



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20461

THIS IS THE END OF MUR # 948

Date Filmed 9/18/79 Camera No. --- 2

Cameraman bpc

79040133559

RETURN RECEIPT. REGISTERED. INSURED AND CERTIFIED MAIL

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

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

☐ Show to whom and date delivered \$

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

☐ RESTRICTED DELIVERY
Show to whom and date delivered \$

☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery \$

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

R. H. Harper

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>123745</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

[Signature]

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

☆GPO 1977-0-249-595

PS Form 3811, Apr. 1971

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

44-38861-1000

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

☐ Show to whom and date delivered

☐ Show to whom, date, and address of delivery

☐ RESTRICTED DELIVERY
Show to whom and date delivered

☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

John Kroy Stephens

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

943749

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY



SEP 7 1979

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S INITIALS

☆GPO 1977-0-240-000

● SENDER Complete items 1, 2, and 3 Add your address in the RETURN TO space on reverse	
1. The following service is requested (check one). <input type="checkbox"/> Show to whom and date delivered. _____ <input type="checkbox"/> Show to whom, date, and address of delivery. _____ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered. _____ <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery. \$ _____ (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: <div style="font-size: 2em; font-family: cursive;">David C. Kuhlman</div>	
3. ARTICLE DESCRIPTION REGISTERED NO _____ CERTIFIED NO _____ INSURED NO _____	(Always obtain signature of addressee or agent) I have received the article described above SIGNATURE  Addressee <input type="checkbox"/> Authorized agent
4. DATE OF DELIVERY <div style="font-size: 1.5em; font-family: cursive;">4-7-79</div>	5. ADDRESS (Complete only if requested) <div style="text-align: right;">  </div>
6. UNABLE TO DELIVER BECAUSE:	
CLERK'S INITIALS 	

PS Form 3811, Apr. 1977

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

1953510662

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

174R 942

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

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

2. ARTICLE ADDRESSED TO:
Harvey Tettlebaum

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

I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent
Velon Bright
9-10-79

4. DATE OF DELIVERY _____ POSTMARK _____

5. ADDRESS (Complete only if requested)

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



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 31, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Krey Stephens
Krey Packing Company
Post Office Box 208, MPO
St. Louis, Missouri 63166

Re: MUR 948

Dear Mr. Stephens:

The Commission has determined to take no further action against the Krey Packing Company regarding the violation of 2 U.S.C. § 441b(a). Accordingly, we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagen at (202) 523-4060.

Sincerely,

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

William C. Oldaker
General Counsel

79040153562

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Krey Stephens
Krey Packing Company
Post Office Box 208, MPO
St. Louis, Missouri 63166

Re: MUR 948

Dear Mr. Stephens:

The Commission has determined to take no further action against the Krey Packing Company regarding the violation of 2 U.S.C. § 441b(a). Accordingly, we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagen at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

79040153563

[Handwritten signature]



FEDERAL ELECTION COMMISSION

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

August 31, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. R.H. Harper
Nooter Corporation
P.O. Box 451
St. Louis, Missouri 63166

Re: MUR 948

Dear Mr. Harper:

The Commission has determined to take no further action against the Nooter Corporation regarding the violation of 2 U.S.C. § 441b(a). Accordingly we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagen at (202) 523-4060.

Sincerely,

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

William C. Oldaker
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. R.H. Harper
Nooter Corporation
P.O. Box 451
St. Louis, Missouri 63166

Re: MUR 948

Dear Mr. Harper:

The Commission has determined to take no further action against the Nooter Corporation regarding the violation of 2 U.S.C. § 441b(a). Accordingly we ~~have~~ closing the file in this matter.

If you have any questions, please contact Frances B. Hagen at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

fh

7901013356



FEDERAL ELECTION COMMISSION

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

August 31, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David E. Kuhlman, Vice President
Monroe City Diecasting Company
135 Front Street
Monroe City, Missouri 63456

Re: MUR 948

Dear Mr. Kuhlman:

The Commission has determined to take no further action against the Monroe City Diecasting Company regarding the violation of 2 U.S.C. § 441b(a). Accordingly, we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagan at (202) 523-4060.

Sincerely,

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

William C. Oldaker
General Counsel



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David E. Kuhlman, Vice President
Monroe City Diecasting Company
135 Front Street
Monroe City, Missouri 63456

Re: MUR 948

Dear Mr. Kuhlman:

The Commission has determined to take no further action against the Monroe City Diecasting Company regarding the violation of 2 U.S.C. § 441b(a). Accordingly, we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagan at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

WCO

7 9 9 1 0 1 1 3 5 6 7



FEDERAL ELECTION COMMISSION

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

August 31, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Harvey Tettlebaum, Treasurer
Missouri Republican State Committee
Box 73, 507 E. High St.
Jefferson City, Missouri 65101

Re: MUR 948

Dear Mr. Tettlebaum:

The Commission has determined to take no further action against the Missouri Republican State Committee regarding the violation of 2 U.S.C. § 441b(a). Accordingly, we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagan at (202) 523-4060.

Sincerely,

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

William C. Oldaker
General Counsel



7 2 0 1 3 1 3 3 5 6 9

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Harvey Tettlebaum, Treasurer
Missouri Republican State Committee
Box 73, 507 E. High St.
Jefferson City, Missouri 65101

Re: MUR 948

Dear Mr. Tettlebaum:

The Commission has determined to take no further action against the Missouri Republican State Committee regarding the violation of 2 U.S.C. § 441b(a). Accordingly, we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagan at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

fl

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Missouri Republican State Committee)
Krey Packing Company) MUR 948
Monroe City Diecasting Company)
The Nooter Corporation)

CERTIFICATION

I, Marjorie E. Emmons, Secretary to the Federal Election Commission, do hereby certify, that on August 29, 1979, the Commission determined, by a vote of 5-0 to adopt the following recommendation contained in the General Counsel's Report dated August 25, 1979:

1. Take no further action against the Missouri Republican State Committee regarding the violation of 2 U.S.C. §441b(a).
2. Take no further action against the Krey Packing Company regarding the violation of 2 U.S.C. §441b(a).
3. Take no further action against the Monroe City Diecasting Company regarding the violation of 2 U.S.C. §441b(a).
4. Take no further action against the Nooter Corporation regarding violation of 2 U.S.C. §441b(a).
5. Close the file.
6. Send the letters attached to the above-named report.

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

Attest:

8-30-79
Date

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

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

7-27-79, 1141
7-27-79, 4:00

79010133570

August 27, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 948

Please have the attached General Counsel's Report
on MUR 948 distributed to the Commission on a 48 hour
turnaround basis.

Thank you.

7 2 0 1 0 1 3 3 5 7 1

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

Missouri Republican State Committee)

Krey Packing Company)

Monroe City Diecasting Company)

The Nooter Corporation)

79 AUG 27 MOR 9481

GENERAL COUNSEL'S REPORT

On May 23, 1979, the Commission found reason to believe that the Missouri Republican State Committee ("the Committee") violated 2 U.S.C. § 441b(a) by accepting contributions from three corporations. The Commission also found reason to believe that Monroe City Diecasting Company, Krey Packing Company and the Nooter Corporation violated 2 U.S.C. § 441b(a) by making contributions in connection with a federal election.

The Missouri Republican State Committee has refunded the corporate contributions totaling \$962.50 received during the 1976 elections. Copies of these checks are attached. (Attachments II/3, III/2, IV/2). The Committee now maintains two bank accounts which separate contributions allowable under State and Federal laws. They have informed their corporate contributors of the Act's requirements, advising them to designate checks to the appropriate fund.

The three corporate contributors submitted information regarding their transactions. The contributions occurred when the corporations purchased tickets to a Committee fundraising event.

An official of the Nooter Corporation stated that the corporation was not aware that the event benefited federal candidates. He noted that he has received the State Committee's refund check.

73010133572

The new owner of the Krey Packing Company has no direct knowledge of the circumstances, but contacted the former owner for clarification. Mr. John Krey III informed him that he did not know of the prohibition on corporate contributions.

Finally, the Monroe City Diecasting Company expressed regret that the contribution was made by corporate check, and had conferred with the Committee regarding a refund.

The Committee has refunded the total amount of corporate contributions and has established measures to avoid accepting prohibited funds in the future. Therefore, consistent with the Commission's policy when dealing with pre-August 1978 corporate contribution matters, we are recommending that the Commission take no further action in this case.

RECOMMENDATION

1. Take no further action against the Missouri Republican State Committee regarding the violation of 2 U.S.C. § 441b(a).
2. Take no further action against the Krey Packing Company regarding the violation of 2 U.S.C. § 441b(a).
3. Take no further action against the Monroe City Diecasting Company regarding the violation of 2 U.S.C. § 441b(a).
4. Take no further against the Nooter Corporation regarding violation of 2 U.S.C. § 441b(a).

7901015573

5. Close the file.
6. Send attached letters.

DATE: 8/25/19

William C. Oldaker
General Counsel

Attachments

4 letters

Attachment I Committee

Attachment II Krey

Attachment III Monroe City

Attachment IV Nooter

7 2 0 4 0 1 5 3 5 7 4



mur 948
Hagan
RECEIVED
FEDERAL ELECTION
COMMISSION

10673

'79 JUL 25 AM 11:50

STANLEY I. DALE
Chairman
ERNESTINE BECKMAN
Vice-Chairman
GILDA MANNING
Secretary
HARVEY TETTLEBAUM
Treasurer
ALFRED J. FLEISCHER
State Finance Chairman
JEWETT M. FULKERSON
National Committeeman
EYVON MENDENHALL
National Committeewoman

July 16, 1979

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

903212

Attention: Frances B. Hagan

RE: Audit Report of Federal Election Commission
Dated May 16, 1979

Dear Ms. Hagan:

Enclosed are copies of additional information pertaining to calendar year 1976 corporate contributions previously determined accepted in violation of Section 441b(a) of Title Two of the U. S. Code.

We are at this time able to supply you with a complete copy of the cancelled check payable to the Nooter Corporation. We are also enclosing copies of two reimbursement checks of corporate contributions which, as of Noon today, have not yet cleared our bank. We will forward the copies of the cancelled checks as soon as we receive them.

We are contacting the two corporations as to the reason for the delay in their presenting the checks for payment.

Very truly yours,

HARVEY M. TETTLEBAUM
Treasurer

HMT:vsd
Enclosures

Attachment I

Missouri
Republican
State Committee

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65101
AC 314-636-3146

25:25 92707 67

RECEIVED
FEDERAL ELECTION
COMMISSION



RECEIVED
FEDERAL ELECTION
COMMISSION

'79 JUL 25 AM 11:50

July 10, 1979

STANLEY X X X X X
Chairman
BURNING X X X X X
Vice-Chairman
X X X X X X X X X
Secretary
HARVEY TETTELBAUM
Treasurer
X X X X X X X X X X X
State Finance Chairman
JEWETT M. FULKERSON
National Committeeman
EYVON MENDENHALL
National Committeewoman

Mr. John Krey Stevens
Chairman
Krey Packing Company
3607 North Florissant
St. Louis, Missouri

Dear Mr. Stevens:

Enclosed please find check #1018, drawn by the Missouri Republican State Committee - Federal Fund, in the amount of \$212.50. This check represents a full reimbursement to the Krey Corporation for a corporate contribution our Committee accepted in 1976.

