(A) of Title 2 prohibits a person from making contributions to any candidate and his authorized committees with respect to a federal election which, in the aggregate, exceed \$1,000. Section 441a(f) prohibits the knowing acceptance of any contribution exceeding the limitations of 2 U.S.C. § 441a. According to 2 U.S.C. § 431(8)(A)(i), a loan is a contribution. The responses of Dr. Edwards and the subsequent conciliation request by Mr. von Lehe indicate that Dr. Edwards made excessive contributions accepted by the Committee. The contributions of Dr. Edwards are addressed in the conciliation agreements proposed for the Committee and Dr. Edwards.

The evidence presented by Mr. von Lehe indicates that he did not make excessive contributions to the Committee. The

^{2/} This Office notes that the Committee reported a return of \$6,000 to Dr. Edwards on July 24, 1986, almost two months prior to notification from RAD. Therefore, this affidavit appears to be at some variance with the Committee's disclosure of the return of the contribution. Nevertheless, it does not contradict the allegation of an excessive loan.

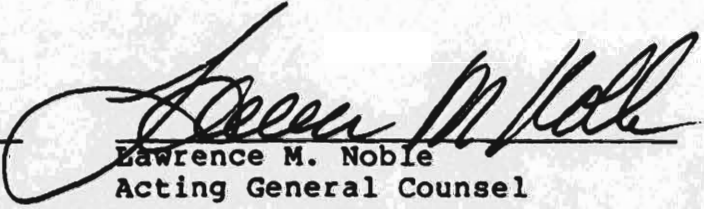
conciliation agreement to be sent to the Committee, therefore, will not refer to the allegation as to the \$2,100 loan to the Committee. This allegation will be addressed at a subsequent stage of the enforcement process.

III. RECOMMENDATIONS

1. Enter into conciliation with Dr. James B. Edwards prior to a finding of probable cause to believe.
2. Enter into conciliation with the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, prior to a finding of probable cause to believe.
3. Approve the attached proposed conciliation agreements and letters.

Date

6/7/87


Lawrence M. Noble
Acting General Counsel

Attachments

1. Response letter and documents from Mr. von Lehe
2. Response letter and documents from Dr. Edwards
3. Conciliation request from Mr. von Lehe on behalf of the Committee

4. Conciliation request from Dr. Edwards
5. Proposed letter and conciliation agreement to be sent to the Committee
6. Proposed letter and conciliation agreement to be sent to Dr. Edwards

38040670500



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Attachments to General
Counsel's Report

have been removed from this position in the Public Record File either because they duplicate documents located elsewhere in this file, or because they reflect exempt information.

For Attachment 1 see 9
2 10
3 11
4 12

83040670501



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

MEMORANDUM TO: LAWRENCE M. NOBLE
ACTING GENERAL COUNSEL

FROM: MARJORIE W. EMMONS / JOSHUA MCFADDEN *JM*

DATE: MAY 13, 1987

SUBJECT: OBJECTION TO MUR 2352 - General Counsel's Report
Signed May 7, 1987

The above-captioned document was circulated to the
Commission on Friday, May 8, 1987 at 12:00 P.M.

Objections have been received from the Commissioners
as indicated by the name(s) checked:

Commissioner Aikens	_____
Commissioner Elliott	_____
Commissioner Josefiak	_____
Commissioner McDonald	_____ X _____
Commissioner McGarry	_____
Commissioner Thomas	_____

This matter will be placed on the Executive Session
agenda for May 19, 1987.

Please notify us who will represent your Division
before the Commission on this matter.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1987

MEMORANDUM

TO: Marjorie W. Emmons
Commission Secretary

FROM: Danny L. McDonald
Commissioner

RE: Withdrawal of Objection.

I would like to withdraw my objection to MUR 2352 and cast my vote in the affirmative.

Thank you for your attention in this matter.

07 MAY 14 P 2:30

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

1986 Steve Jones for Congress
Committee
John C. von Lehe, as treasurer

James B. Edwards

John C. von Lehe

MUR 2352

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 14, 1987, the Commission decided by a vote of 6-0 to take the following actions in MUR 2352:

1. Enter into conciliation with Dr. James B. Edwards prior to a finding of probable cause to believe.
2. Enter into conciliation with the 1986 Steve Jones for Congress Committee and John C. von Lehe, as treasurer, prior to a finding of probable cause to believe.
3. Approve the proposed conciliation agreements and letters, as recommended in the General Counsel's Report signed May 7, 1987.

