



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1217

Date Filmed 6/16/83 Camera No. --- 2

Cameraman SPC

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FEDERAL ELECTION COMMISSION

1217

Materials relating to the conciliation process
and remarks of Commissioners

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

- | | | | |
|-------------------------------------|---|--------------------------|--|
| <input type="checkbox"/> | (1) Classified Information | <input type="checkbox"/> | (6) Personal privacy. |
| <input type="checkbox"/> | (2) Internal rules and practices | <input type="checkbox"/> | (7) Investigatory files |
| <input checked="" type="checkbox"/> | (3) Exempted by other statute | <input type="checkbox"/> | (8) Banking Information |
| <input type="checkbox"/> | (4) Trade secrets and commercial or financial information | <input type="checkbox"/> | (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> | (5) Internal Documents | | |

Signed P. Lee Anderson
date 5/5/83

FEC 9-21-77

YAO
5/20/83

83040395349



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1983

Daniel C. Mooney, Esquire
Suozzi, English, Cianciulli
& Peirez, P.C.
1505 Kellum Place
Mineola, New York 11501

Re: MUR 1217

Dear Mr. Mooney:

On July 1, 1980, the Commission found reason to believe that your client, Citizens for Congressman Ambro, had violated 2 U.S.C. § 441(a)(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to R. Lee Andersen at (202)523-5071.

Sincerely,

Danny L. McDonald
DANNY L. McDONALD
Chairman

83040395350



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Daniel C. Mooney, Esquire
Suozzi, English, Cianciulli
& Peirez, P.C.
1505 Kellum Place
Mineola, New York 11501

RRH 3/20/83

Re: MUR 1217

Dear Mr. Mooney:

On July 1, 1980, the Commission found reason to believe that your client, Citizens for Congressman Ambro, had violated 2 U.S.C. § 441(a)(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to R. Lee Andersen at (202)523-5071.

Sincerely,

330403953351



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 23, 1983

Thomas J. Schwartz, Esquire
Skadden, Arps, Slate, Meagher
& Flom
191 Third Avenue
New York, New York 10022

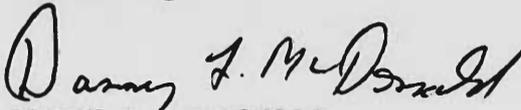
Re: MUR 1217

Dear Mr. Schwartz:

On July 1, 1980, the Commission found reason to believe that your client, Citizens for Downey, had violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to R. Lee Andersen at (202)523-5071.

Sincerely,


DANNY L. McDONALD
Chairman

33040395332



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Thomas J. Schwartz, Esquire
Skadden, Arps, Slate, Meagher
& Flom
191 Third Avenue
New York, New York 10022

RHF 3/28/83

Re: MUR 1217

Dear Mr. Schwartz:

On July 1, 1980, the Commission found reason to believe that your client, Citizens for Downey, had violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to R. Lee Andersen at (202)523-5071.

Sincerely,

3304069533

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Citizens for Downey) MUR 1217
Citizens for Congressman Ambro)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 11, 1983, the Commission decided by a vote of 5-0 to take no further action in this matter and close the file.

Commissioners Aikens, Elliott, McDonald, McGarry and Reiche voted affirmatively in this matter; Commissioner Harris did not cast a vote.

Attest:

3/11/83
Date

Jody C. Hanson
for Marjorie W. Emmons
Secretary of the Commission

8304039534

Received in Office of Commission Secretary: 3-8-83, 4:25
Circulated on 48 hour tally basis: 3-9-83, 11:00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: Office of the Commission Secretary
FROM: Office of General Counsel
DATE: March 8, 1983
SUBJECT: MUR 1217 - GC Rpt

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

CIRCULATIONS

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

Other []

DISTRIBUTION

Compliance [✓]
Audit Matters []
Litigation []
Closed MUR Letters []
Status Sheets []
Advisory Opinions []

Other (see distribution below) []

3304039535

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 MAR 8 P 4: 25

In the Matter of)
)
Citizens for Downey, and) MUR 1217
Citizens for Congressman Ambro)

SENSITIVE

GENERAL COUNSEL'S REPORT

I. Background

In 1978 the Suffolk County Democratic Committee ("SCD") made the following contributions to three authorized committees: \$3,000 to Citizens for Downey ("Downey"); \$3,000 to Citizens for Congressman Ambro (formerly the Committee to Re-elect Congressman Ambro) ("Ambro"); and \$4,000 to Citizens for John Randolph ("Randolph"). The contributions exceeded the \$1,000 limitation for contributions by political committees not qualifying for multicandidate status. See 2 U.S.C. § 441a(a)(4) of the Federal Election Campaign Act of 1971, as amended (the "Act"). In response to Requests for Additional Information ("RFAI's") issued by the Commission to the authorized committees on October 16, 1979, Downey and Ambro returned the excess contributions they had received from SCD. The refunds were made shortly after the Reports Analysis Division ("RAD") notified the respondents of the problem. The Randolph committee, however, did not make a refund for the stated reason that it was insolvent at the time of the Commission's issuance of the RFAI's.

On July 1, 1980, the Commission found reason to believe that the SCD violated 2 U.S.C. § 441a(a) and that the Downey, Ambro and Randolph committees violated 2 U.S.C. § 441a(f) of the Act.

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Respondents were notified of the determinations. The Office of General Counsel prepared a brief recommending that the Commission find probable cause to believe that the respondents violated the provisions of the FECA noted above and circulated the brief to the Commission and the respondents on October 27, 1980.

The

SCD and Randolph committees accepted the agreements largely as proposed by the Commission and signed them respectively on May 28, 1981, and on June 5, 1981. The Commission made a determination to accept the signed conciliation agreements on March 31, 1982, and, as provided in the agreements, SCD paid \$500 and Randolph paid \$250 in civil penalties.

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Counsel for the Downey and Ambro committees were contacted by telephone the week of February 14, 1983. Counsel for Downey expressed a willingness to consider additional Commission proposals for the resolution of this matter

Counsel for both

committees urged that these matters be concluded in that the activities related to the 1978 election cycle.

II. Legal and Factual Analysis

The Downey and Ambro committees have strenuously denied culpability in this matter, and the record is consistent with the position taken by respondents that the excess contributions were made through SDC's ignorance of the multicandidate requirements of the Act. Furthermore, both Downey and Ambro returned the excess contributions immediately following notification by RAD that they had been made.

Finally, the excess contributions received were not great when compared with the total receipts for each of the candidate committees. Both Ambro and Downey raised substantial funds with Downey reporting gross receipts of \$155,430 and Ambro reporting gross receipts of \$79,249 for the 1978 election cycle. Thus looking at all of the circumstances in this matter, the alleged violations of the Act are insufficiently significant to warrant further Commission proceedings. Therefore, the Office of General Counsel recommends that the Commission take no further action and close the file.

83040395358

III. Recommendations

The Office of General Counsel recommends that the Commission take no further action in this matter and close the file.

Charles N. Steele
General Counsel

March 8, 1983
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

Letters to counsel for the Downey and Ambro committees

33040395359



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Thomas J. Schwartz, Esquire
Skadden, Arps, Slate, Meagher
& Flom
191 Third Avenue
New York, New York 10022

Re: MUR 1217

Dear Mr. Schwartz:

On July 1, 1980, the Commission found reason to believe that your client, Citizens for Downey, had violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to R. Lee Andersen at (202)523-5071.

Sincerely,

Attachment

83040395360



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Daniel C. Mooney, Esquire
Suozzi, English, Cianciulli
& Peirez, P.C.
1505 Kellum Place
Mineola, New York 11501

Re: MUR 1217

Dear Mr. Mooney:

On July 1, 1980, the Commission found reason to believe that your client, Citizens for Congressman Ambro, had violated 2 U.S.C. § 441(a)(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"), in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please direct them to R. Lee Andersen at (202)523-5071.

Sincerely,

33040395361



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 13, 1982

Paul S. Rosen, Treasurer
Citizens for John Randolph
La Bonne Vie Apartments, Building 34C
East Patchogue, New York 11772

RE: MUR 1217

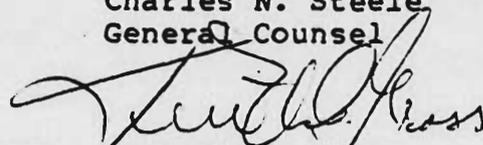
Dear Mr. Rosen:

On March 30, 1982, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, as it pertains to you and it will become part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

3304039533

100825
GCC#4881
31 JUN 15 8:09
RECEIVED
GENERAL COUNSEL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1217
Citizens for John)
Randolph)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after reason to believe having been found that the Citizens for John Randolph Committee ("Respondent") violated 2 U.S.C. § 441a.