Under Federal Election Laws, political committees may not accept corporate contributions. Although funds received from Krey Corporation in 1976 were most assuredly not used to directly or indirectly influence the outcome of any federal election, our Committee unfortunately did not at that time segregate its funds. Thereby necessitating full compliance with Federal Election Laws in regard to all income and expenditures.

To remedy this situation for the purposes of future income, the M. R. S. C. has established two separate accounts -- one for receiving allowable federal contributions and another for receiving contributions governed by State Election Laws. As you may know, present State Election Law allows political committees to accept corporate and union contributions.

Contributions to the M. R. S. C. federal account must, of course, be allowable and specifically designated to our Federal Fund. Contributions to the M. R. S. C. state account, corporate or otherwise, should be simply made to the "Missouri Republican State Committee".



Missouri
Republican
State Committee

Attachment II p.1

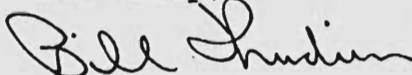
BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

7 2 0 1 0 1 3 3 5 7 6

Mr. Stevens
July 10, 1979
Page 2

Thanks for your cooperation in bringing this matter to what we hope and assume will be a satisfactory conclusion.

Sincerely,



William E. Thudium
Assistant to the Chairman
Republican State Committee

WET:vb

cc: Susanne Haessler, Audit Division
Federal Election Commission

RE: MUR 948, Frances B. Hagan,
Office of General Counsel
Federal Election Commission

Harvey Tettlebaum, Treasurer
M. R. S. C.
William Macon, Chairman
M. R. S. C.
John Ferrell, Accountant
M. R. S. C.

Attachment II p2

79040133577

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1018

PAY
TO THE
ORDER OF

KREY Packing Company

July 3 1977

80-306
865

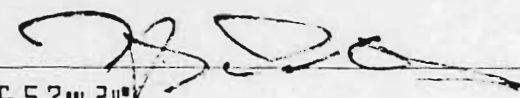
Two Hundred Twelve and 50/100

\$212.50

DOLLARS

 **united missouri bank**
of jefferson city,
Jefferson City, Missouri 65101

Refused



⑈00001018⑈ ⑆086503068⑆ ⑈00⑈657⑈2⑈

Att. II p. 3

8 2 9 5 5 1 0 1 0 6 2

KREY PACKING COMPANY

ESTABLISHED 1882

ST. LOUIS, MISSOURI 63107

JOHN KREY STEPHENS
Chairman and Chief Executive Officer

June 21, 1979

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

Attn: Frances B. Hagan

Re: MUR 948

Dear Ms. Hagan:

I have tried to check further into the subject matter of your letter of June 8, 1979, regarding the alleged Company contribution to the Missouri Republican Party in February, 1976, in the amount of \$212.50.

Krey Packing Company closed its St. Louis plant last year and sold off a substantial part of its assets to John Morrell & Co. and others. Mr. John Krey III, who handled this so-called contribution has gone into another business. The Company records are in storage and I have no personal knowledge of the transaction. Mr. Krey III advises that he has only a general and hazy recollection of buying some tickets for a public entertainment event featuring Glen Campbell. He assumes, but does not now recall, that it was sponsored by the Missouri Republican Committee, and must have not considered at the time that it was a contribution for political candidates for office. He said that he would have expected the person and organization soliciting the contribution to have advised him no corporate payment could be made, and recalls no cautionary advice to that effect. He does not know what became of the tickets. The Company has received no refund and has not requested any, but will do so if it is necessary to comply with the law.

Please let me know what further action, if any, you suggest we should take to clear our Company of any suspicion that it has violated provisions of the Federal Election Campaign Act of 1971.

Yours very truly,

Chairman of the Board



cc: William E. Thudium, Executive Director and
Harvey Tettlebaum, Treasurer
Missouri Republican State Committee

MEMBER
AMERICAN MEAT INSTITUTE

SELECTED MEAT PRODUCTS

Attach. II p.4

U. S. GOVERNMENT INSPECTED • ESTABLISHMENT NO. 192

79019133579



A

STANLEY I. DALE

Chairman

ERNESTINE BECKMAN

Vice-Chairman

GILDA MANNING

Secretary

HARVEY TETTLBAUM

Treasurer

HOWARD C. OHLENDORF

State Finance Chairman

JEWETT M. FULKERSON

National Committeeman

EYVON MENDENHALL

National Committeewoman

April 27, 1979

Mr. L. O. Kuhlman
Monroe City Diecasting Co.
135 Front St.
Monroe City, Mo. 63456

Dear Mr. Kuhlman:

Enclosed please find check #1015 drawn by the Republican State Committee - Federal Fund in the amount of \$100.00. This check, payable to the Monroe City Diecasting Corporation, represents a reimbursement by the State Committee for inadvertently accepting a \$100.00 contribution from said corporation in connection with our 1976 Glen Campbell Show ticket sales program.

Although under current Missouri Election Laws corporate & union political contributions may be accepted by political committees and candidates, Federal Election Laws do not allow such contributions. As a result the Missouri Republican State Committee opened separate bank accounts: one for accepting allowable contributions under State Law and another for allowable contributions in connection with Federal campaign activities. To our knowledge none of the funds raised as a result of ticket sales to the Glen Campbell Show in 1976 were used in connection with Federal campaign activities but we had not segregated our accounts at the time and therefore the Federal Election Commission held that contributions such as yours were subject to the constraints of Federal Election Laws.

In order to make a corporate contribution to the State Committee, checks should simply be made out to the Missouri Republican State Committee. Contributions to our Federal Account must of course be allowable and specifically designated for such account.

Thanks for your assistance in this matter.

Sincerely,

Bill Thudium

William E. Thudium
Asst. to the Chairman

Attachment III p.1



Missouri
Republican
State Committee

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1015

April 20 1979

80-306
865

PAY
TO THE
ORDER OF

Monroe City Diecasting Corporation

\$ 100.00

One hundred & 00/100

DOLLARS



united missouri bank
of jefferson city,
Jefferson City, Missouri 65101

Reimbursement

⑈00001015⑈ Ⓞ⑈086503068⑈

⑈00⑈657⑈2⑈

Note: As of JULY 16, 1979 THE ABOVE CHECK HAD NOT
CLEARED THE BANK.

Attachment III p. 2



KUHLMAN Die Casting Company, Inc.

164th AND MISSION ROAD, STANLEY, KANSAS 66223

PHONE: 913 - 681-2351

TWX: 1 910 - 749-6413



MONROE CITY Die Casting Co.

135 FRONT STREET, MONROE CITY, MISSOURI 63456

PHONE: 314 - 735-4567

TWX: 1 910 - 760-2811

June 15, 1979

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

902765

Dear Mr. Oldaker:

Re: MUR 948

We have received your letter of June 8, 1979 in regards
to a contribution to the Missouri Republican State Committee
in 1976.

We are enclosing a copy of a letter from the Missouri Republican
Committee dated December 21, 1978, with our reply to them on the
bottom of same letter.

We regret that the contribution was written on a corporation
check, and appreciate this matter being kept confidential.

We have been in contact with the Republican State Committee, and
they have told us our check will be returned in the near future.
Therefore we can consider the matter resolved.

Very truly yours,

Monroe City Diecasting Company

David E. Kuhlman
David E. Kuhlman
Vice President

DEK:kp

7 JUN 19 1979

RECEIVED
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION
JUN 19 1979

Attachment III p.3

DIE CASTING OF ZINC OR ALUMINUM ALLOYS



A.

STANLEY I. DALE

Chairman

ERNESTINE BECKMAN

Vice-Chairmen

GILDA MANNING

Secretary

HARVEY TETTLBAUM

Treasurer

HOWARD C. OHLENDORF

State Finance Chairman

JEWETT M. FULKERSON

National Committeemen

EYVON MENDENHALL

National Committeewomen

June 12, 1979

Mr. Robert J. Ryan
Nooter Corporation
1400 S. 3rd, Box 451
St. Louis, Mo. 63166

Dear Mr. Ryan:

Enclosed please find checks # 1016 & 1017 drawn by the Republican State Committee - Federal Fund in the amount of \$650.00. These checks, payable to the Nooter Corporation, represent a reimbursement by the State Committee for inadvertently accepting \$650.00 in contributions from said corporation in connection with our 1976 Glen Campbell Show ticket sales program.

Although under current Missouri Election Laws corporate and union political contributions may be accepted by political committees and candidates, Federal Election laws do not allow such contributions. As a result the Missouri Republican State Committee opened separate bank accounts: one for accepting allowable contributions under State Law and another for allowable contributions in connection with Federal campaign activities. To our knowledge none of the funds raised as a result of ticket sales to the Glen Campbell Show in 1976 were used in connection with Federal campaign activities but we had not segregated our accounts at the time and therefore the Federal Election Commission held that contributions such as yours were subject to the constraints of Federal Election Laws.

In order to make a corporate contribution to the State Committee, checks should simply be made out to the Missouri Republican State Committee. Contributions to our Federal Account must of course be allowable and specifically designated for such account.

Thanks for your assistance in this matter.

Sincerely,

Bill Thudium

William E. Thudium

Asst. to the Chairman


**Missouri
Republican
State Committee**

Attachment IV p. 1

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1016

JUNE 6 1979

80-306
865

PAY
TO THE
ORDER OF

Norton Corporation

\$ 600.00

Six hundred & 00/100

DOLLARS



Refund

[Signature]

⑈00001016⑈ ⑆086503068⑆

⑈00⑈657⑈2⑈

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1017

JUNE 12 1979

80-306
865

PAY
TO THE
ORDER OF

Norton Corporation

\$ 50.00

fifty & 00/100

DOLLARS



Refund

[Signature]

⑈00001017⑈ ⑆086503068⑆

⑈00⑈657⑈2⑈

Attachment IV p.2

7 9 0 1 0 5 3 5

Pay Manufacturers Bank & Trust Co
4-27 St. Louis, Mo., or order 4-27
NOOTER CORPORATION

Pay Manufacturers Bank & Trust Co
4-27 St. Louis, Mo., or order 4-27
NOOTER CORPORATION

JUN 3 1939
4-27
ST. LOUIS, MO.
4-27

JE 79 21
PAY ANY
BANK
0310-0004-6

Attachment IV p. 3

JUN 3 1939
4-27
ST. LOUIS, MO.
4-27

JE 79 21
PAY ANY
BANK
0310-0004-6

07108098
115879028

07108098
115879028

Hagan

10413

902833

NOOTER CORPORATION

1400 SOUTH THIRD STREET

SAINT LOUIS, MISSOURI

June 18, 1979

ROBERT H. HARPER
VICE PRESIDENT-ADMINISTRATION

MAILING ADDRESS:
POST OFFICE BOX 451
SAINT LOUIS, MISSOURI 63166

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

Reference: MUR 948

Dear Mr. Oldaker:

We are in receipt of your letter of June 8, 1979, suggesting that Nooter Corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended. The facts are that early in 1976, Nooter Corporation purchased from the Missouri Republican Finance Committee, at a cost of \$650.00, 100 tickets to an entertainment show featuring one Glen Campbell. Attending were then Governor Bond, Lt. Governor Phelps, and Attorney General Danforth, all of the State of Missouri. It was our understanding that this party did not, in any way, involve any campaign for Federal offices and that the purchase of such tickets was perfectly proper under both the State and Federal election laws.