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

Attest:

5-15-87

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Office of Commission Secretary Thurs., 5-7-87, 4:34
Circulated on 48 hour tally basis: Fri., 5-8-87, 12:00
Deadline for vote: Thurs., 5-12-87, 4:00



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 19, 1987

Dr. James B. Edwards
100 Venning Street
Mt. Pleasant, SC 29464

Re: MUR 2352
James B. Edwards

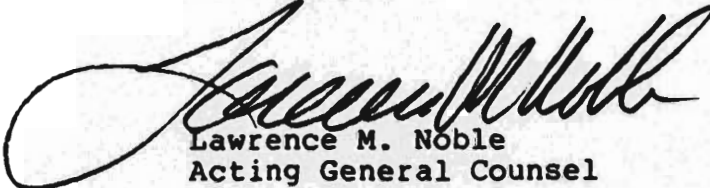
Dear Dr. Edwards:

On February 20, 1987, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A). At your request the Commission, on May 14, 1987, determined to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations prior to a finding of probable cause to believe are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,


Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 19, 1987

John C. von Lehe, Esquire
Young, Clement, Rivers &
Tisdale
28 Broad Street
P.O. Box 993
Charleston, SC 29402

Re: MUR 2352
1986 Steve Jones for Congress
Committee
John C. von Lehe, as treasurer

Dear Mr. von Lehe:

On February 20, 1987, the Federal Election Commission found reason to believe that the 1986 Steve Jones for Congress Committee ("the Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f) in connection with the receipt of apparently excessive contributions from James B. Edwards. At your request the Commission, on May 14, 1987, determined to enter into negotiations directed towards reaching a conciliation agreement with respect to those contributions prior to a finding of probable cause to believe.

Enclosed is a conciliation agreement that the Commission has approved. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations prior to a finding of probable cause to believe are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

If you have any questions or suggestions for changes in the agreement, or if you wish to arrange a meeting in connection with a mutually satisfactory conciliation agreement, please contact Jonathan Levin, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble
Acting General Counsel

Enclosure
Conciliation Agreement

18



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

M03-14-88

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 2852 ✓

88040575335

OF COUNSEL
JOSEPH R. YOUNG
O.L.R. RIVERS, JR.

LAW OFFICES

YOUNG, CLEMENT, RIVERS & TISDALE

28 BROAD STREET

P.O. Box 993

CHARLESTON, SOUTH CAROLINA 29402

(803) 577-4000

TELEX: 805-675

August 4, 1987

PERSONAL AND CONFIDENTIAL

Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Johnny:

I spoke to Steve Jones today and he asked me to forward our most recent Election Report directly to you. Although I know you are not in the Compliance Section, I would appreciate it if you would review the Report with someone in Compliance, and make sure that we have correctly handled the reporting of the bank loan that Steve Jones guaranteed in order to allow our Committee to repay Dr. Edwards. We simply don't want to shoot ourselves in the foot again. If it needs to be changed we will be glad to change it and refile. As you know, the upshot of the matter is that Dr. Edwards' loan was repaid by the Committee, partially from funds that the Committee collected and partially from an infusion of cash which was obtained by Steven Jones.

I very much appreciate your help in this matter, and would appreciate a call from you when you have had a chance to take a look at the Report, perhaps with the benefit of the help from your Compliance Officer.

With kind regards.

Sincerely,

John C. von Lehe, Jr.

JCVL, Jr.:db
Enclosure

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JOSEPH L. CLEMENT, JR.
(S.C., N.C.)

THOMAS S. TISDALE, JR.
WILLIAM J. BATES
J. BUTLEDOR YOUNG, JR.
WALLACE G. HOLLAND
BRADISH J. WARING
W. JEFFERSON LEATE, JR.
(S.C., D.C. & MD.)

JOHN C. VON LEHE, JR.*
TIMOTHY W. BOUCH
WILLIAM BOBO, JR.
H. MICHAEL BOWERS
CAROL B. ERVIN
JOSEPH E. DAPORE
(S.C. & ORIO)

R. WALTER MUNDLEY
MICHAEL A. MOLONY
RANDELL C. STONEY, JR.
C. MICHAEL BRANHAM
STEPHEN P. GROVES
JUDITH L. FINNIF

*CERTIFIED SPECIALIST IN
TAXATION LAW, ESTATE PLANNING
AND PROBATE LAW

93040675336

RECEIVED
GENERAL COUNSEL

87 AUG 5 P 1:20

OF COUNSEL
JOSEPH E. YOUNG
O.L.B. RIVERS, JR.