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

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.
- III. Respondent enters voluntarily into this Agreement with the Commission.
- IV. The pertinent facts in this matter are as follows:
 - 1. Respondent is the principal campaign committee of John Randolph.
 - 2. On October 20, 1978, Respondent accepted a \$4,000 loan from the Suffolk County Democratic Committee ("Committee") a committee that is not a qualified multi-candidate committee.

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3. At the time the contribution was made, the committee was limited to making a contribution of \$1,000 pursuant to 2 U.S.C. § 441a(a)(10(A)).

WHEREFORE, the Respondent agrees:

V. The acceptance of \$4,000 on October 20, 1978 by the respondent from the Suffolk County Democratic Committee constitutes a violation of 2 U.S.C. § 441a(f).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of two hundred and fifty dollars (\$250.00) pursuant to 2 U.S.C. § 437g(a)(95)(a).

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

GENERAL CONDITIONS

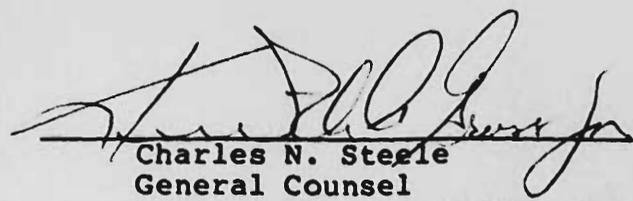
VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute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

IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

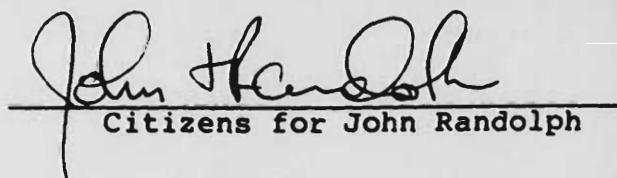
83040395334

X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

April 12, 1982
Date


Charles N. Stegle
General Counsel
Federal Election Commission

6/5/81
Date


Citizens for John Randolph

BY: _____

ITS: _____

83040395355



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 13, 1982

David C. Weisberg
Suffolk County Democratic Committee
110 North Ocean Avenue
Patchogue, New York 11772

RE: MUR 1217

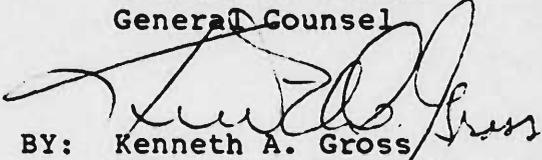
Dear Mr. Weisberg:

8 3 3 0 4 0 5 9 5 6 6
On March 30, 1982, the Commission accepted the conciliation agreement by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, as it pertains to you and it will become part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1217
The Suffolk County)
Democratic Committee)

CONCILIATION AGREEMENT

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and after reason to believe having been found that the Suffolk County Democratic Committee ("Respondent") violated 2 U.S.C. § 441a.

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

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

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

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

IV. The pertinent facts in this matter are as follows:

1. Respondent ~~was~~ not a qualified multi-candidate committee pursuant to 2 U.S.C. § 441a(a)(4) at the time of the making of the contributions referred to herein.

2. On October 23, 1978 the respondent contributed \$3,000 to the Committee to Re-elect Congressman Ambro.

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3. On October 20, 1978, the respondent contributed \$4,000 to the Citizens for John Randolph.

4. November 6, 1978, the respondent contributed \$3,000 to the Citizens for Downey Committee.

5. At the time the contributions were made, the Respondent was limited to making contributions of \$1,000 pursuant to 2 U.S.C. § 441a(a)(1)(A).

WHEREFORE, Respondent agrees:

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V. Respondent's contribution of \$4,000 to the Citizens for John Randolph, \$3,000 to the Citizens for Downey Committee, and \$3,000 to the Committee to Re-Elect Congressman Ambro constitute three separate violations of 2 U.S.C. § 441a(a)(1)(A).

VI. Respondent will pay a civil penalty to the Treasury of the United States in the amount of five hundred dollars (\$500.00) pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

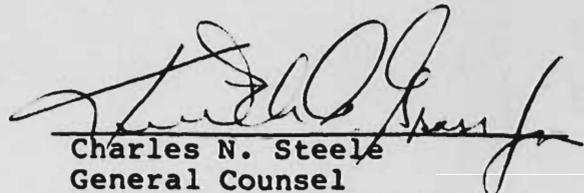
GENERAL CONDITIONS

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

IX. It is mutually agreed that this agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

April 12, 1982
Date


Charles N. Steele
General Counsel
Federal Election Commission

SUFFOLK COUNTY DEMOCRATIC COMMITTEE

by: 
Treasurer

May 28, 1981
Date

BY: _____

ITS: _____

83040395359



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

David C. Weisberg
Suffolk County Democratic Committee
110 North Ocean Avenue
Patchogue, New York 11772

RE: MUR 1217

Dear Mr. Weisberg:

On _____, 1982, the Commission accepted the conciliation agreement by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, as it pertains to you and it will become part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

Vk.
2/11/82
Vl.
4/9/82

33040395370



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Paul S. Rosen, Treasurer
Citizens for John Randolph
La Bonne Vie Apartments, Building 34C
East Patchogue, New York 11772

RE: MUR 1217

Dear Mr. Rosen:

33040395371
On _____, 1982, the Commission accepted the conciliation agreement signed by you and a civil penalty in settlement of a violation of 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter, as it pertains to you and it will become part of the public record within thirty days after this matter has been closed with respect to all other respondents involved. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

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

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

vk
2/19/82
4/9/82

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
The Suffolk County Democratic Committee)	MUR 1217
Citizens for John Randolph)	
The Citizens for Downey Committee)	

CERTIFICATIONS

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission Executive Session on March 30, 1982, do hereby certify that the Commission took the following actions in MUR 1217:

1. Decided by a vote of 6-0 to approve the proposed conciliation agreement with the Citizens for John Randolph submitted with the FEC General Counsel's report dated March 22, 1982.
2. Decided by a vote of 6-0 to reject the proposed conciliation agreement with the Citizens for Downey Committee submitted with the General Counsel's report dated March 22, 1982.
3. Decided by a vote of 6-0 to approve the proposed conciliation agreement with the Suffolk County Democratic Committee submitted with the General Counsel's report dated March 22, 1982.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and Reiche voted affirmatively for these decisions.

Attest:

3/31/82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

83040395372



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: MARCH 24, 1982

SUBJECT: ADDITIONAL OBJECTIONS-MUR 1217 Memorandum to
the Commission dated 3-22-82; Received in OCS,
3-22-82, 11:16

You were notified previously of an objection by
Commissioners Harris and McGarry.

Commissioners Elliott and Reiche submitted additional
objections at 2:41 and 3:13, p.m. respectively this date.

This matter will be discussed in executive session
on Tuesday, March 30, 1982.

23040595370



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS / JODY CUSTER *jc*
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: MARCH 24, 1982

SUBJECT: ADDITIONAL OBJECTION - MUR 1217 Memorandum to
the Commission dated 3-22-82; Received in OCS,
3-22-82, 11:16

You were notified previously of an objection by
Commissioner Harris.

Commissioner McGarry submitted an additional objection
at 11:09, March 24, 1982.

This matter will be discussed in executive session
on Tuesday, March 30, 1982.

33040595374



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. HARRIS / JODY CUSTER *JC*
DATE: MARCH 24, 1982
SUBJECT: OBJECTION - MUR 1217 Memorandum to the
Commission dated 3-22-82; Received in OCS,
3-22-82, 11:16

The above-named document was circulated to the Commission on
March 22, 1982 at 4:00.

Commissioner Harris submitted an objection at 5:15, March 23,
1982.

This matter will be placed on the agenda for the Executive
Session of Tuesday, March 30, 1982.

33040395375

March 22, 1982

MEMORANDUM TO: Marjorée W. Emmons

FROM: Phyllis A. Kayson

SUBJECT: MUR 1217

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

Thank you.