In any event, the Missouri Republican State Committee has refunded to the corporation the moneys so paid. Photostatic copies of the checks, showing endorsement to the account of Nooter Corporation, are enclosed. Under the circumstances, we do not believe that any action should be taken against Nooter Corporation as we do not believe there was any violation of the Federal statute. If the Commission should feel that there was a violation, we respectfully submit that it was unknowingly and not deliberate and at best a technical violation.

We would prefer that any investigation of this matter remain confidential in accordance with the provisions of 2 U.S.C. 437g(a) (3)(B).

58:21d 22NOV 67

RECEIVED
JUN 20 1979
FEDERAL ELECTION COMMISSION

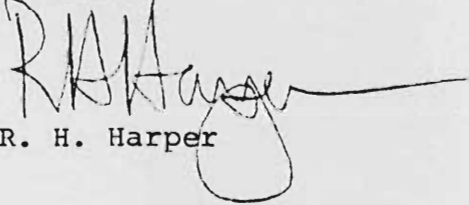
Attachment II p.4

Mr. W. C. Oldaker
Federal Election Commission -2-

June 18, 1979

If, for any reason, the Commission feels that further investigation is required, we would like to be represented by counsel. Letter from our counsel to this effect is enclosed in accordance with your request that counsel notify you.

Cordially


R. H. Harper

RHH:nj
Enc.

Attachment IV p. 5



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. John Krey Stephens
Krey Packing Company
Post Office Box 208, MPO
St. Louis, Missouri 63166

Re: MUR 948

Dear Mr. Stephens:

The Commission has determined to take no further action against the Krey Packing Company regarding the violation of 2 U.S.C. § 441b(a). Accordingly, we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagen at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

79010153588



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Harvey Tettlebaum, Treasurer
Missouri Republican State Committee
Box 73, 507 E. High St.
Jefferson City, Missouri 65101

Re: MUR 948

Dear Mr. Tettlebaum:

The Commission has determined to take no further action against the Missouri Republican State Committee regarding the violation of 2 U.S.C. § 441b(a). Accordingly, we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagan at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. R.H. Harper
Nooter Corporation
P.O. Box 451
St. Louis, Missouri 63166

Re: MUR 948

Dear Mr. Harper:

The Commission has determined to take no further action against the Nooter Corporation regarding the violation of 2 U.S.C. § 441b(a). Accordingly we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagen at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

7 9 0 4 0 1 5 3 5 9 0



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David E. Kuhlman, Vice President
Monroe City Diecasting Company
135 Front Street
Monroe City, Missouri 63456

Re: MUR 948

Dear Mr. Kuhlman:

The Commission has determined to take no further action against the Monroe City Diecasting Company regarding the violation of 2 U.S.C. § 441b(a). Accordingly, we are closing the file in this matter.

If you have any questions, please contact Frances B. Hagan at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel





948 10673
RECEIVED
FEDERAL ELECTION
COMMISSION

'79 JUL 25 AM 11:50

STANLEY I. DALE
Chairman
ERNESTINE BECKMAN
Vice Chairman
GILDA MANNING
Secretary
HARVEY TETTLEBAUM
Treasurer
ALFRED J. FLEISCHER
State Finance Chairman
JEWETT M. FULKERSON
National Committeeman
EYVON MENDENHALL
National Committeewoman

July 16, 1979

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

90322

Attention: Frances B. Hagan

RE: Audit Report of Federal Election Commission
Dated May 16, 1979


Dear Ms. Hagan:

Enclosed are copies of additional information pertaining to calendar year 1976 corporate contributions previously determined accepted in violation of Section 441b(a) of Title Two of the U. S. Code.

We are at this time able to supply you with a complete copy of the cancelled check payable to the Nooter Corporation. We are also enclosing copies of two reimbursement checks of corporate contributions which, as of Noon today, have not yet cleared our bank. We will forward the copies of the cancelled checks as soon as we receive them.

We are contacting the two corporations as to the reason for the delay in their presenting the checks for payment.

Very truly yours,

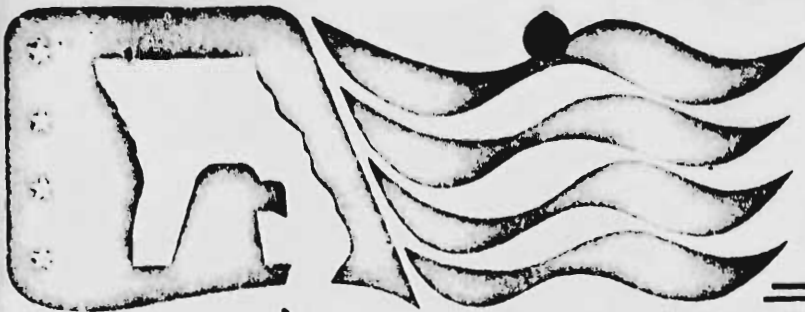

HARVEY M. TETTLEBAUM
Treasurer

HMT:vsd
Enclosures



Missouri
Republican
State Committee

27:24 52707 67
BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65101
AC 314-636-3146



RECEIVED
FEDERAL ELECTION
COMMISSION

'79 JUL 25 AM 11:50

July 10, 1979

STANLEY X X X X X
Chairman

ROBERT X X X X X
Vice-Chairman

WILLIAM X X X X X
Secretary

HARVEY TETTELBAUM
Treasurer

JOHN X X X X X
State Finance Chairman

JEWETT M. FULKERSON
National Committeeman

EYVON MENDERHALL
National Committeewoman

Mr. John Krey Stevens
Chairman
Krey Packing Company
3607 North Florissant
St. Louis, Missouri

Dear Mr. Stevens:

Enclosed please find check #1018, drawn by the Missouri Republican State Committee - Federal Fund, in the amount of \$212.50. This check represents a full reimbursement to the Krey Corporation for a corporate contribution our Committee accepted in 1976.

Under Federal Election Laws, political committees may not accept corporate contributions. Although funds received from Krey Corporation in 1976 were most assuredly not used to directly or indirectly influence the outcome of any federal election, our Committee unfortunately did not at that time segregate its funds. Thereby necessitating full compliance with Federal Election Laws in regard to all income and expenditures.

To remedy this situation for the purposes of future income, the M. R. S. C. has established two separate accounts -- one for receiving allowable federal contributions and another for receiving contributions governed by State Election Laws. As you may know, present State Election Law allows political committees to accept corporate and union contributions.

Contributions to the M. R. S. C. federal account must, of course, be allowable and specifically designated to our Federal Fund. Contributions to the M. R. S. C. state account, corporate or otherwise, should be simply made to the "Missouri Republican State Committee".



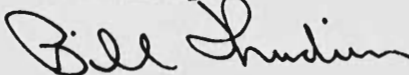
Missouri
Republican
State Committee

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

Mr. Stevens
July 10, 1979
Page 2

Thanks for your cooperation in bringing this matter to what we hope and assume will be a satisfactory conclusion.

Sincerely,



William E. Thudium
Assistant to the Chairman
Republican State Committee

WET:vb

cc: Susanne Haessler, Audit Division
Federal Election Commission

RE: MUR 948, Frances B. Hagan,
Office of General Counsel
Federal Election Commission

Harvey Tettlebaum, Treasurer
M. R. S. C.
William Macon, Chairman
M. R. S. C.
John Ferrell, Accountant
M. R. S. C.

7 9 0 1 0 1 3 3 5 9 4

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1018

PAY
TO THE
ORDER OF

for [unclear]

1971

80-306
865

DOLLARS



⑈00001018⑈ ⑆085503068⑆

⑈00⑈657⑈2⑈

[Handwritten signature]

65102

565151610002

STANLEY I. DALE

Chairman

ERNESTINE BECKMAN

Vice-Chairman

GILDA MANNING

Secretary

HARVEY TETLEBAUM

Treasurer

HOWARD C. GILGENDORF

State Finance Chairman

JEFFREY M. FULKERSON

National Committeewoman

EYVON MEADENHALL

National Committeewoman

December 21, 1978

Mr. John F. Krey, III
c/o Krey Packing Company
P. O. Box 208, MPO
St. Louis, Missouri 63166

Dear Mr. Krey.

The Missouri Republican State Committee is presently being audited by the Federal Elections Commission and they have questioned a particular contribution made during 1976 which they think may have been corporate. In the event they are correct the State Committee will be required to reimburse the Company for a like amount.

According to our records, on February 10, 1976 our Committee Finance Office received a check from you in the amount of \$212.50 for which tickets to the February 26, 1976 Glen Campbell Event were requested (copy of letter enclosed). As you will recall this was a fundraising event sponsored by the Missouri Republican State Committee. If possible, we would appreciate your checking the Company records regarding any such transaction during that period of time and letting us know what the circumstances were in a written statement to this office.

We would appreciate a reply at your earliest possible convenience.

Sincerely,

William E. Thudium
Executive Director



Missouri
Republican
State Committee

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

72010133596

KREY PACKING COMPANY

ESTABLISHED 1882

ST. LOUIS, MISSOURI 63107

JOHN KREY STEPHENS
Chairman and Chief Executive Officer

June 21, 1979

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

Attn: Frances B. Hagan

Re: MUR 948

Dear Ms. Hagan:

I have tried to check further into the subject matter of your letter of June 8, 1979, regarding the alleged Company contribution to the Missouri Republican Party in February, 1976, in the amount of \$212.50.

Krey Packing Company closed its St. Louis plant last year and sold off a substantial part of its assets to John Morrell & Co. and others. Mr. John Krey III, who handled this so-called contribution has gone into another business. The Company records are in storage and I have no personal knowledge of the transaction. Mr. Krey III advises that he has only a general and hazy recollection of buying some tickets for a public entertainment event featuring Glen Campbell. He assumes, but does not now recall, that it was sponsored by the Missouri Republican Committee, and must have not considered at the time that it was a contribution for political candidates for office. He said that he would have expected the person and organization soliciting the contribution to have advised him no corporate payment could be made, and recalls no cautionary advice to that effect. He does not know what became of the tickets. The Company has received no refund and has not requested any, but will do so if it is necessary to comply with the law.

Please let me know what further action, if any, you suggest we should take to clear our Company of any suspicion that it has violated provisions of the Federal Election Campaign Act of 1971.

Yours very truly,

Chairman of the Board



cc: William E. Thudium, Executive Director and
Harvey Tettlebaum, Treasurer
Missouri Republican State Committee

MEMBER
AMERICAN MEAT INSTITUTE

SELECTED MEAT PRODUCTS

79010133597



STANLEY I. DALE
Chairman

ERNESTINE BECKMAN
Vice-Chairman

GILDA MANNING
Secretary

HARVEY TETTELBAUM
Treasurer

HOWARD C. OHLENDORF
State Finance Chairman

JEWETT M. FULKERSON
National Committeeman

EYVON MENDENHALL
National Committeewoman

June 12, 1979

Mr. Robert J. Ryan
Nooter Corporation
1400 S. 3rd, Box 451
St. Louis, Mo. 63166

Dear Mr. Ryan:

Enclosed please find checks # 1016 & 1017 drawn by the Republican State Committee - Federal Fund in the amount of \$650.00. These checks, payable to the Nooter Corporation, represent a reimbursement by the State Committee for inadvertently accepting \$650.00 in contributions from said corporation in connection with our 1976 Glen Campbell Show ticket sales program.