LAW OFFICES

YOUNG, CLEMENT, RIVERS & TISDALE

28 BROAD STREET

P.O. Box 993

CHARLESTON, SOUTH CAROLINA 29402

(803) 577-4000

TELEX: 805-675

August 4, 1987

PERSONAL AND CONFIDENTIAL

Jonathan Levin, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Dear Johnny:

I spoke to Steve Jones today and he asked me to forward our most recent Election Report directly to you. Although I know you are not in the Compliance Section, I would appreciate it if you would review the Report with someone in Compliance, and make sure that we have correctly handled the reporting of the bank loan that Steve Jones guaranteed in order to allow our Committee to repay Dr. Edwards. We simply don't want to shoot ourselves in the foot again. If it needs to be changed we will be glad to change it and refile. As you know, the upshot of the matter is that Dr. Edwards' loan was repaid by the Committee, partially from funds that the Committee collected and partially from an infusion of cash which was obtained by Steven Jones.

I very much appreciate your help in this matter, and would appreciate a call from you when you have had a chance to take a look at the Report, perhaps with the benefit of the help from your Compliance Officer.

With kind regards.

Sincerely,

John C. von Lehe, Jr.

JCVL, Jr.:db
Enclosure

GCC 4090
RECEIVED BY THE FEC
- NNN 2352

87 AUG 5 AM: 37

ROBERT L. CLEMENT, JR.
(S.C., N.C.)
THOMAS S. TISDALE, JR.
WILLIAM J. BATES
J. BUTLER YOUNG, JR.
WALLACE G. HOLLAND
BRADISH J. WARING
W. JEFFERSON LEATH, JR.
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AND PROBATE LAW

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77 AUG 5 P 1:20

REPORTS OF RECEIPTS AND DISBURSEMENTS
For Authorized Committee

RECEIVED AT THE FEC

(Summary Page)

87 AUG 5 AID: 37

1. Name of Committee (in Full) 1986: STEVE JONES For Congress	2. FEC Identification Number 115584
Address (Number and Street) 13 SANDPIPER CT	3. Is this Report an Amendment? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
City, State and Zip Code Isle of Palms, S.C. 29451	<input checked="" type="checkbox"/> Check if address is different than previously reported

4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input type="checkbox"/> Twelfth day report preceding _____ (Type of Election)
<input type="checkbox"/> July 15 Quarterly Report	election on _____ in the State of _____
<input type="checkbox"/> October 15 Quarterly Report	<input type="checkbox"/> Thirtieth day report following the General Election on _____
<input type="checkbox"/> January 31 Year End Report	_____ in the State of _____
<input checked="" type="checkbox"/> July 31 Mid Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

This report contains activity for - ☒ Primary Election ☐ General Election ☐ Special Election ☐ Runoff Election

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period JAN 1, 1987 through JUNE 30, 1987		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (From Line 11 (e))	1,000.00	79499.90
(b) Total Contribution Refunds (from Line 20 (d))		
(c) Net Contributions (other than loans) (subtract Line 6 (b) from 6 (a))	1,000.00	79499.90
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	32.71	88,550.92
(b) Total Offsets to Operating Expenditures (from Line 14)	-0-	1,218.31
(c) Net Operating Expenditures (Subtract Line 7 (b) from 7 (a))	32.71	87332.61
8. Cash on Hand at Close of Reporting Period (from Line 27)	10.31	
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	-0-	
10. Debts and Obligations Owed BY The Committee (Itemize all on Schedule C or Schedule D)	-0-	

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

For further information, contact:
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463
Toll Free 800-424-9530
Local 202-376-3120

John C. van Lehe, Jr.
Type or Print Name of Treasurer

John C. van Lehe
SIGNATURE OF TREASURER

8/4/87
Date

NOTE: Submission of false erroneous or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3 (3-80)

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in Full)

1986: STEVE JONES FOR CONGRESS

Report Covering the Period

From: JAN. 1, 1987 To: JUNE 30, 1987

I. RECEIPTS

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees
(Memo Entry Unitemized \$ _____)

(b) Political Party Committees

(c) Other Political Committees

(d) The Candidate

(e) TOTAL CONTRIBUTIONS (other than loans (add 11(a), 11(b), 11(c) and 11(d)).