Attachment

cc: Sterling

3304039537

BEFORE THE FEDERAL ELECTION COMMISSION

-----x
In The Matter Of The Citizens For : MUR 1217
Downey Committee : AFFIDAVIT
-----x

STATE OF NEW YORK) ss.:
COUNTY OF SUFFOLK)

I, Leonard DeProspero, being duly sworn deposes and says:

1. That I am the treasurer of Citizens for Downey.
2. That in 1978 the Suffolk County Democratic Committee donated Three Thousand Dollars (\$3,000.00) to the aforesaid committee.
3. That at the time the aforesaid contribution was made I inquired whether the Committee had drawn the monies from a special federal account that met the requirements of the FEC and was informed that they were.
4. That it was only upon receipt of the FEC's communication that though the monies in the Suffolk County Democratic Committee's special account had been properly segregated, that I was apprised that some of the other technical requirements of a multi-candidate committee had not been met.
5. I arranged after confirming these irregularities to refund \$2,000.00 to the Suffolk County Democratic Committee which constituted excess donations.

83040695377

6. That at all times I and Citizens For Downey acted in good faith believing that the contribution was permissible and returned that portion that was impermissible upon notification and confirmation of these facts.

Leonard DeProspo
Leonard DeProspo

Sworn to before me this

3rd day of June, 1981

Patrick Kevin Brosnahan, Jr.
Notary Public

PATRICK KEVIN BROSNAMAN, JR.
NOTARY PUBLIC, State of New York
No. 52-4610197
Qualified in Suffolk County
Commission Expires March 30, 1983

33040695678

83040395379

SUOZZI, ENGLISH, CIANCIULLI & PEIREZ, P. C.
1505 KELLUM PLACE
MINEOLA, N. Y. 11501



Certified Mail, R.R.R.

Federal Election Commission

Washington, D. C. 20463

Attention: Victor Sterling, Esq.

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81 MAY 18 P 1: 20

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
919 THIRD AVENUE
NEW YORK 10022

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TELEX: 645889

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EDWIN ROBBINS
SHEILA L. BIRNBAUM
COUNSEL

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LESLIE J. BULMAN
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JAMES A. ROGERS

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BOX 838
WILMINGTON, DELAWARE 19899
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RODMAN WARD, JR.
STEVEN J. ROTHSCILD
*NOT ADMITTED IN NEW YORK

LESLIE H. ARPS
JOSEPH H. FLOM
PETER P. MULLEN
JAMES A. LEVITAN
MAURICE R. ROCHE
BARRY H. GARFINKEL
JOHN D. FERRICK
JAMES C. FREUND
NORMAN H. DONALD III
STEPHEN M. AXINN
MICHAEL W. MITCHELL
BLAINE V. FOGG
KURT KOEGLER
ALFRED J. LAW
ROBERT C. VINCENT, JR.
MICHAEL H. TESTA
JAMES F. O'RORKE, JR.
ROGER S. AARON
PETER A. ATKINS
WILLIAM F. FRANK
MORRIS J. KRAMER
HENRY P. WASSERSTEIN
THEODORE J. KOZLOFF
MICHAEL H. DIAMOND
THOMAS J. SCHWARZ
STUART L. SHAPIRO
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CHARLES W. UFFORD, JR.
DONALD G. DRAPKIN
EDMUND C. DUFFY
WILLIAM N. KRAVITZ
KENNETH A. PLEVAN
VAUGHN C. WILLIAMS
MARK N. KAPLAN
J. PHILLIP ADAMS
JEFFREY GLEKEL
MICHAEL B. GOLDBERG
MICHAEL L. COOK
FRANKLIN M. GITTES
NARC E. HECKER
PEGGY L. KERR
DOUGLAS M. KRAUS
JONATHAN J. LERNER
BARNET PHILLIPS, IV
NEAL R. STOLL

May 15, 1981

1 MAY 18 P 4: 04

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

Attention: Victor Sterling

Re: MUR 1217

Dear Mr. Sterling:

This is to confirm our telephone conversation that I will be away for approximately a week and that upon my return I will be in touch with you to propose a different approach toward the resolution of the above matter.

Thank you for your cooperation.

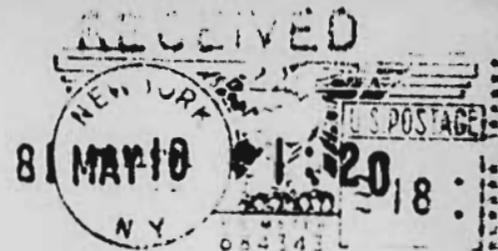
Very truly yours,

Thomas J. Schwarz
Thomas J. Schwarz

cc: Patrick Kevin Brosnahan
Leonard DeProspo

83040375330

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
919 THIRD AVENUE
NEW YORK 10022



Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

83040695381



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
DATE: APRIL 29, 1981
SUBJECT: OBJECTION - MUR 1217 Memorandum to the Commission,
dated 4-24-81; Received in OCS, 4-24-81, 2:12

The above-named document was circulated on a 48
hour vote basis at 11:00, April 27, 1981.

Commissioner Tiernan submitted an objection at 3:56,
April 28, 1981.

This matter will be placed on the Executive Session
Agenda for Tuesday, May 5, 1981.

8304039533

April 24, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. LGarr
SUBJECT: MUR 1217

Have the attached Memo distributed to the
Commission on a 48 hour tally basis. Thank you.

8304039538

Sterling

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SUFFOLK COUNTY DEMOCRATIC LAW COMMITTEE

110 North Ocean Avenue
~~XXXXXXXXXXXX~~
Patchogue, New York 11772

Telephone
(516) 289-1225

David C. Weisberg
Chairman

Gary N. Weintraub
Associate Chairman

November 7, 1980

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GENERAL COUNSEL

- Stanley Ameltin
- John Armentano
- Robert G. Bauer
- Clark Berman
- David H. Besso
- Richard Bords
- John Braslow
Ex-Officio
- Patrick K. Brosnahan, Jr.
- Edward T. Brown
- William M. Burcher
- Mel Cannon
- Ronald S. Carner
- Michael Chetkof
- Edwin S. Clare
- Anthony Corso
- Martin Etman
- Jack B. Factor
- Thomas Fallon
- Richard E. Fish
- Richard Gold
- Harold Goodstein
- Edward W. Jakubowski
- David Judkowitz
- Stuart Kramer
- Susan LeBow
- Steve Lupow
- William P. Maloney, Jr.
- Robert R. McGuin
- Ira Nydick
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- Roger A. Regenbogen
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- Joseph M. Rosenthal
- Joseph Rubin
- Bernard Sarisohn
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- Martin Schrader
- Morton J. Siegel
- Ira Sloane
- Nicholas A. Sordi, Jr.
- Andrew Ullman
- Carl Wand
- Maurice Weinreb
- William Wisnann
- Thomas Young
- Joel Ziegler

Charles N. Steele, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1217

Dear Sirs:

Your letter to the Treasurer of the Suffolk County Democratic Committee under the above number has been referred to me. I am the attorney for the Committee.

Enclosed herewith are three copies of the brief which I am submitting. The other ten copies have, with a copy of this letter, been filed with the Secretary of the Commission.

I must point out to you that we are extremely frustrated by these proceedings. This is not a case of someone attempting to gain some improper advantage due to a violation of the Act. Rather, the history of this case reveals that it arose solely out of the ignorance of the Committee of the requirements of the Act. It is my understanding that a statement for the 1978 campaign registering the Suffolk County Democratic Committee as a multi-candidate committee was, in fact, filed. The Treasurer of the Committee, therefore, in good faith, made contributions which a multi-candidate committee could have made. He was totally unaware of the limitations with respect to the waiting period and the number of candidates to be supported. His good faith is revealed by the fact that a termination statement, revealing the contributions in question, was filed by the Suffolk County Democratic Committee. With respect to all correspondence which has been sent by the Commission staff to the Suffolk County Democratic Committee, there has been a willing and

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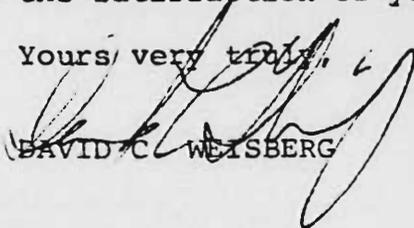
Page 2

November 6, 1980

full expression of cooperation. We have done everything requested of us. We stand ready to do whatever else should reasonably be required. At present, there is no request before us upon which we can act. The Act, itself, clearly indicates that before taking other enforcement proceedings, the staff of the Commission should do whatever is possible to correct the violation by agreement. We stand ready to do that and can not understand why the Commission staff has not been in touch with us to tell us what further it wishes us to do. Moreover, although I do not have all the materials before me with respect to dates that various things took place, I am of the belief that had the Commission advised the Suffolk County Democratic Committee of the alleged violations more promptly after the 1978 election, that, perhaps, more effective action could have been taken with respect to the Randolph Campaign Committee. It was only due to the extreme passage of time that resulted in the Randolph Campaign Committee being dissolved prior to our knowledge of the alleged violations. Certainly, if the Randolph Campaign Committee were still in existence, due to the fact that the Suffolk County Democratic Committee is now a validly registered multi-candidate committee, under the registration number appearing in our brief, we could have made a contribution at this time which could have been in the form of excusing the indebtedness created by the allegedly improper prior contribution.