Although under current Missouri Election Laws corporate and union political contributions may be accepted by political committees and candidates, Federal Election laws do not allow such contributions. As a result the Missouri Republican State Committee opened separate bank accounts: one for accepting allowable contributions under State Law and another for allowable contributions in connection with Federal campaign activities. To our knowledge none of the funds raised as a result of ticket sales to the Glen Campbell Show in 1976 were used in connection with Federal campaign activities but we had not segregated our accounts at the time and therefore the Federal Election Commission held that contributions such as yours were subject to the constraints of Federal Election Laws.

In order to make a corporate contribution to the State Committee, checks should simply be made out to the Missouri Republican State Committee. Contributions to our Federal Account must of course be allowable and specifically designated for such account.

Thanks for your assistance in this matter.

Sincerely,

Bill Thudium

William E. Thudium
Asst. to the Chairman



**Missouri
Republican
State Committee**

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1016

JUNE 6 1979

80-306
865

PAY
TO THE
ORDER OF

Norton Corporation

\$ 600.00

Six hundred & 00/100

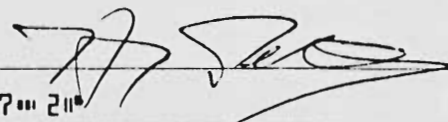
DOLLARS

 **united missouri bank**
of jefferson city,
Jefferson City, Missouri 65101

Refund

⑈00001016⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈



REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1017

JUNE 12 1979

80-306
865

PAY
TO THE
ORDER OF

Norton Corporation

\$ 50.00

Fifty & 00/100

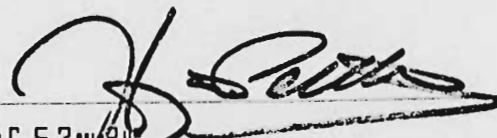
DOLLARS

 **united missouri bank**
of jefferson city,
Jefferson City, Missouri 65101

Refund

⑈00001017⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈



72040153592

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Pay Manufacturers Bank & Trust Co
4-27 St. Louis, Mo., or order 4-27
NOOTER CORPORATION

Pay Manufacturers Bank & Trust Co
4-27 St. Louis, Mo., or order 4-27
NOOTER CORPORATION

JUN 7 1939

4-27
ST. LOUIS, MO.
G. TRUST CO.

2 0 0 0 0

JE 78 21
FBI ST. L.
0910-0004-5
PAYANT
BANK

JUN 7 1939

4-27
ST. LOUIS, MO.
G. TRUST CO.

2 0 0 0 0

JE 78 21
FBI ST. L.
0910-0004-5
PAYANT
BANK

NOOTER CORPORATION
ST. LOUIS, MO.

NOOTER CORPORATION
ST. LOUIS, MO.



STANLEY I. DALE
Chairman

ERNESTINE BECKMAN
Vice-Chairman

GILDA MANNING
Secretary

HARVEY TETTELBAUM
Treasurer

HOWARD C. OHLENDORF
State Finance Chairman

JEWETT M. FULKERSON
National Committeeman

EYVON MENDENHALL
National Committeewoman

April 27, 1979

Mr. L. O. Kuhlman
Monroe City Diecasting Co.
135 Front St.
Monroe City, Mo. 63456

Dear Mr. Kuhlman:

Enclosed please find check #1015 drawn by the Republican State Committee - Federal Fund in the amount of \$100.00. This check, payable to the Monroe City Diecasting Corporation, represents a reimbursement by the State Committee for inadvertently accepting a \$100.00 contribution from said corporation in connection with our 1976 Glen Campbell Show ticket sales program.

Although under current Missouri Election Laws corporate & union political contributions may be accepted by political committees and candidates, Federal Election Laws do not allow such contributions. As a result the Missouri Republican State Committee opened separate bank accounts: one for accepting allowable contributions under State Law and another for allowable contributions in connection with Federal campaign activities. To our knowledge none of the funds raised as a result of ticket sales to the Glen Campbell Show in 1976 were used in connection with Federal campaign activities but we had not segregated our accounts at the time and therefore the Federal Election Commission held that contributions such as yours were subject to the constraints of Federal Election Laws.

In order to make a corporate contribution to the State Committee, checks should simply be made out to the Missouri Republican State Committee. Contributions to our Federal Account must of course be allowable and specifically designated for such account.

Thanks for your assistance in this matter.

Sincerely,

Bill Thudium

William E. Thudium
Asst. to the Chairman

**Missouri
Republican
State Committee**

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT

P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1015

April 20 1979

80-306
865

PAY
TO THE
ORDER OF

Monroe City Diecasting Corporation


\$ 100.00

One hundred & 00/100

DOLLARS

 united missouri bank
of jefferson city,
Jefferson City, Missouri 65101

Reimbursement



⑈00001015⑈ ⑆086503068⑆

⑈00⑈657⑈2⑈

Note: As of JULY 16, 1979 THE ABOVE CHECK HAD NOT
CLEARED THE BANK.

7 2 7 0 0 1 5 3 6 0 4



STANLEY I. DALE
Chairman

ERNESTINE BECKMAN
Vice Chairman

GILDA MANNING
Secretary

HARVEY TETTLBAUM
Treasurer

HOWARD C. OHLENDORF
State Finance Chairman

JEWETT M. FULKERSON
National Committeemen

EYVON MENDENHALL
National Committeewoman

December 21, 1978

Mr. David Kuhlman
Monroe City Diecasting Co.
135 Front Street
Monroe City, Missouri 63456

Dear Mr. Kuhlman:

The Missouri Republican State Committee is presently being audited by the Federal Elections Commission. During an "exit session" the auditors questioned a particular contribution which they think may have been corporate. In the event they are correct the State Committee will be required to reimburse the Company for a like amount.

According to our records, our Committee received during 1976 a check in the amount of \$100.00 for which tickets were purchased to our February 27, 1976 Glen Campbell Show in Kansas City. We need now to determine if that check was drawn on a company account or if it was personal. We would appreciate your checking into this and letting this office know of the correct circumstances in a written statement. Please reply as soon as possible.

Sincerely,

William E. Thudium
Executive Director

January 11, 1979

In reply to your above request, the check was from the corporation of Kuhlman Diecasting Company.

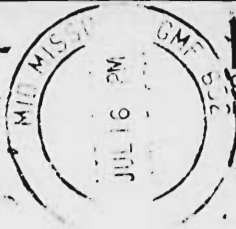
L. O. Kuhlman



Missouri
Republican
State Committee

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

7 9 0 1 0 1 3 3 6 0 3



05:11 AM 52 TOP 6L

**Missouri
Republican
State Committee**

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65101

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

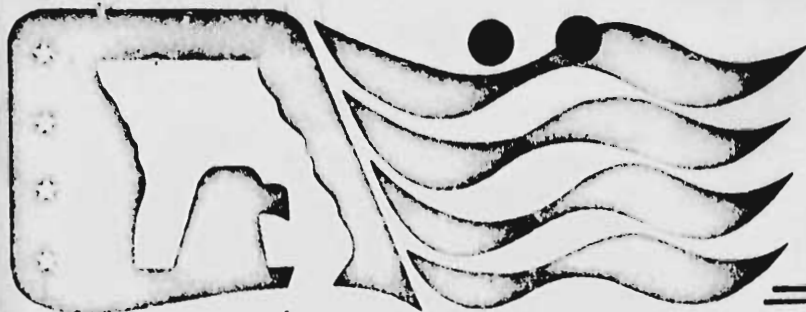
ACC# 10569

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 JUL 16 AM 11:50

19 JUL 16 P 4:01

GEN



STANLEY D. DAVIS
Chairman
BYRON D. DAVIS
Vice-Chairman
J. R. DAVIS
Secretary
HARVEY TETTERBAUM
Treasurer
J. R. DAVIS
State Finance Chairman
JEWETT M. FULKERSON
National Committeeman
EYVON MENDENHALL
National Committeewoman

July 10, 1979

903070

Mr. John Krey Stevens
Chairman
Krey Packing Company
3607 North Florissant
St. Louis, Missouri

Dear Mr. Stevens:

Enclosed please find check #1018, drawn by the Missouri Republican State Committee - Federal Fund, in the amount of \$212.50. This check represents a full reimbursement to the Krey Corporation for a corporate contribution our Committee accepted in 1976.

Under Federal Election Laws, political committees may not accept corporate contributions. Although funds received from Krey Corporation in 1976 were most assuredly not used to directly or indirectly influence the outcome of any federal election, our Committee unfortunately did not at that time segregate its funds. Thereby necessitating full compliance with Federal Election Laws in regard to all income and expenditures.

To remedy this situation for the purposes of future income, the M. R. S. C. has established two separate accounts -- one for receiving allowable federal contributions and another for receiving contributions governed by State Election Laws. As you may know, present State Election Law allows political committees to accept corporate and union contributions.

Contributions to the M. R. S. C. federal account must, of course, be allowable and specifically designated to our Federal Fund. Contributions to the M. R. S. C. state account, corporate or otherwise, should be simply made to the "Missouri Republican State Committee".

Missouri
Republican
State Committee

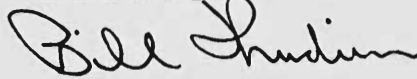
BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

7 2 2 1 0 3 3 6 0 5

Mr. Stevens
July 10, 1979
Page 2

Thanks for your cooperation in bringing this matter to what we hope and assume will be a satisfactory conclusion.

Sincerely,



William E. Thudium
Assistant to the Chairman
Republican State Committee

WET:vb

cc: Susanne Haessler, Audit Division
Federal Election Commission

RE: MUR 948, Frances B. Hagan,
Office of General Counsel
Federal Election Commission

Harvey Tettlebaum, Treasurer
M. R. S. C.
William Macon, Chairman
M. R. S. C.
John Ferrell, Accountant
M. R. S. C.

7 3 3 6 0 6

79040153607

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1018

80-306
865

July 3 1977

\$212.50

DOLLARS

PAY
TO THE
ORDER OF

For: *Reed P. Anderson*
Jefferson City, MO.



Handwritten signature

⑆00001018⑆ Ⓞ ⑆086503068⑆

⑆00m657m2⑆

Pay Manufacturers Bank & Trust Co
4-27 St. Louis, Mo., or order 4-27
NOOTER CORPORATION

Pay Manufacturers Bank & Trust Co
4-27 St. Louis, Mo., or order 4-27
NOOTER CORPORATION

7 7 0 1 0 1 3 6 0 3

JUN 2 1969

4-27
ST. LOUIS, MO.
4-27

2 0 0 0 0

JE 79 21
FBI ST. LOUIS
0810-0004-5

JUN 2 1969

4-27
ST. LOUIS, MO.
4-27

2 0 0 0 0

JE 79 21
FBI ST. LOUIS
0810-0004-5

0810-0004-5
FBI ST. LOUIS



Frances B. Hagan
Office of General Counsel
Federal Election Commission
1325 K Street, N W
Washington, D. C. 20463

RE: MUR 948

MISSOURI
**Missouri
Republican
State Committee**

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: JULY 2, 1979
SUBJECT: MUR 948 - Interim Investigative Report
dated 6-28-79. Received in OCS
6-29-79, 7:41

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 2:00, Friday, June 29, 1979.

There were no objections to the Interim Investigative Report at the time of the deadline.

7 2 0 1 9 1 3 1 0



FEDERAL ELECTION COMMISSION

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

79 JUL 2 12:53

DATE AND TIME OF TRANSMITTAL 6-29-79, ^{2:00}~~11:00~~

Commissioner FRIEDERSDORF, AIKENS, TIERNAN, McGARRY, THOMSON, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: JULY 2, 1979 - ^{2:00}~~11:00~~

MUR No. 708 - Interim Investigative Report dated 6-28-79

() I object to the recommendation in the attached report.