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES

13. LOANS:

(a) Made or Guaranteed by the Candidate

(b) All Other Loans

(c) TOTAL LOANS (add 13 (a) and 13 (b)).

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

15. OTHER RECEIPTS (Dividends, Interest, etc.)

16. TOTAL RECEIPTS (add 11 (a), 12, 13 (c), 14 and 15)

II. DISBURSEMENTS

17. OPERATING EXPENDITURES

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed by the Candidate

(b) Of All Other Loans

(c) TOTAL LOAN REPAYMENTS (add 19 (a) and 19 (b)).

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other Than Political Committees

(b) Political Party Committees

(c) Other Political Committees

(d) TOTAL CONTRIBUTION REFUNDS (add 20 (a), 20 (b), and 20 (c))

21. OTHER DISBURSEMENTS

22. TOTAL DISBURSEMENTS (add 17, 18, 19 (c), 20 (d) and 21)

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD \$ 493.02 23

24. TOTAL RECEIPTS THIS PERIOD (From Line 16) \$ 1000.00 24

25. SUBTOTAL (Add Line 23 and Line 24) \$ 1493.02 25

26. TOTAL DISBURSEMENTS THIS PERIOD (From Line 22) \$ 1482.71 26

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (Subtract Line 26 from 25) \$ 10.31 27

93040675339

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 11(2)

Any information copied from such Reports and 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)

1986: STEVE JONES FOR CONGRESS 115584

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>ROBERT H. KENNEDY, JR. 1331 KENWOOD AVE. COLUMBIA, S.C. 29201</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>GMIK ASSOC.</p> <p>Occupation</p> <p>ARCHITECT</p> <p>Aggregate Year-to-Date > \$ 250.00</p>	<p>Date (month, day, year)</p> <p>1/29/87</p>	<p>Amount of Each Receipt this Period</p> <p>250.00</p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>WM N. GEIGER 1331 KENWOOD AVE. COLUMBIA, S.C. 29201</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>GMIK ASSOC.</p> <p>Occupation</p> <p>ARCHITECT</p> <p>Aggregate Year-to-Date > \$ 500.00</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p> <p>500.00</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>THOMAS MCANAN 1117 Adgen Rd. COLUMBIA, S.C. 29205</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>GMIK ASSOC</p> <p>Occupation</p> <p>FISCAL OFFICER</p> <p>Aggregate Year-to-Date > \$ 250.00</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p> <p>250.00</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date > \$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt this Period</p>

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

1000.00

83040515340

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 19(a)

Any information copied from such Reports and 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)

1986: STEVE JONES FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code S.C. NATIONAL BANK Broad St Charleston, S.C. 29401	Purpose of Disbursement LOAN REPAYMENT Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 1/15/87 1/30/87	Amount of Each Disbursement This Period 450.00 1000.00
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)

1450.00

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SCHEDULE C
(Revised 3/80)

LOANS

Page 1 of 1 for
LINE NUMBER _____
(Use separate schedules
for each numbered line)

Name of Committee (in Full) 1986: STEVE JONES FOR CONGRESS			
A. Full Name, Mailing Address and ZIP Code of Loan Source S.C. National Bank Broad St Charleston, S.C. 29401		Original Amount of Loan 2100.00	Cumulative Payment To Date 1450.00
Election: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Balance Outstanding at Close of This Period 650.00	
Terms: Date Incurred 9/25/86 Date Due DEMAND Interest Rate 9 % (apr)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item A			
1. Full Name, Mailing Address and ZIP Code STEPHEN L. JONES 13 SANDPIPER COURT Isle of Palms, S.C. 29457		Name of Employer Medical Univ. Occupation OF S.C. Admin. Asst Amount Guaranteed Outstanding: \$ 650	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
B. Full Name, Mailing Address and ZIP Code of Loan Source		Original Amount of Loan	Cumulative Payment To Date
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Balance Outstanding at Close of This Period	
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr)		<input type="checkbox"/> Secured	
List All Endorsers or Guarantors (if any) to Item B			
1. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding \$	
2. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
3. Full Name, Mailing Address and ZIP Code		Name of Employer	
		Occupation	
		Amount Guaranteed Outstanding: \$	
SUBTOTALS This Period This Page (optional)			
TOTALS This Period (last page in this line only)		650.00	
Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.			

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page ____ of ____ for
LINE NUMBER ____
(Use separate schedules
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

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