Accordingly, we feel very strongly that this matter should not proceed any further; at least until we have been given a chance to satisfy your office with whatever reasonably can be accomplished. I would sincerely appreciate a reply directed to me so that I may assist in disposing of this matter to the satisfaction of your office.

Yours very truly,



DAVID C. WEISBERG

DCW:pao

cc: Arthur Minardi, Treasurer
Suffolk County Democratic Committee

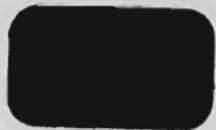
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SKADDEN, ARPS, SLATE, MEAGHER & FLOM

919 THIRD AVENUE

NEW YORK 10022



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



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SUFFOLK COUNTY DEMOCRATIC LAW COMMITTEE

110 North Ocean Avenue
~~XXXXXXXXXXXX~~

Patchogue, New York 11772

600# 3371

Telephone
(516) 289-1225

David C. Weisberg
Chairman

Gary N. Weintraub
Associate Chairman

Stanley Amelkin
John Armentano
Robert G. Bauer
Clark Berman
David H. Besso
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John Breslow
Ex-Officio
Patrick K. Broganahan, Jr.
Edward T. Brown
William M. Burcher
Mel Cannon

November 7, 1980

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GENERAL COUNSEL

Ronald S. Carner
Michael Chetkof
Edwin S. Clare
Anthony Corso
Martin Elman
Jack B. Factor
Thomas Fallon
Richard E. Fish
Richard Gold
Harold Goodstein
Edward W. Jakubowski
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Nicholas A. Sordi, Jr.
Andrew Ullman
Carl Wand
Maurice Weinreb
William Wismann
Thomas Young
Joel Ziegler

Charles N. Steele, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1217

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Enclosed herewith are three copies of the brief which I am submitting. The other ten copies have, with a copy of this letter, been filed with the Secretary of the Commission.

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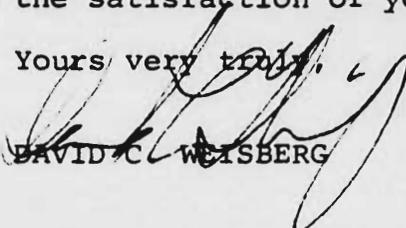
November 6, 1980

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Accordingly, we feel very strongly that this matter should not proceed any further; at least until we have been given a chance to satisfy your office with whatever reasonably can be accomplished. I would sincerely appreciate a reply directed to me so that I may assist in disposing of this matter to the satisfaction of your office.

Yours very truly,


DAVID C. WEISBERG

DCW:pao

cc: Arthur Minardi, Treasurer
Suffolk County Democratic Committee

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BEFORE THE FEDERAL ELECTION COMMISSION
October 7, 1980

In the Matter of)	
)	
Suffolk County Democratic)	
Committee)	MUR 1217
Citizens for Downey)	
Committee to Re-elect)	
Congressman Ambro)	
Citizens for John Randolph)	

BRIEF OF THE SUFFOLK COUNTY DEMOCRATIC COMMITTEE

I. STATEMENT OF THE CASE

Due to ignorance of the law, the Suffolk County Democratic Committee made campaign contributions, as indicated in General Counsel's Brief, subsequent to the filing of a registration statement as a multi-candidate committee, but prior to the waiting period provided under the statute for the making of such contributions after the registration. After the election campaign in 1978, once again, in ignorance of the law, said Suffolk County Democratic Committee, in good faith, filed a termination report showing the contributions made and terminating their account. Subsequent to that time, excess contributions have been recovered from the campaign committees for Downey and Ambro. For the reasons stated in the General Counsel's Brief, no recovery has been able to have been effected from the campaign committee for John Randolph, which no longer exists. General Counsel's Brief fails to reveal that the Suffolk County Democratic Committee is, at the present time, duly registered as a multi-candidate committee and is

83040395390

presently complying with all requirements of the Commission. The registration number for the Committee is C 001 29 593. In addition, General Counsel's Brief does not bring to the attention of the Commission the fact that the Suffolk County Democratic Committee has, at all times, cooperated with the Commission once the alleged violation was brought to its attention and has made all good faith efforts to comply with every request made on behalf of the Commission to rectify the situation. It still stands ready to do so. Numerous requests have been made of the Commission for advice as to how further to proceed and no such advice has been forthcoming. In fact, the only response obtained from recent communications asking for what further steps should be taken by the Suffolk County Democratic Committee were met with the brief of the Commission and a cover letter from General Counsel, dated October 27, 1980, indicating that the Commission was requested to find probable cause.

II. LEGAL ANALYSIS

Pursuant to Section 437g of the Act, the Commission is required to attempt to correct any violation by conciliation agreement. This brief serves as formal notice to confirm all prior notice to the effect that the Suffolk County Democratic Committee has offered, and will continue to offer, to do anything within its power to correct any such violation. In this regard, it should be noted that the Suffolk County Democratic Committee, presently being a duly registered multi-candidate

23040395391

committee, would, apparently, at this time be able to rectify the situation with respect to the Randolph campaign by now making a campaign contribution to the Randolph committee which would be in the form of excusing the indebtedness of the Randolph committee to the Suffolk County Democratic Committee. It should also be noted that the various penalties under the Act only are incurred with respect to knowing and willful violations of the Act. The entire prior history of this matter clearly demonstrate that there was no such knowing or willful violation. In fact, the very information which gave rise to the investigation of the alleged violations in this case, was derived from the reports filed by the Suffolk County Democratic Committee in good faith and which reveal the contributions in question. All that the Suffolk County Democratic Committee awaits is the advice of the Commission as to how it should proceed.

III. CONCLUSION

No further action should be taken with respect to the Suffolk County Democratic Committee until efforts have been made by the staff of the Commission to arrange to correct the violations alleged and unless such corrections are not accomplished due to the acts of the Suffolk County Democratic Committee. It must, once again, be brought to the attention of the Commission that the Suffolk County Democratic Committee has not failed or refused to do anything, whatsoever, which has been requested of

830403953392

it by the staff of the Commission in order to proceed in this matter.

September 7, 1980
Date

David C. Weisberg
DAVID C. WEISBERG
Attorney for Suffolk
County Democratic Committee

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BEFORE THE FEDERAL ELECTION COMMISSION
October 7, 1980

In the Matter of)
)
Suffolk County Democratic) MUR 1217
Committee)
Citizens for Downey)
Committee to Re-elect)
Congressman Ambro)
Citizens for John Randolph)

BRIEF OF THE SUFFOLK COUNTY DEMOCRATIC COMMITTEE

I. STATEMENT OF THE CASE

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9304039537

it by the staff of the Commission in order to proceed in this matter.

November 7, 1980
Date

David C. Weisberg
DAVID C. WEISBERG
Attorney for Suffolk
County Democratic Committee

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Folk County Democratic Law Committee
10 North Ocean Avenue
Patchogue, New York 11772



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Charles N. Steele, General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

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SUFFOLK COUNTY DEMOCRATIC LAW COMMITTEE #2

31 West Main Street
Patchogue, New York 11772

690 # 3352

Telephone
(516) 289-1225

David C. Weisberg
Chairman
Gary N. Weintraub
Associate Chairman

November 7, 1980

- Stanley Amelkin
- John Armentano
- Robert G. Bauer
- Clark Berman
- David H. Besso
- Richard Borda
- John Breslow
Ex-Officio
- Patrick K. Brosnahan, Jr.
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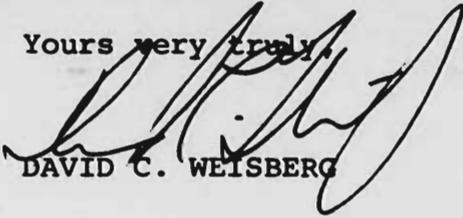
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
Attn: Secretary

Re: MUR 1217

Dear Sirs:

Enclosed herewith are ten copies the the Brief of the Suffolk County Democratic Committee which was requested by the General Counsel of the Commission.

Kindly inform us as to what further steps must be taken to clear up this matter. Thank you.