COMMENTS:

Why taking so long
with this investigation

Date

July 2, 1979

Signature

Max L. Friedersdorf

OBJECTIONS, SIGNED AND DATED, MUST BE RECEIVED IN THE COMMISSION SECRETARY'S OFFICE NO LATER THAN THE DATE AND TIME SHOWN ABOVE OR THE MATTER WILL BE DEEMED APPROVED. PLEASE RETURN ALL PAPERS TO THE OFFICE OF THE SECRETARY TO THE COMMISSION.



June 28, 1979

MEMORANDUM TO: :Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 948

Please have the attached Interim Invest Repprt
on MUR 948 distributed to the Commission.

Thank you.

79010153612

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSIONER
JUN 29 1979

29 JUN 29 A 7: 41

In the Matter of)

Missouri Republican State Committee)
Monroe City Diecasting Company)
Krey Packing Company)
Nooter Corporation)

MUR 948

INTERIM INVESTIGATIVE REPORT

On May 23, 1979, the Commission found reason to believe that violations of 2 U.S.C. § 441b(a) apparently occurred when the Missouri Republican State Committee accepted corporate contributions made by three corporations during the 1976 elections.

Each respondent has contacted the Office of General Counsel regarding efforts to comply with the Act. When their statements are received, we will offer additional recommendations for the Commission's consideration.

Date

6/28/79

William C. Oldaker
General Counsel

79010153613

600#
10445

KREY PACKING COMPANY

ESTABLISHED 1882

ST. LOUIS, MISSOURI 63107

JOHN KREY STEPHENS
Chairman and Chief Executive Officer

June 21, 1979

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

302000

Attn: Frances B. Hagan

Re: MUR 948

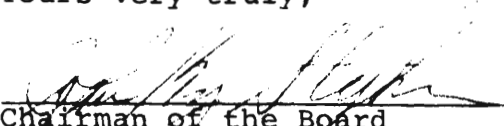
Dear Ms. Hagan:

I have tried to check further into the subject matter of your letter of June 8, 1979, regarding the alleged Company contribution to the Missouri Republican Party in February, 1976, in the amount of \$212.50.

Krey Packing Company closed its St. Louis plant last year and sold off a substantial part of its assets to John Morrell & Co. and others. Mr. John Krey III, who handled this so-called contribution has gone into another business. The Company records are in storage and I have no personal knowledge of the transaction. Mr. Krey III advises that he has only a general and hazy recollection of buying some tickets for a public entertainment event featuring Glen Campbell. He assumes, but does not now recall, that it was sponsored by the Missouri Republican Committee, and must have not considered at the time that it was a contribution for political candidates for office. He said that he would have expected the person and organization soliciting the contribution to have advised him no corporate payment could be made, and recalls no cautionary advice to that effect. He does not know what became of the tickets. The Company has received no refund and has not requested any, but will do so if it is necessary to comply with the law.

Please let me know what further action, if any, you suggest we should take to clear our Company of any suspicion that it has violated provisions of the Federal Election Campaign Act of 1971.

Yours very truly,


Chairman of the Board

KREY

cc: William E. Thudium, Executive Director and
Harvey Tettlebaum, Treasurer
Missouri Republican State Committee

SELECTED MEAT PRODUCTS

MEMBER
AMERICAN MEAT INSTITUTE

7 3 0 1 0 1 5 3 6 1 4

EXECUTIVE OFFICE

KREY PACKING COMPANY

3607 NO. FLORISSANT AVE.

ST. LOUIS, MO. 63107

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

Attn: Frances B. Hagan

611 PM
10413
902833

NOOTER CORPORATION

1400 SOUTH THIRD STREET
SAINT LOUIS, MISSOURI

June 18 1979
73 JUN

ROBERT H. HARPER
VICE PRESIDENT-ADMINISTRATION

MAILING ADDRESS:
POST OFFICE BOX 451
SAINT LOUIS, MISSOURI 63166

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

Reference: MUR 948

Dear Mr. Oldaker:

7 9 0 1 0 1 5 3 6 1 3
We are in receipt of your letter of June 8, 1979, suggesting that Nooter Corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended. The facts are that early in 1976, Nooter Corporation purchased from the Missouri Republican Finance Committee, at a cost of \$650.00, 100 tickets to an entertainment show featuring one Glen Campbell. Attending were then Governor Bond, Lt. Governor Phelps, and Attorney General Danforth, all of the State of Missouri. It was our understanding that this party did not, in any way, involve any campaign for Federal offices and that the purchase of such tickets was perfectly proper under both the State and Federal election laws.

In any event, the Missouri Republican State Committee has refunded to the corporation the moneys so paid. Photostatic copies of the checks, showing endorsement to the account of Nooter Corporation, are enclosed. Under the circumstances, we do not believe that any action should be taken against Nooter Corporation as we do not believe there was any violation of the Federal statute. If the Commission should feel that there was a violation, we respectfully submit that it was unknowingly and not deliberate and at best a technical violation.

We would prefer that any investigation of this matter remain confidential in accordance with the provisions of 2 U.S.C. 437g(a) (3)(B).

56:21d 22 JUN 82

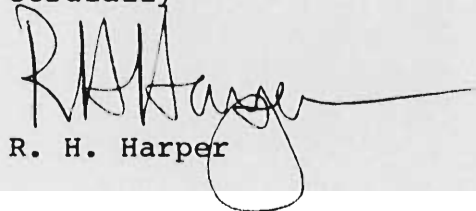
RECEIVED
JUN 22 1979
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

Mr. W. C. Oldaker
Federal Election Commission -2-

June 18, 1979

If, for any reason, the Commission feels that further investigation is required, we would like to be represented by counsel. Letter from our counsel to this effect is enclosed in accordance with your request that counsel notify you.

Cordially


R. H. Harper

RHH:nj
Enc.

73310133517

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1016

PAY
TO THE
ORDER OF

Nooter Corporation

JUNE 6 1979

80-306
865

\$600.00

Six hundred & $\frac{00}{100}$

DOLLARS



united missouri bank
of jefferson city,
Jefferson City, Missouri 65101

Refund

⑈00001016⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1017

PAY
TO THE
ORDER OF

Nooter Corporation

JUNE 12 1979

80-306
865

\$50.00

fifty & $\frac{00}{100}$

DOLLARS



united missouri bank
of jefferson city,
Jefferson City, Missouri 65101

Refund

⑈00001017⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈

LEWIS, RICE, TUCKER, ALLEN AND CHUBB
ATTORNEYS AT LAW
SUITE 1400 RAILWAY EXCHANGE BUILDING
611 OLIVE STREET
ST. LOUIS, MISSOURI 63101
314/231-5833

PHILIP A. MAXEINER

June 18, 1979

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

Re: MUR 948

Gentlemen:

We are counsel for Nooter Corporation, a Missouri corporation, with principal offices in the City of St. Louis. We are advised that a question has arisen whether they may inadvertently have violated certain provisions of the Federal Election Campaign Act of 1971. Our preliminary investigation leads us to the conclusion that there probably was no violation and we would hope that their response to you would result in no further action being taken. However, in the event the Commission does not agree, the corporation has requested that our firm represent them in this matter.

Very truly yours,

LEWIS, RICE, TUCKER, ALLEN AND CHUBB

By

Philip A. Maxeiner

PAM/md

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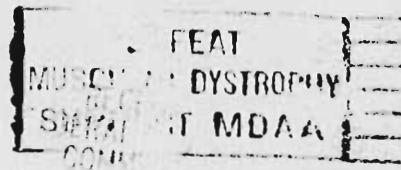
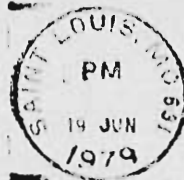
HOOTER CORPORATION

Post Office Box 451 • Saint Louis, Missouri 63166

CERTIFIED MAIL

No. 982-513

RETURN RECEIPT REQUESTED



UN 22 1 12 04

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



KUHLMAN Die Casting Company, Inc.

164th AND MISSION ROAD, STANLEY, KANSAS 66223

PHONE: 913 - 681-2351

TWX: 1 910 - 749-6413

MONROE CITY Die Casting Co.

135 FRONT STREET, MONROE CITY, MISSOURI 63456

PHONE: 314 - 735-4567

TWX: 1 910 - 760-2811

June 15, 1979

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

902765

Dear Mr. Oldaker:

Re: MUR 948

We have recieved your letter of June 8, 1979 in regards
to a contribution to the Missouri Republican State Committee
in 1976.

We are enclosing a copy of a letter from the Missouri Republican
Committee dated December 21, 1978, with our reply to them on the
bottom of same letter.

We regret that the contribution was written on a corporation
check, and appreciate this matter being kept confidential.

We have been in contact with the Republican State Committee, and
they have told us our check will be returned in the near future.
Therefore we can consider the matter resolved.

Very truly yours,

Monroe City Diecasting Company

David E. Kuhlman
David E. Kuhlman
Vice President

DEK:kp

19 JUN 19 3:47

GENERAL COUNSEL

OFFICE OF THE

RECEIVED

DIE CASTING OF ZINC OR ALUMINUM ALLOYS



STANLEY I. DALE
Chairman

ERNESTINE BECKMAN
Vice-Chairman

GILDA MANNING
Secretary

HARVEY TETTELBAUM
Treasurer

HOWARD C. OHLENDORF
State Finance Chairman

JEWETT M. FULKERSON
National Committeeman

EYVON MENDENHALL
National Committeewoman

December 21, 1978

Mr. David Kuhlman
Monroe City Diecasting Co.
125 Front Street
Monroe City, Missouri 63456

Dear Mr. Kuhlman:

The Missouri Republican State Committee is presently being audited by the Federal Elections Commission. During an "exit session" the auditors questioned a particular contribution which they think may have been corporate. In the event they are correct the State Committee will be required to reimburse the Company for a like amount.

According to our records, our Committee received during 1976 a check in the amount of \$100.00 for which tickets were purchased to our February 27, 1976 Glen Campbell Show in Kansas City. We need now to determine if that check was drawn on a company account or if it was personal. We would appreciate your checking into this and letting this office know of the correct circumstances in a written statement. Please reply as soon as possible.

Sincerely,

William E. Thudium
Executive Director

January 11, 1979

In reply to your above request, the check was from the corporation of Kuhlman Diecasting Company.

L. O. Kuhlman



Missouri
Republican
State Committee

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

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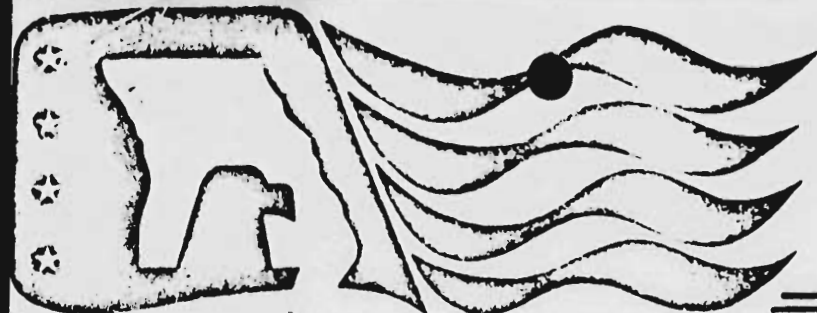
MONROE CITY Diecasting Co.

135 FRONT STREET, MONROE CITY, MO 63456



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

7 0 0 1 0 1 3 3 6



103-3

RE: MUR 948

April 27, 1979

902780

Mr. L. O. Kuhlman
Monroe City Diecasting Co.
135 Front St.
Monroe City, Mo. 63456

Dear Mr. Kuhlman:

Enclosed please find check #1015 drawn by the Republican State Committee - Federal Fund in the amount of \$100.00. This check, payable to the Monroe City Diecasting Corporation, represents a reimbursement by the State Committee for inadvertently accepting a \$100.00 contribution from said corporation in connection with our 1976 Glen Campbell Show ticket sales program.

Although under current Missouri Election Laws corporate & union political contributions may be accepted by political committees and candidates, Federal Election Laws do not allow such contributions. As a result the Missouri Republican State Committee opened separate bank accounts: one for accepting allowable contributions under State Law and another for allowable contributions in connection with Federal campaign activities. To our knowledge none of the funds raised as a result of ticket sales to the Glen Campbell Show in 1976 were used in connection with Federal campaign activities but we had not segregated our accounts at the time and therefore the Federal Election Commission held that contributions such as yours were subject to the constraints of Federal Election Laws.

In order to make a corporate contribution to the State Committee, checks should simply be made out to the Missouri Republican State Committee. Contributions to our Federal Account must of course be allowable and specifically designated for such account.

Thanks for your assistance in this matter.

Sincerely,
Bill Thudium
William E. Thudium
Asst. to the Chairman

- STANLEY I. DALE
Chairman
- ERNESTINE BECKMAN
Vice Chairman
- GILDA MANNING
Secretary
- HARVEY TETLEBAUM
Treasurer
- HOWARD C. CHLENDORF
State Finance Chairman
- JEWETT M. FULKERSON
National Committeewoman
- EYVON MENDENHALL
National Committeewoman

72010153624


**Missouri
Republican
State Committee**

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT

P. O. BOX 73 314-630-3146

JEFFERSON CITY, MO. 65102

1015

April 20 1979

80-306
865

PAY
TO THE
ORDER OF

MONROE City Diecasting Corporation

\$100.00

One hundred & 00/100

DOLLARS



united missouri bank
of jefferson city,

Jefferson City, Missouri 65101

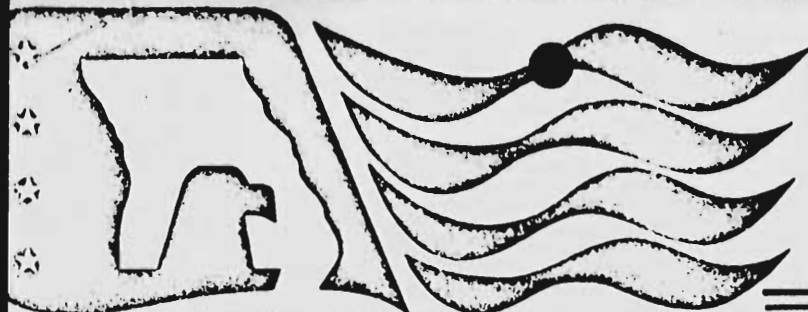
[Signature]

Reimbursement

⑈00001015⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈

77710155235



RE: MUR 948

STANLEY I. DALE
Chairman

ERNESTINE BECKMAN
Vice-Chairman

GILDA MANNING
Secretary

HARVEY TETTLBAUM
Treasurer

HOWARD C. OHLENDORF
State Finance Chairman

JEWETT M. FULKERSON
National Committeeman

EYVON MENDENHALL
National Committeewoman

June 12, 1979

Mr. Robert J. Ryan
Nooter Corporation
1400 S. 3rd, Box 451
St. Louis, Mo. 63166

Dear Mr. Ryan:

Enclosed please find checks # 1016 & 1017 drawn by the Republican State Committee - Federal Fund in the amount of \$650.00. These checks, payable to the Nooter Corporation, represent a reimbursement by the State Committee for inadvertently accepting \$650.00 in contributions from said corporation in connection with our 1976 Glen Campbell Show ticket sales program.

Although under current Missouri Election Laws corporate and union political contributions may be accepted by political committees and candidates, Federal Election laws do not allow such contributions. As a result the Missouri Republican State Committee opened separate bank accounts: one for accepting allowable contributions under State Law and another for allowable contributions in connection with Federal campaign activities. To our knowledge none of the funds raised as a result of ticket sales to the Glen Campbell Show in 1976 were used in connection with Federal campaign activities but we had not segregated our accounts at the time and therefore the Federal Election Commission held that contributions such as yours were subject to the constraints of Federal Election Laws.

In order to make a corporate contribution to the State Committee, checks should simply be made out to the Missouri Republican State Committee. Contributions to our Federal Account must of course be allowable and specifically designated for such account.

Thanks for your assistance in this matter.

Sincerely,

Bill Thudium

William E. Thudium
Asst. to the Chairman

**Missouri
Republican
State Committee**

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-836-3140
JEFFERSON CITY, MO. 65102

1016

PAY
TO THE
ORDER OF

Norton Corporation

JUNE 6 1979

80-306
865

\$400.00

Six hundred & $\frac{00}{100}$

DOLLARS



united missouri bank
of jefferson city,
Jefferson City, Missouri 65101

Refund

⑈00001016⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-836-3140
JEFFERSON CITY, MO. 65102

1017

PAY
TO THE
ORDER OF

Norton Corporation

JUNE 12 1979

80-306
865

\$50.00

fifty & $\frac{00}{100}$

DOLLARS



united missouri bank
of jefferson city,
Jefferson City, Missouri 65101

Refund

⑈00001017⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈

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FEDERAL ELECTION
COMMISSION

79 JUN 15 PM 12 45

STANLEY I. DALE

Chairman

ERNESTINE BECKMAN

Vice-Chairman

GILDA MANNING

Secretary

HARVEY TETTELBAUM

Treasurer

HOWARD C. OHLENDORF

State Finance Chairman

JEWETT M. FULKERSON

National Committeeman

EYVON MENDENHALL

National Committeewoman

June 12, 1979

Mr. Robert J. Ryan
Nooter Corporation
1400 S. 3rd, Box 451
St. Louis, Mo. 63166

Dear Mr. Ryan:

Enclosed please find checks # 1016 & 1017 drawn by the Republican State Committee - Federal Fund in the amount of \$650.00. These checks, payable to the Nooter Corporation, represent a reimbursement by the State Committee for inadvertently accepting \$650.00 in contributions from said corporation in connection with our 1976 Glen Campbell Show ticket sales program.

Although under current Missouri Election Laws corporate and union political contributions may be accepted by political committees and candidates, Federal Election laws do not allow such contributions. As a result the Missouri Republican State Committee opened separate bank accounts: one for accepting allowable contributions under State Law and another for allowable contributions in connection with Federal campaign activities. To our knowledge none of the funds raised as a result of ticket sales to the Glen Campbell Show in 1976 were used in connection with Federal campaign activities but we had not segregated our accounts at the time and therefore the Federal Election Commission held that contributions such as yours were subject to the constraints of Federal Election Laws.

In order to make a corporate contribution to the State Committee, checks should simply be made out to the Missouri Republican State Committee. Contributions to our Federal Account must of course be allowable and specifically designated for such account.


Thanks for your assistance in this matter.

Sincerely,

Bill Thudium

William E. Thudium

Asst. to the Chairman


**Missouri
Republican
State Committee**

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1016

JUNE 6 1979

80-306
865

PAY
TO THE
ORDER OF

Norton Corporation

\$ 600.00

Six hundred & 00/100

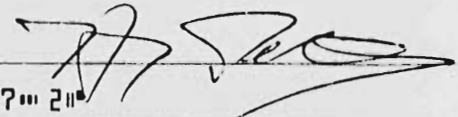
DOLLARS

 **united missouri bank**
of jefferson city,
Jefferson City, Missouri 65101

Refund

⑈00001016⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈



REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1017

JUNE 12 1979

80-306
865

PAY
TO THE
ORDER OF

Norton Corporation

\$ 50.00

Fifty & 00/100

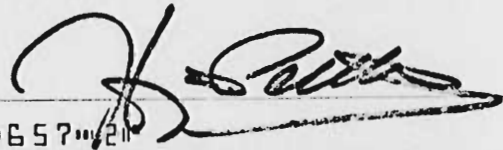
DOLLARS

 **united missouri bank**
of jefferson city,
Jefferson City, Missouri 65101

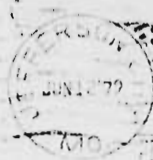
Refund

⑈00001017⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈



79040153629



Attention:

SUSAN HESSLER
NOR BL

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

Missouri
Republican
State Committee

BOX 73, 607 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102

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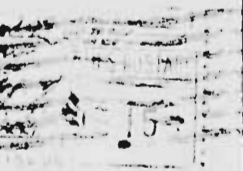
**Missouri
Republican
State Committee**

BOX 73, 607 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102

JUN 21 1979

FRANCES B. HAGAN
Federal Election Commission
1325 K. STREET, N.W.
Washington, D.C.

20463





FEDERAL ELECTION COMMISSION

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

June 8, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Harvey Tettlebaum, Treasurer
Missouri Republican State Committee
Box 73
507 E. High Street
Jefferson City, Missouri 65102

Re: MUR 948

Dear Mr. Tettlebaum:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe your Committee may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that the Missouri Republican State Committee accepted three corporate contributions during the 1976 elections in apparent violation of 2 U.S.C. § 441b(a) which prohibits the use of corporate funds in connection with a federal election. We have numbered this matter MUR 948.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials not already provided to the Audit Division which you believe are relevant to the Commission's analysis of this matter. Specifically, please provide copies (front and back) of cancelled refund checks to each corporate contributor.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.



If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

7 2 0 1 0 1 5 3 6 3 3

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

MAR 4 1978 FH

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.		
1. The following service is requested (check one): <input type="checkbox"/> Show to whom and date delivered <input checked="" type="checkbox"/> Show to whom, date, and address of delivery <input type="checkbox"/> RESTRICTED DELIVERY Show to whom and date delivered <input type="checkbox"/> RESTRICTED DELIVERY Show to whom, date, and address of delivery (CONSULT POSTMASTER FOR FEES)		
2. ARTICLE ADDRESSED TO: Mr. Harvey Tellebaum		
3. ARTICLE DESCRIPTION: REGISTERED NO. CERTIFIED NO. INSURED NO. 939076		
(Always obtain signature of addressee or agent)		
I have received the article described above. SIGNATURE <input checked="" type="checkbox"/> Addressee <input type="checkbox"/> Authorized agent Sharon D. Chue		
4. DATE OF DELIVERY JUN 11 1978		POSTMARK
5. JUN 11 1978 (only if requested)		
6. UNABLE TO DELIVER BECAUSE:		CLERK'S INITIALS

★GPO: 1977-0-240-505



FEDERAL ELECTION COMMISSION

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

June 8, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Krey Packing Company
3607 N. Florissant Avenue
St. Louis, Missouri 63166

Re: MUR 948

Dear Sir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe your corporation, the Krey Packing Company, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that the Krey Packing Company contributed \$212.50 to the Missouri Republican State Committee in 1976 in apparent violation of 2 U.S.C. § 441b(a) which prohibits the use of corporate funds in connection with federal elections. We have numbered this matter MUR 948.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit a statement relevant to the Commission's analysis of this matter and provide confirmation of the Missouri Republican State Committee's refund of your contribution upon receipt.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.