Yours very truly,

DAVID C. WEISBERG

DCW:pao
Encs.

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BEFORE THE FEDERAL ELECTION COMMISSION
October 7, 1980

In the Matter of)
)
Suffolk County Democratic) MUR 1217
Committee)
Citizens for Downey)
Committee to Re-elect)
Congressman Ambro)
Citizens for John Randolph)

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8 3 0 4 0 3 9 5 4 0 0
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83040395402

it by the staff of the Commission in order to proceed in this matter.

November 7, 1980
Date

David C. Weisberg
DAVID C. WEISBERG
Attorney for Suffolk
County Democratic Committee

83040395403

100 Ocean Avenue
New York, NY 11772



LAW
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MAIL

ATTN: Secretary

911164

600-3285

Citizens for DOWNEY

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October 31, 1980

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

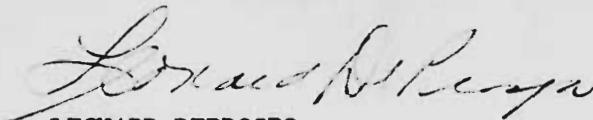
Att: Charles N, Steele

MUR 1217

Dear Mr. Steele:

Please let this serve as notice that the Citizens for Downey Committee is to be represented in all proceedings herein by Mr. Thomas J. Schwarz 919 Third Ave., New York of Skadden, Arps, Meagher, Slate & Flom.

Sincerely.



LEONARD DEPROSPO
Treasurer

LDP:jdp

10 NOV 10 P 2: 00

GENERAL INVESTIGATIVE DIVISION

8304069540

SHADDEN, ARPS, SLATE, MEAGHER & FLOM
818 THIRD AVENUE
NEW YORK 10022



NOV 10 6:13 PM

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

Attention: Victor Sterling

63040393



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO : THE COMMISSION

FROM: MARJORIE W. EMMONS/MARGARET CHANEY *MC*

DATE: OCTOBER 28, 1980

SUBJECT: MJR 1217 - General Counsel's Brief
Memorandum to the Commission dated 10-27-80

The attached documents are circulated for your information.

ATTACHMENTS:
1) Memo; 2) Brief; 3) Letter

33040695407

October 27, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1217

Please have the attached Memo and Brief distributed
to the Commission on an informational basis. Thank you.

83040395408



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 27, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Andrew L. Cisterno, Treasurer
Committee to Re-elect
Congressman Ambro
P.O. Box 832
Huntington, New York 11743

Re: MUR 1217

Dear Mr. Cisterno:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your committee, the Federal Election Commission on July 1, 1980, found reason to believe that your committee may have violated section 441a of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After Considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

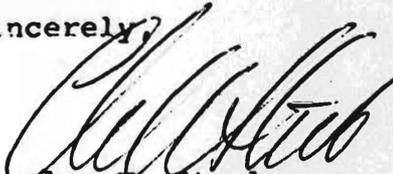
83040395409

Letter to Andrew L. Cisterno
Page two

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Should you have any questions, please contact Victor Sterling at 202-523-4175.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

83040395410

Form 3811, Rev. 11-15-73

1. The following information is required to be shown on the article:

- Show to whom delivered
- Show to whom received
- RESTRICTED (Show to whom)
- RESTRICTED (Show to whom) (CONSULT)

2. ARTICLE ADDRESS
Andrew L. Cisterno

3. ARTICLE DESCRIPTION
REGISTERED NO. 15522

I have received the article described above.

SIGNATURE ADDRESS
[Signature]

4. DATE OF DELIVERY

5. ADDRESS (Complete only if returned)

6. UNABLE TO DELIVER REASON

MUR-1217 Sterling



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 27, 1980

Paul S. Rosen, Treasurer
Citizens for John Randolph
Committee
LaBonne Vie Apts., Bldg. 34C
East Patchogue, New York 11772

Re: MUR 1217

Dear Mr. Rosen:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your committee, the Federal Election Commission on , 1980, found reason to believe that your committee may have violated section of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

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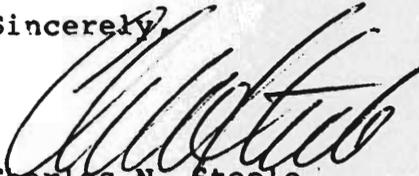
83040395411

Letter to Paul S. Rosen
Page two

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Should you have any questions, please contact Victor Sterling at 202-523-4175.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

83040395412

RM Form 3811, Rev. 10-1-78

1. The following information is being furnished to you:

Show to all persons

Show to [unclear]

RESTRICTED
Show to [unclear]

RESTRICTED
Show to [unclear]

(Complete)

ARTICLE DESIGNATION
Paul S. Rosen

3. ARTICLE DESIGNATION
REGISTERED NO. [unclear]

(Always check)

I have received this [unclear]

SIGNATURE [unclear]

4. DATE OF DELIVERY
10-31-80

5. ADDRESS (Complete only if registered)

6. UNABLE TO DELIVER REASON [unclear]

RETURN RECEIPT REGISTERED, REGISTERED, INSURED AND CERTIFIED MAIL

MUR-1217 Sterling



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 27, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arthur Minardi, Treasurer
Suffolk County Democratic Committee
Half Moon Pond Road
Ridge, New York

Re: MUR 1217

Dear Mr. Minardi:

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83040395410



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 27, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Leonard DeProspero, Treasurer
Citizens for Downey '78
P.O. Box 91P
Bay Shore, New York 11706

Re: MUR 1217

Dear Mr. DeProspero:

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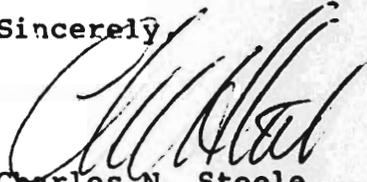
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Letter to Leonard DeProspo
Page two

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Should you have any questions, please contact Victor Sterling at 202-523-4175.

Sincerely



Charles N. Steele
General Counsel

Enclosure
Brief

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1. The following information is shown on the label:

- Show to whom delivered
- Show to whom returned
- RESTRICTED MAIL
- Show to whom returned
- RESTRICTED MAIL
- Show to whom returned

(CONSULT THE POST OFFICE)

2. ARTICLE ADDRESS
Leonard DeProspo

3. ARTICLE DESCRIPTION
REGISTERED NO. 123456

4. I have received the article described above. SIGNATURE Address Registered mail

DATE OF DELIVERY
6/2/88

5. ADDRESS (Name and address)

6. UNABLE TO DELIVER REASON

MUR-1217 Sterling



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION

8000127 P1:42

October 27, 1980

MEMORANDUM TO: The Commission
FROM: Charles N. Steele
General Counsel *CS*
SUBJECT: MUR # 1217

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on October 27, 1980. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letters to Respondents

83040395417

BEFORE THE FEDERAL ELECTION COMMISSION
October 7, 1980

In the Matter of)
)
Suffolk County Democratic)
Committee) MUR 1217
Citizens for Downey)
Committee to Re-elect)
Congressman Ambro)
Citizens for John Randolph)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

The termination report of the Suffolk County Democratic Committee Federal Election Account 1978 disclosed a \$3,000 contribution to Citizens for Downey, a \$3,000 contribution to the Committee to Re-elect Congressman Ambro, and a \$4,000 contribution to Citizens for John Randolph. The reports of these committees disclosed receipt of the contributions.

The Suffolk County Democratic Committee does not qualify as a multi-candidate committee nor is it registered as such. It is affiliated with the New York State Democratic Committee, but that committee is not a multi-candidate committee either.

In response to the Commission's surface violation letter sent October 16, 1979, Citizens for Downey refunded \$2,000 of the contribution on November 6, 1979 and reported the refund in its 1979 year end report.

A surface violation letter was sent to the Committee to Re-elect Congressman Ambro on October 16, 1979. That Committee refunded \$2,000 to the Suffolk County Democratic Committee on November 9, 1979; the refund was reported in its 1979 year end report.

83040395418

Citizens for John Randolph failed to respond to the Commission's surface violation letter dated October 16, 1979. In a subsequent telephone conversation with Reports Analysis Division staff, the Committee's treasurer indicated that the Committee was insolvent and did not have the funds to refund the excess contribution.