If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

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

FH 1948

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

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

2. ARTICLE ADDRESSED TO:
Krug Packing Company

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
439981

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY *JUN 11 1978*

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER BECAUSE

POST OFFICE BOX 330

STAR 1977-6-249555



FEDERAL ELECTION COMMISSION

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

June 8, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. O. Kuhlman
Monroe City Diecasting Co.
125 Front Street
Monroe City, Missouri 63456

Re: MUR 948

Dear Mr. Kuhlman:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your corporation, the Monroe City Diecasting Co., may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that the Monroe City Diecasting Co. contributed \$100 to the Missouri Republican State Committee in 1976 in apparent violation of 2 U.S.C. § 441b(a) which prohibits the use of corporate funds in connection with Federal elections. We have numbered this matter MUR 948.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit a statement relevant to the Commission's analysis of this matter and provide confirmation of the Missouri Republican State Committee's refund of your contribution upon receipt.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

15 FORM 3871, APR. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

M 948 FH

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

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

2. ARTICLE ADDRESSED TO:
Mr. L. C. Kuhlman

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
| *438082* |

(Always obtain signature of addressee or agent)

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

DATE OF DELIVERY
6-11-79

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS
all

WASH DC CITY, MD
JUN 11 1979
USPO

★ 1977-6-28-000



FEDERAL ELECTION COMMISSION

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

June 8, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. R.H. Harper
Vice President
Nooter Corporation
P.O. Box 451
St. Louis, Missouri 63166

Re: MUR 948

Dear Mr. Harper:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your corporation may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that the Nooter Corporation contributed \$650 to the Missouri Republican State Committee in 1976 in apparent violation of 2 U.S.C. § 441b(a) which prohibits the use of corporate funds in connection with Federal elections. We have numbered this matter MUR 948.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit a statement relevant to the Commission's analysis of this matter and provide confirmation of the Missouri Republican State Committee's refund of your contribution upon receipt.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public. If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

7 2 1 0 1 3 3 6 3 9

FH M948

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

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

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

2. ARTICLE ADDRESSED TO:
R. H. Harper

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
437083
(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
JUN 11 1979
CLERK'S INITIALS
JK

11-977-0-240-506

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Missouri Republican State Committee)
Monroe City Diecasting Company) MUR 948
Krey Packing Company)
Nooter Corporation)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, certify that on May 23, 1979, the Commission took the following actions in MUR 948 by a vote of 6-0:

1. FOUND REASON TO BELIEVE that the Missouri Republican State Committee violated 2 U.S.C. §441b(a).
2. FOUND REASON TO BELIEVE that the Monroe City Diecasting Company violated 2 U.S.C. §441b(a).
3. FOUND REASON TO BELIEVE that the Krey Packing Company violated 2 U.S.C. §441b(a).
4. FOUND REASON TO BELIEVE that the Nooter Corporation violated 2 U.S.C. §441b(a).
5. Approved the sending of the letters attached to the May 15, 1979 General Counsel's Report in this matter, subject to amendment of the letter to Monroe City Diecasting Company.

Attest:

5/23/79

Date

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

7 2 0 1 0 1 3 3 6 4 0



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *mwe*
DATE: MAY 17, 1979
SUBJECT: MUR 948 - First General Counsel's Report
dated 5-15-79: Received in OCS
5-15-79, 10:57

The above-named document was circulated on a 48
hour vote basis at 4:30, May 15, 1979.

Commissioner Friedersdorf submitted an objection at
4:13, May 16, 1979, thereby placing MUR 948 on the Executive
Session Agenda for May 23, 1979.

7701013641

May 15, 1979

MEMORANDUM TO: Marge Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 948

Please have the attached First General Counsel's
Report on MUR 948 distributed to the Commission on a
48 hour tally basis.

Thankyou.

72210155642

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION MAY 15 1979

MUR NO. 948
STAFF MEMBER (S) Hagan

SOURCE OF MUR: I N T E R N A L L Y G E N E R A T E D

RESPONDENT'S NAME: Missouri Republican State Committee
Monroe City Diecasting Company
Krey Packing Company
Nooter Corporation
RELEVANT STATUTE: 2 U.S.C. § 441b(a)

INTERNAL REPORTS CHECKED: Audit Referral

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Audit Division as a result of a routine audit of the Missouri Republican State Committee.

SUMMARY OF ALLEGATIONS

The Missouri Republican State Committee ("the Committee") accepted contributions from three corporations in violation of 2 U.S.C. § 441b(a). Monroe City Diecasting Company, Krey Packing Company, and Nooter Corporation made contributions to the Committee in violation of 2 U.S.C. § 441b(a).

PRELIMINARY LEGAL ANALYSIS

During the audit of the Missouri Republican State Committee, auditors discovered that the Committee received three contributions in 1976 totaling \$962.50 from three corporations listed below:

<u>CORPORATION</u>	<u>DATE OF CONTRIBUTION</u>	<u>AMOUNT OF CONTRIBUTION</u>
Monroe City Diecasting Company	3/12/76	\$100.00
Krey Packing Company	2/10/76	\$212.50
Nooter Corporation	1/29/76	\$650.00
	TOTAL:	\$962.50

The Committee received written confirmation of the corporate source of two contributions (See Attachment I) and verified the third by telephone. The corporations purchased groups of tickets at various prices for a Committee fundraising event.

On the advice of auditors, the Committee agreed to refund the corporate monies. The Committee explained to the auditors that its cash fund was insufficient to make prompt refunds, but that it anticipates receipt of additional funds in the near future. The Committee has since refunded \$100.00 to the Monroe City Diecasting Company (See Attachment II).

RECOMMENDATION

1. Find reason to believe that the Missouri Republican State Committee violated 2 U.S.C. § 441b(a).
2. Find reason to believe that the Monroe City Diecasting Company violated 2 U.S.C. § 441b(a).
3. Find reason to believe that the Krey Packing Company violated 2 U.S.C. § 441b(a).
4. Find reason to believe that the Nooter Corporation violated 2 U.S.C. § 441b(a).
5. Send the attached letters.

Attachments:

3 Letters
Attachment Ia, Ib, IIa, IIb

77040153644

STANLEY I. DALE
Chairman

ERNESTINE BECKMAN
Vice-Chairman

GILDA MANNING
Secretary

HARVEY TETLEDAUM
Treasurer

HOWARD C. OHLENDORF
State Finance Chairman

JEWETT M. FULKERSON
National Committeewoman

EYVON MENDENHALL
National Committeewoman

December 21, 1978

Mr. David Kuhlman
Monroe City Diecasting Co.
125 Front Street
Monroe City, Missouri 63456

Dear Mr. Kuhlman:

The Missouri Republican State Committee is presently being audited by the Federal Elections Commission. During an "exit session" the auditors questioned a particular contribution which they think may have been corporate. In the event they are correct the State Committee will be required to reimburse the Company for a like amount.

According to our records, our Committee received during 1976 a check in the amount of \$100.00 for which tickets were purchased to our February 27, 1976 Glen Campbell Show in Kansas City. We need now to determine if that check was drawn on a company account or if it was personal. We would appreciate your checking into this, and letting this office know of the correct circumstances in a written statement. Please reply as soon as possible.

Sincerely,

Bill Thudium

William E. Thudium
Executive Director

January 11, 1979

In reply to your above request, the check was from the corporation of Kuhlman Diecasting Company.

L. O. Kuhlman



Missouri
Republican
State Committee

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

Attachment I a

7 2 0 1 0 1 3 3 6 4 5

NOOTER CORPORATION
1400 SOUTH THIRD STREET
SAINT LOUIS, MISSOURI

December 28, 1978 12 PM 2:03

ROBERT H. HARPER
VICE PRESIDENT-ADMINISTRATION

MAILING ADDRESS:
POST OFFICE BOX 451
SAINT LOUIS, MISSOURI 63166

Mr. William E. Thudium
Executive Director
Missouri Republican State Committee
Box 73, 507 East High Street
Jefferson City, Missouri 65102

900184

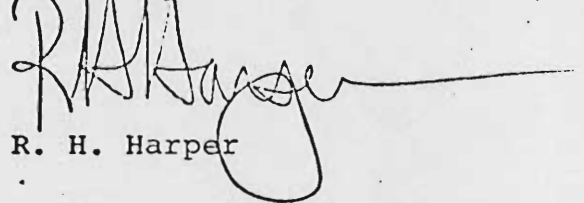
Dear Mr. Thudium:

Yes, our corporation sent the check for the Glen Campbell Show in the amount of \$650.00 -- dated January 27, 1976.

If you would like a copy of this check, please let me know.

Sincere best wishes.

Cordially



R. H. Harper

RHH:nj

Attachment I b

79010153646

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 APR 30 AM 9:40

April 27, 1979

STANLEY I. DALE
Chairman
ERNESTINE BECKMAN
Vice Chairman
GILDA MANNING
Secretary
HARVEY TETTELBAUM
Treasurer
HOWARD C. OHLENDORF
State Finance Chairman
WETT M. FULKERSON
National Committeeman
EYVON MENDENHALL
National Committeewoman

Mr. L. O. Kuhlman
Monroe City Diecasting Co.
135 Front St.
Monroe City, Mo. 63456

Dear Mr. Kuhlman:

Enclosed please find check #1015 drawn by the Republican State Committee - Federal Fund in the amount of \$100.00. This check, payable to the Monroe City Diecasting Corporation, represents a reimbursement by the State Committee for inadvertently accepting a \$100.00 contribution from said corporation in connection with our 1976 Glen Campbell Show ticket sales program.

Although under current Missouri Election Laws corporate & union political contributions may be accepted by political committees and candidates, Federal Election Laws do not allow such contributions. As a result the Missouri Republican State Committee opened separate bank accounts: one for accepting allowable contributions under State Law and another for allowable contributions in connection with Federal campaign activities. To our knowledge none of the funds raised as a result of ticket sales to the Glen Campbell Show in 1976 were used in connection with Federal campaign activities but we had not segregated our accounts at the time and therefore the Federal Election Commission held that contributions such as yours were subject to the constraints of Federal Election Laws.

In order to make a corporate contribution to the State Committee, checks should simply be made out to the Missouri Republican State Committee. Contributions to our Federal Account must of course be allowable and specifically designated for such account.

Thanks for your assistance in this matter.

Sincerely,

Bill Thudium

William E. Thudium
Asst. to the Chairman



Missouri
Republican
State Committee

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

Attachment II a

REPUBLICAN STATE COMMITTEE
FEDERAL FUND ACCOUNT
P. O. BOX 73 314-636-3146
JEFFERSON CITY, MO. 65102

1015

80-306
865

April 20 1979

PAY
TO THE
ORDER OF

Monroe City Diecasting Corporation

\$100.00

One hundred & 00/100

DOLLARS



united missouri bank
of jefferson city,
Jefferson City, Missouri 65101

Reimbursement

⑈00001015⑈ ⑆⑈086503068⑈

⑈00⑈657⑈2⑈

Attachment II b



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Krey Packing Company
3607 N. Florissant Avenue
St. Louis, Missouri 63166

Re: MUR 948

Dear Sir:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe your corporation, the Krey Packing Company, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically, it appears that the Krey Packing Company contributed \$212.50 to the Missouri Republican State Committee in 1976 in apparent violation of 2 U.S.C. § 441b(a) which prohibits the use of corporate funds in connection with Federal elections. We have numbered this matter MUR 948.

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

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 523-4060.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.

- 2 -

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

7/20/01 33650



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. R.H. Harper, Vice President
Nooter Corporation
P.O. Box 451
St. Louis, Missouri 63166

Re: MUR 948

Dear Mr. Harper:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your corporation, The Nooter Corporation, may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that The Nooter Corporation contributed \$650.00 to the Missouri Republican State Committee in 1976 in apparent violation of 2 U.S.C. § 441b(a) which prohibits the use of corporate funds in connection with Federal elections. We have numbered this matter MUR 948.

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

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202)-523-4060.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.



- 2 -

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

710133652



FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. L. O. Kuhlman
Monroe City Diecasting Co.
125 Front Street
Monroe City, Missouri 63456

Re: MUR 948

Dear Mr. Kuhlman:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission has found reason to believe that your corporation, The Monroe City Diecasting Co., may have violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). Specifically it appears that The Monroe City Diecasting Co. contributed \$100.00 to the Missouri Republican State Committee in 1976 in apparent violation of 2 U.S.C. § 441b(a) which prohibits the use of corporate funds in connection with Federal elections. We have numbered this matter MUR 948.

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

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202)-523-4060.

This matter will remain confidential in accordance with 2 U.S.C. Section 437g(a)(3)(B) unless you notify the Commission in writing that you wish the investigation to be made public.



- 2 -

If you intend to be represented by counsel in this matter, please have such counsel so notify us in writing.

Sincerely,

William C. Oldaker
General Counsel

7133654



FEDERAL ELECTION COMMISSION

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

March 8, 1979

MEMORANDUM

TO : WILLIAM OLDAKER

THROUGH : ORLANDO B. POTTER *OBP*
STAFF DIRECTOR

FROM : *RC* BOB COSTA/RUSS BRUNER *RB*

SUBJECT : AUDIT OF THE MISSOURI REPUBLICAN
STATE COMMITTEE

The attached memo regarding the acceptance of prohibited funds by the Missouri Republican State Committee ("MRSC") is being forwarded to the Office of General Counsel prior to the receipt by the Audit staff of written confirmation that the contributions have been refunded.

MRSC has agreed to refund the contributions; however, at the present time does not have sufficient funds to do so. MRSC anticipates the receipt of sufficient funds within the next several weeks to make the refunds and will forward copies of the cancelled checks (front and back) as soon as they have cleared the bank. The Audit staff will forward additional information to the Office of General Counsel as it becomes available.

Attachment as stated





FEDERAL ELECTION COMMISSION

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

March 8, 1979

MEMORANDUM

TO : WILLIAM OLDAKER

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

FROM : *RC* BOB COSTA/RUSS BRUNER/PAULA KING *PK.*

SUBJECT : AUDIT OF THE MISSOURI REPUBLICAN STATE
COMMITTEE-VIOLATIONS OF SECTIONS 441a and 441b.

During the audit of the Missouri Republican State Committee ("MRSC") corporate and excessive contributions were noted which are being referred to your office for consideration as a possible MUR.

The audit of MRSC covered the period January 1, 1976 through June 30, 1978, the final coverage date of the latest report filed at the time of the audit.

1. Corporate Contributions

Section 441b(a) of Title 2 of the United States Code, states in part, that it is unlawful for any corporation to make a contribution or expenditure in connection with any election to any political office, or for any candidate, political committee, or other person knowingly to accept or receive any contribution prohibited by this section.

During the course of the audit it was noted that three (3) contributions from three (3) apparent corporations totaling \$962.50 were accepted by MRSC in connection with fundraising concerts held in February of 1976. (See Attachment I)



Tickets to the event were sold for \$5.50, \$6.50, \$7.50 and \$50.00. MRSC's Executive Director stated that no profit was realized on the sale of \$5.50, \$6.50 and \$7.50 tickets, however a net amount of \$42.50 was realized from the sale of each \$50.00 ticket.

The \$100.00 received from the Monroe City Diecasting Co. was in purchase of two (2) \$50.00 tickets, the remaining \$862.50 from corporations was received in purchase of blocks of the regular \$5.50, \$6.50 and \$7.50 tickets.

MRSC's Executive Director was advised of this situation at the conclusion of the fieldwork and was requested to determine the sources from which these funds were drawn. It was recommended that contributions determined to be from corporate sources be refunded. MRSC has determined that each of the three (3) contributions in question were drawn from corporate sources and has furnished the Audit staff with written confirmation that the Nooter Corporation and the Monroe City Diecasting Company had purchased tickets with checks drawn from corporate sources. (See Attachment II). MRSC's Executive Director confirmed by phone that the contribution from the Krey Packing Co. was drawn from corporate sources but to date has not furnished the Audit staff with written confirmation thereof. Additional information will be forwarded to the Office of the General Counsel as it becomes available.

In a phone conversation on February 26, 1979, MRSC's Executive Director informed the Audit staff that MRSC does not have sufficient funds at the present time with which to refund the contributions, but anticipates the receipt of sufficient funds within the next several weeks to enable MRSC to do so. MRSC's Executive Director will forward evidence of the refunds (fronts and backs of the cancelled checks) to the Audit staff as soon as they have cleared the bank.

2. Contributions in Excess of Limitation

Section 441a(a)(1)(C) of Title 2 of the United States Code states, in relevant part, that no person shall make contributions to a state party committee in any calendar year which, in the aggregate, exceed \$5,000.

In addition, Section 441a(f) states, in part, that no political committee shall knowingly accept any contributions in violation of the provisions of this section.

Section 100.4(a)(1)(i) of Title 11 of the Commission's Regulations states, in relevant part, that a loan is a contribution to the extent that the obligation remains outstanding.

During the course of the audit it was determined that an individual paid expenses on behalf of MRSC, amounting to \$27,853.00, during the period 10-1-75 through 3-16-77. (See Attachment III) \$26,978.00 of these expenditures were paid prior to 5-11-76, the effective date of the statutory limitations with respect to such contributions, however, as cited above, a loan is a contribution to the extent that the obligation remains outstanding. In addition to this, the individual endorsed a \$1,075.00 portion of \$30,000.00 borrowed by MRSC in June of 1976, and contributed \$100.00 in 1976 and \$400.00 in 1977.

MRSC reflected the \$27,853.00 as a debt owed to the individual on the schedule of debts and obligations in its disclosure reports.

In February of 1978, MRSC paid the individual \$22,853.00 of this debt. (See Attachment III) The remaining \$5,000 of the debt was forgiven by the individual as a personal contribution.

If you have any questions relating to the matters discussed above please contact Russ Bruner or Paula King on extension 3-4057.

Attachments as stated

ATTACHMENT I

CONTRIBUTIONS FROM CORPORATIONS

<u>Name & Address</u>	<u>Date of Incorporation</u>	<u>Date of Contri- bution per Con- tributor Records</u>	<u>Amount</u>
Monroe City Die- casting Co. Highway 26 Monroe City, Mo.	2-5-1954	3-12-1976	\$ 100.00
Krey Packing Co. 3607 N. Florissant Ave. St. Louis, Mo.	12-9-1896	2-10-1976	212.50
Nooter Corporation 1400 South 3rd Street St. Louis, Mo.	2-14-1974	1-29-1976	<u>650.00</u>
		Total	\$962.50

7 2 0 4 0 1 5 3 6 5 9

STANLEY I. DALE
Chairman

ERNESTINE BECKMAN
Vice-Chairman

GILDA MANNING
Secretary

HARVEY TETTLBAUM
Treasurer

HOWARD C. OHLENDORF
State Finance Chairman

JEWETT M. FULKERSON
National Committeewoman

EYVON MENDENHALL
National Committeewoman

December 21, 1978

Mr. David Kuhlman
Monroe City Diecasting Co.
125 Front Street
Monroe City, Missouri 63456

Dear Mr. Kuhlman:

The Missouri Republican State Committee is presently being audited by the Federal Elections Commission. During an "exit session" the auditors questioned a particular contribution which they think may have been corporate. In the event they are correct the State Committee will be required to reimburse the Company for a like amount.

According to our records, our Committee received during 1976 a check in the amount of \$100.00 for which tickets were purchased to our February 27, 1976 Glen Campbell Show in Kansas City. We need now to determine if that check was drawn on a company account or if it was personal. We would appreciate your checking into this, and letting this office know of the correct circumstances in a written statement. Please reply as soon as possible.

Sincerely,

Bill Thudium

William E. Thudium
Executive Director

January 11, 1979

In reply to your above request, the check was from the corporation of Kuhlman Diecasting Company.

L. O. Kuhlman



Missouri
Republican
State Committee

BOX 73, 507 EAST HIGH STREET
PROFESSIONAL BUILDING, JEFFERSON CITY, MISSOURI 65102
AC 314-636-3146

79040153660

NOOTER CORPORATION
1400 SOUTH THIRD STREET
SAINT LOUIS, MISSOURI

December 28, 1978 12 PM 2:03

ROBERT H. HARPER
VICE PRESIDENT-ADMINISTRATION

MAILING ADDRESS:
POST OFFICE BOX 451
SAINT LOUIS, MISSOURI 63166

Mr. William E. Thudium
Executive Director
Missouri Republican State Committee
Box 73, 507 East High Street
Jefferson City, Missouri 65102

900194

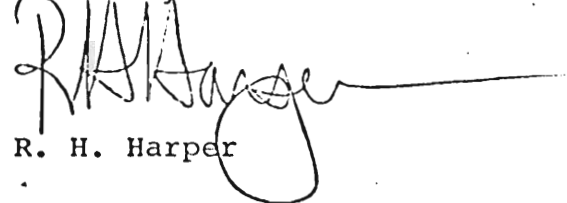
Dear Mr. Thudium:

Yes, our corporation sent the check for the Glen Campbell Show in the amount of \$650.00 -- dated January 27, 1976.

If you would like a copy of this check, please let me know.

Sincere best wishes.

Cordially


R. H. Harper

RHH:nj

7 2 2 0 1 3 3 6 6 1

ATTACHMENT III

MRSC Expenses Paid by Individual

10-1-75	\$11,050.00
2-25-76	15,000.00
3-12-76	650.00
4-19-76	278.00
10-27-76	65.00
11-11-76	65.00
12-16-76	100.00
2-18-77	515.00
3-16-77	<u>130.00</u>
Total	\$27,853.00

Reimbursement to Individual by MRSC

2-7-78	\$ 2,643.31
2-14-78	7,000.00
2-20-78	<u>13,209.69</u>
Total	\$22,853.00 <u>1/</u>

1/ \$5,000 of the debt was forgiven by the individual as a personal contribution.

Additional Contributions and
Loan Endorsement by Individual

2-25-76	\$ 50.00 <u>2/</u>
6-15-76	1,075.00 <u>3/</u>
8-4-76	50.00
2-14-77	400.00

2/ Gold Circle ticket purchase for February, 1976 fundraising concert. (The actual value of the ticket was \$7.50. See Part A)

3/ Individual was one of 28 endorsers for a \$30,000.00 loan borrowed by MRSC.

Repayment of the loan was made as follows:

10-28-77	\$2,000.00
1-6-78	5,000.00
1-20-78	6,000.00
1-31-78	5,000.00
2-9-78	12,000.00

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FEDERAL ELECTION COMMISSION

1125 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 948

Date Filmed 9/18/79 Camera No. --- 2

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