On July 1, 1980, the Commission sent letters to all of the respondents indicating that it had found reason to believe that they had violated 2 U.S.C. § 441a and 2 U.S.C. § 441a(f) in making and accepting the contributions. The treasurer of the Suffolk County Democratic Committee responded by telephone indicating that the committee made the contributions because he believed that it qualified as a multicandidate committee. He reiterated that the committee asked for and received refunds from all of the recipients except Citizens for John Randolph. Citizens for Congressman Ambro (formerly Committee to Re-elect Congressman Ambro) responded that it had refunded the excessive contribution and had not intended to violate section 441a. Citizens for John Randolph admitted accepting the \$4,000 contribution in the belief that the Suffolk County Democratic Committee was a multicandidate committee. The candidate and treasurer state that the committee was unable to refund the contribution because the candidate lost the election and the committee became insolvent. Citizens for Downey did not respond to the RTB notification.

II. LEGAL ANALYSIS

Since it is not a multi-candidate committee as defined in 2 U.S.C. § 441a(a)(4), the Suffolk County Democratic Committee

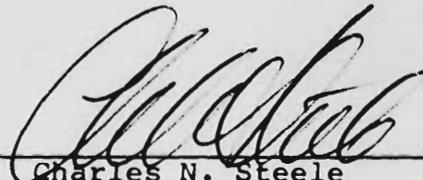
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violated 2 U.S.C. § 441a in making the aforesaid contributions in excess of \$1,000. Citizens for Downey, Committee to Re-elect Congressman Ambro and Citizens for John Randolph violated 2 U.S.C. § 441a(f) in accepting the excessive contributions. Although Citizens for Downey and Committee to Re-elect Congressman Ambro refunded the excess contributions, the violations occurred when the contributions were made and accepted.

III. GENERAL COUNSEL'S RECOMMENDATIONS

Find probable cause to believe that the Suffolk County Democratic Committee violated 2 U.S.C. § 441a(a)(1)(A) and that Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph violated 2 U.S.C. § 441a(f).

24 October 1980
Date



Charles N. Steele
General Counsel

83040395420



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 27, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Andrew L. Cisterno, Treasurer
Committee to Re-elect
Congressman Ambro
P.O. Box 832
Huntington, New York 11743

Re: MUR 1217

Dear Mr. Cisterno:

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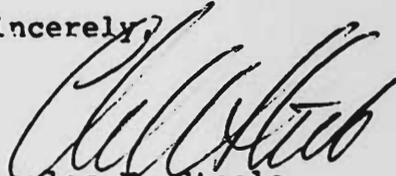
83040395421

Letter to Andrew L. Cisterno
Page two

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Should you have any questions, please contact Victor Sterling at 202-523-4175.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

83040395422



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

October 27, 1980

Paul S. Rosen, Treasurer
Citizens for John Randolph
Committee
LaBonne Vie Apts., Bldg. 34C
East Patchogue, New York 11772

Re: MUR 1217

Dear Mr. Rosen:

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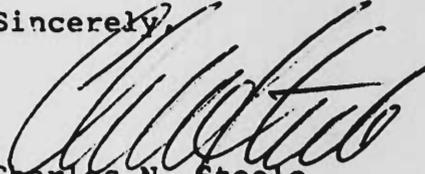
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Letter to Paul S. Rosen
Page two

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Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

83040395424



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 27, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arthur Minardi, Treasurer
Suffolk County Democratic Committee
Half Moon Pond Road
Ridge, New York

Re: MUR 1217

Dear Mr. Minardi:

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83040395422

Letter to Arthur Minardi
Page two

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Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 27, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Leonard DeProspero, Treasurer
Citizens for Downey '78
P.O. Box 91P
Bay Shore, New York 11706

Re: MUR 1217

Dear Mr. DeProspero:

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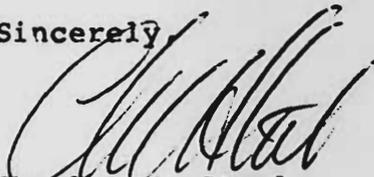
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Letter to Leonard DeProspero
Page two

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Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

83040395428



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MWE*
FROM: MARJORIE W. EMMONS/MARGARET CHANEY *mc*
DATE: SEPTEMBER 17, 1980
SUBJECT: MUR 1217 - Interim Investigative Report #1
dated 9-15-80: Received in OCS 9-15-80,
3:30

The above-named document was circulated to the Commission on a no-objection basis at 11:00, September 16, 1980.

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

83040395429

September 15, 1980

MEMORANDUM TO: Marjorie W. Emons
FROM: Elissa T. Garr
SUBJECT: MUR 1217

Please have the attached Interim Invest Report
distributed to the Commission. Thank you.

83040395430

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

80 SEP 15 P 3: 30

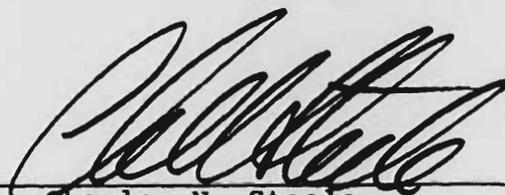
In the Matter of)	
)	
Suffolk County Democratic)	
Committee)	MUR 1217
Citizens for Downey)	
Committee to Re-elect)	
Congressman Ambro)	
Citizens for John Randolph)	

INTERIM INVESTIGATIVE REPORT #1

On July 1, 1980, the Commission found reason to believe that the Suffolk County Democratic Committee violated 2 U.S.C. § 441a and that Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph violated 2 U.S.C. § 441a(f). Letters and notifications of reason to believe were sent to the respondents. Responses have been received from all respondents except Citizens for Downey. A full report and recommendations will be made to the Commission by September 24, 1980.

83040395431

15 Sept 1980
Date



Charles N. Steele
General Counsel

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ACC# 3340

80 AUG 15 P12:16

907702

CITIZENS FOR JOHN RANDOLPH COMMITTEE
August 8, 1980

Mr. Max L. Friedersdorf, Chairman
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1217

80 AUG 15 P4:16

Dear Mr. Friedersdorf:

We are in receipt of your July 10, 1980 correspondence to the treasurer for the Citizens for John Randolph Committee. Said letter indicates a possible violation of certain sections of the Federal Election Campaign Act of 1971. Specifically, a possible violation of 2 U.S.C.-441a.

May I say from the onset that it never once was the intention of the committee, treasurer, or candidate to violate any section of law or regulation.

The Citizens for John Randolph Committee did, in fact, accept a \$4,000 contribution from the Suffolk County Democratic Committee. The Suffolk County Democratic Committee is made up of all the duly elected committeepeople from the 10 towns within Suffolk County. As the population of the County of Suffolk is over 1.3 million people, I can estimate that there are more than 1200 committeepeople. The function of the Suffolk County Democratic Committee is to support and raise funds for all candidates on the democratic line in any given race within the confines of the County.

In 1978, the Executive Board of the County Committee informed the Citizens for John Randolph Committee that a contribution would be made in the amount of \$4,000 and that they were further contributing \$3,000 to two incumbent Congressmen from Suffolk County; namely, Thomas Downey and Jerome Ambro. The County Democratic Committee further indicated that they had made contributions to Congressional candidates from Suffolk County in the past to the degree that they could afford.

As the Suffolk County Democratic Committee is an experienced, viable organization with many entities, including its own legal committee, the contribution was accepted gratefully. It was the direct impression of the Randolph Committee that the Suffolk County Democratic Committee met all the requirements set forth by the Federal Election Commission in that they were a multi-committee supporting entity.

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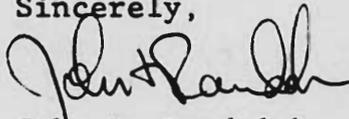
CITIZENS FOR JOHN RANDOLPH COMMITTEE
August 8, 1980

It has come to our attention that both Congressmen Downey and Ambro have since returned the contributions over and above a \$1,000 limit. It must be noted here that both Congressmen Downey and Ambro were reelected, while John Randolph was defeated in his bid for Congress. This is important only in the contents that Messrs. Downey and Ambro could raise funds while retaining the status of incumbents; however, the Citizens for John Randolph Committee did not enjoy that luxury and became insolvent.

We as candidate and treasurer hope this letter clarifies our position in the alleged violation and stand ready to further clarify our position in this matter, if necessary.

Thank you.

Sincerely,



John F. Randolph
Candidate



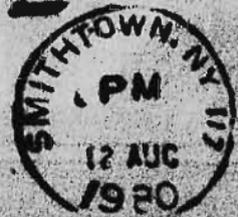
Paul S. Rosen
Treasurer

JFR/msa
cc Victor Sterling, Esq.

B 3 0 4 0 3 9 5 4 3 3

83040390434

Randolph
34C Labonne Via Dr.
E. Patchogue, NY 11772



Mr. Victor Sterling, Esq.
Federal Election Commission
Washington, D.C. 20463

300-2364
RECORDED

OGC

80 AUG 18 P 2: 35

CITIZENS FOR JOHN RANDOLPH COMMITTEE
August 8, 1980

Mr. Max L. Friedersdorf, Chairman
Federal Election Commission
Washington, D.C. 20463

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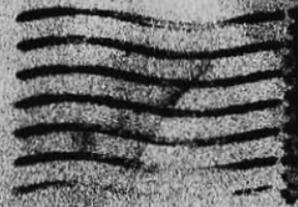
80 AUG 18 2 33 PM

83040595435

8 3 0 4 RECEIVED

80 AUG 18 P 2:

F. Randolph
La Bonne Vie Dr.
Patchogue, New York



Federal Election Commission
Washington, D.C. 20463

ATT: Max L. Friedersdorf

08 AUG 19 4 53

RECEIVED

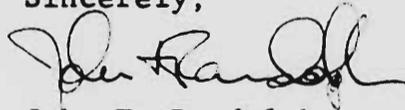
CITIZENS FOR JOHN RANDOLPH COMMITTEE
August 8, 1980

It has come to our attention that both Congressmen Downey and Ambro have since returned the contributions over and above a \$1,000 limit. It must be noted here that both Congressmen Downey and Ambro were reelected, while John Randolph was defeated in his bid for Congress. This is important only in the contents that Messrs. Downey and Ambro could raise funds while retaining the status of incumbents; however, the Citizens for John Randolph Committee did not enjoy that luxury and became insolvent.

We as candidate and treasurer hope this letter clarifies our position in the alleged violation and stand ready to further clarify our position in this matter, if necessary.

Thank you.

Sincerely,



John F. Randolph
Candidate



Paul S. Rosen
Treasurer

JFR/msa
cc Victor Sterling, Esq.

83040595417

RE-ELECT IN
'80
GCC*
8817

Congressman
Jerome A. Ambro

RECEIVED
AUG 5 PM 1:00

July 31, 1980

Federal Election Commission
Washington, D. C. 20463

Re: Citizens For Congressman Ambro
(formerly Committee To Re-elect
Congressman Ambro) FED ID# H.R. 040734
NOR 1217

Attn: Victor Sterling, Esq.

Dear Mr. Sterling:

This will confirm and follow up our discussion of July 15, 1980 with respect to the letter of Mr. Max L. Friedersdorf dated July 10, 1980. The report mentioned in that letter ~~was~~ not enclosed and your follow up correspondence with the enclosure attached was received a few days ago.

I am attaching herewith for your consideration copies of the correspondence which was exchanged upon receipt of a letter dated Oct. 16, 1979 from Mr. Thomas J. Haselhorst, Assistant Staff Director.

My reply of November 9, 1979 to him is also attached along with a copy of the cancelled check reflecting that the sum involved had been returned by this Committee to the Suffolk County Democratic Committee.

It was not the intent of this Committee and I am sure it was not the intent of anyone else to violate, surface or otherwise, 2 U.S.C. 441(a) or any other section of the code controlling campaign activities of any person or committee.

Thank you for bringing this matter to our attention and I hope that this will enable you to terminate this matter.

Respectfully yours,

A. L. Cisternino

Andrew L. Cisternino
Treasurer
Citizens For Congressman Ambro

83040395438

RE-ELECT IN
80

Cor. sman
Jerome A. Ambro

November 9, 1979

Federal Election Commission
Washington, D. C. 20463

Re: Citizens For Congressman Ambro
H. R. 040754
Your reference # 4SV1/79-96LC

Attn: Mr. Thomas J. Haselhorst
Assistant Staff Director

Dear Mr. Haselhorst:

In response to your letter of October 16, 1979, this will advise you that we have on this date returned the sum of \$2000.00 to the Suffolk County Democratic Committee. A copy of our check is enclosed.

We were not aware that the Suffolk Democratic Committee was not a multi-candidate committee, and in accordance with your suggestion, this refund will be reflected in our year end report of receipts and expenditures.

ing
Thank you for bring/ this to our attention.

Sincerely,

A. L. Cisternino

Andrew L. Cisternino
Treasurer

c/c: Suffolk County Democratic Committee
1021 Veterans Memorial Highway
Hauppauge, N.Y. 11787

83040395439

CITIZENS COMMITTEE FOR CONGRESSMAN AMBRO
P. O. BOX 832
HUNTINGTON, N. Y. 11743

1021

Nov. 9 1979 50-1063/31

PAY TO THE ORDER OF

SUFFOLK COUNTY DEMOCRATIC COMMITTEE \$ 2000 ⁰⁰/₁₀₀

TWO THOUSAND &

NO. 100

DOLLARS

Long Island Trust Company
MELVILLE, N. Y.

Refund

Andrew Listerino
Treasurer

⑆ 0214 1063 71⑆ ⑈ 11 38026 ⑈ 21⑈ ⑆0000 200000⑆

83040395410

00006

1-103

PAY BANK
BY TO THE BANK
RECEIVED
DEC 11 1979

DEC

Andrew Listerino

PS Form 3800, Apr. 1976

P05 100000

RECEIPT FOR CERTIFIED MAIL

NO POSTAGE NECESSARY IF MAILED IN THE UNITED STATES

SECTIO
FEC

STREET
WASHN, DC

20463

PC 1798

CERTIFIED FEE

SPEED-AL DELIVERY

REGISTERED MAIL ONLY

83040325441



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1979

Andrew L. Cisterino, Treasurer
Committee to Re-Elect Congressman Ambro
P. O. Box 832
Huntington, NY 11743

Dear Mr. Cisterino:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

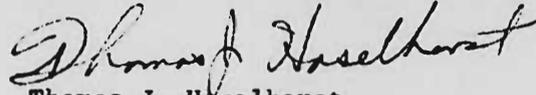
The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

83040395412

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Lorrie Castaneda (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4172.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director

Enclosure

83040395443

ORDER FOR

to the Hon. P. El. Congressman Ambro

P. O. BOX 532 • HUNTINGTON, NEW YORK 11743

83040395M4

FEDERAL ELECTION COMMISSION

Washington, D. C. 20463

Attn: Victor Sterling, Esq.





FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arthur Minardi, Treasurer
Suffolk County Democratic Committee
Half Moon Pond Road
Ridge, New York

Re: MUR 1217

Dear Mr. Minardi:

The Federal Election Commission notified you in a request for additional information letter dated September 21, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code.

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on July 1, 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441a. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,


Max L. Friedersdorf
Chairman

83040395445

8 3 0 4 0 3 9 5 4 4 6

PS Form 3811, Aug. 1976

● 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:
Arthur Minardi, Treas.

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945572	

(Always obtain signature of addressee or agent)

I have received the article described above.

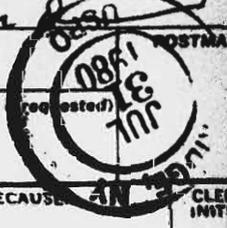
SIGNATURE Addressee Authorized agent

4. [Signature]
DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE AN CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL.



CEA Sterling 1217



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Leonard DeProspero, Treasurer
Citizens for Downey '78
P.O. Box 91P
Bay Shore, New York 11706

Re: MUR 1217

Dear Mr. DeProspero:

The Federal Election Commission notified you in a surface violation letter dated October 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act" or Chapters 95 and 96 of Title 26, U.S. Code.

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on July 1, 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441g. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

Max L. Friedersdorf
Chairman

83040395417

8304039544E

PS Form 3811, Aug. 1978

● 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:
Leonard De Prosio, Treas

3. ARTICLE DESCRIPTION:
 REGISTERED NO. | CERTIFIED NO. | INSURED NO.
 | **945571** | |

(Always obtain signature of addressee or agent)

I have received the article described above.
 SIGNATURE Addressee Authorized agent
Valerie Suber

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS



Sterling

1217

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

U.S. POSTAL SERVICE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 10, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul S. Rosen, Treasurer
Citizens for John Randolph Committee
LaBonne Vie Apts. Bldg. 34C
East Patchogue, New York 11772

Re: MUR 1217

Dear Mr. Rosen:

The Federal Election Commission notified you in a surface violation letter dated October 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code.

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on July 1, 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441a. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

Max L. Friedersdorf
Max L. Friedersdorf
Chairman

83040395419

8 3 0 4 0 3 9 5 4 5 0

PS Form 3811, Aug. 1978

RECEIVED

● **SENDER** Complete items 1, 2, and 3.
Add your address in the RETURN TO 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 ADDRESS TO:**
Paul S. Rosen, Trees.

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>945570</i>	

(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:**

30 JUL 21 PM 12:59

STERLING MUR 1217

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 10, 1980

Andrew L. Cisterno, Treasurer
Committee to Re-elect Congressman
Ambro
P.O. Box 832
Huntington, New York 11743

Re: MUR 1217

Dear Mr. Cisterno:

The Federal Election Commission notified you in a surface violation letter dated October 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code.

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on July 1, 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441a. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

Max L. Friedersdorf
Max L. Friedersdorf
Chairman

83040395451

8 3 0 4 0 3 9 5 4 3 2

PS Form 3811, Aug. 1978

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)

ARTICLE ADDRESSED TO
Andrew L. Cisterno, Treas.

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945569	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE Addressee Authorized agent

Ad Cisterno

4. DATE OF DELIVERY
7-15

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

RECEIVED
JUL 21 PM

POSTMAN
FOR
THE
MOUNTAIN

Sterling

1211

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)	
)	
Suffolk County Democratic)	MUR 1217
Committee)	
Citizens for Downey)	
Committee to Re-elect)	
Congressman Ambro)	
Citizens for John Randolph)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on July 1, 1980, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1217:

1. Find REASON TO BELIEVE that the Suffolk County Democratic Committee violated 2 U.S.C. §441a.
2. Find REASON TO BELIEVE that Citizens for Downey, Committee to Re-Elect Congressman Ambro and Citizens for John Randolph violated 2 U.S.C. §441a(f).
3. Send the letters and notifications of reason to believe findings as attached to the First General Counsel's Report dated June 26, 1980.

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

Attest:

7/1/80
Date

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

83040395453

June 26, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1217

Please have the attached First GC Report distributed
o the Commission on a 48 hour tally basis. Thank you.

8304039545

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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

80 JUN 27 A7: 37

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 6-26-80

MUR# 1217
STAFF MEMBER(S) Sterling

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: Suffolk County Democratic Committee
Citizens for Downey
Committee to Re-elect Congressman Ambro
Citizens for John Randolph

RELEVANT STATUTE: 2 U.S.C. § 441a
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Reports of the respondent committees

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

The Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making excessive contributions to Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph. These committees violated 2 U.S.C. § 441a(f) in accepting the contributions.

FACTUAL AND LEGAL ANALYSIS

The termination report of the Suffolk County Democratic Committee Federal Election Account 1978 disclosed a \$3,000 contribution to Citizens for Downey, a \$3,000 contribution to the Committee to Re-elect Congressman Ambro, and a \$4,000 contribution to Citizens for John Randolph. The reports of these committees disclosed receipt of the contributions.

The Suffolk County Democratic Committee does not qualify as a multi-candidate committee nor is it registered as such. It is affiliated with the New York State Democratic Committee, but that committee is not a multi-candidate committee either.

In response to the Commission's surface violation letter sent October 16, 1979, Citizens for Downey refunded \$2,000 of the contribution on November 6, 1979 and reported the refund in its 1979 year end report.

A surface violation letter was sent to the Committee to Re-elect Congressman Ambro on October 16, 1979. The Committee refunded \$2,000 to the Suffolk County Democratic Committee on November 9, 1979. The refund was reported in its 1979 year end report.

8 3 0 4 0 3 9 5 4 3 5

Citizens for John Randolph failed to respond to the Commission's surface violation letter dated October 16, 1979. In a subsequent telephone conversation with Reports Analysis Division staff, the Committee's treasurer indicated that the Committee was insolvent and did not have the funds to refund the excess contribution.

Since it is not a multi-candidate committee as defined in 2 U.S.C. § 441a(a)(4), the Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making the aforesaid contributions in excess of \$1,000. Citizens for Downey, Committee to Re-elect Congressman Ambro and Citizens for John Randolph violated 2 U.S.C. § 441a(f) in accepting the excessive contributions. Although Citizens for Downey and Committee to Re-elect Congressman Ambro refunded the excess contributions, the violations occurred when the contributions were made and accepted.

RECOMMENDATIONS

1. Find reason to believe that the Suffolk County Democratic Committee violated 2 U.S.C. § 441a.
2. Find reason to believe that Citizens for Downey, Committee to Re-Elect Congressman Ambro and Citizens for John Randolph violated 2 U.S.C. § 441a(f).
3. Send the attached letters and notifications of reason to believe findings.

Attachments

1. Letters (4)
2. Notifications (4)
3. RAD referrals (4)

83040395456



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul S. Rosen, Treasurer
Citizens for John Randolph Committee
LaBonne Vie Apts. Bldg. 34C
East Patchogue, New York 11772

Re: MUR 1217

Dear Mr. Rosen:

The Federal Election Commission notified you in a surface violation letter dated October 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code.

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on _____, 1980, that there is reason to believe that you may have violated 2 U.S.C § 441a. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

83040395457

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1217
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Citizens for John
Randolph

Sterling

202-523-4175

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

BACKGROUND

The Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making excessive contributions to Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph. These committees also violated 2 U.S.C. § 441a in accepting the contributions.

FACTUAL BASIS AND LEGAL ANALYSIS

The termination report of the Suffolk County Democratic Committee Federal Election Account 1978 disclosed a \$3,000 contribution to Citizens for Downey, a \$3,000 contribution to the Committee to Re-elect Congressman Ambro, and a \$4,000 contribution to Citizens for John Randolph. The reports of these committees disclosed receipt of the contributions.

The Suffolk County Democratic Committee does not qualify as a multi-candidate committee nor is it registered as such. It is affiliated with the New York State Democratic Committee, but that committee is not a multi-candidate committee either.

In response to the Commission's surface violation letter sent October 16, 1979, Citizens for Downey refunded \$2,000 of the contribution on November 6, 1979 and reported the refund in its 1979 year end report.

A surface violation letter was sent to the Committee to Re-elect Congressman Ambro on October 16, 1979. The Committee refunded \$2,000 to the Suffolk County Democratic Committee on November 9, 1979. The refund was reported in its 1979 year end report.

Citizens for John Randolph failed to respond to the Commission's surface violation letter dated October 16, 1979. In a subsequent telephone conversation with Reports Analysis Division staff, the Committee's treasurer indicated that the Committee was insolvent and did not have the funds to refund the excess contribution.

83040395458

Since it is not a multi-candidate committee as defined in 2 U.S.C. § 441a(a)(4) the Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making the aforesaid contributions in excess of \$1,000. Citizens for Downey, Committee to Re-elect Congressman Ambro and Citizens for John Randolph violated 2 U.S.C. § 441a in accepting the excessive contributions. Although Citizens for Downey and Committee to Re-elect Congressman Ambro refunded the excess contributions, the violations occurred when the contributions were made and accepted.

Based on the aforesaid, the Commission has found reason to believe that the Suffolk County Democratic Committee, Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph violated 2 U.S.C. § 441a.

83040395459



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Arthur Minardi, Treasurer
Suffolk County Democratic Committee
Half Moon Pond Road
Ridge, New York

Re: MUR 1217

Dear Mr. Minardi:

The Federal Election Commission notified you in a request for additional information letter dated September 21, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code.

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on _____, 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441a. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

83040395460

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1217
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Suffolk County Democratic
Committee

Sterling

202-523-4175

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

BACKGROUND

The Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making excessive contributions to Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph. These committees also violated 2 U.S.C. § 441a in accepting the contributions.

FACTUAL BASIS AND LEGAL ANALYSIS

The termination report of the Suffolk County Democratic Committee Federal Election Account 1978 disclosed a \$3,000 contribution to Citizens for Downey, a \$3,000 contribution to the Committee to Re-elect Congressman Ambro, and a \$4,000 contribution to Citizens for John Randolph. The reports of these committees disclosed receipt of the contributions.

The Suffolk County Democratic Committee does not qualify as a multi-candidate committee nor is it registered as such. It is affiliated with the New York State Democratic Committee, but that committee is not a multi-candidate committee either.

In response to the Commission's surface violation letter sent October 16, 1979, Citizens for Downey refunded \$2,000 of the contribution on November 6, 1979 and reported the refund in its 1979 year end report.

A surface violation letter was sent to the Committee to Re-elect Congressman Ambro on October 16, 1979. The Committee refunded \$2,000 to the Suffolk County Democratic Committee on November 9, 1979. The refund was reported in its 1979 year end report.

Citizens for John Randolph failed to respond to the Commission's surface violation letter dated October 16, 1979. In a subsequent telephone conversation with Reports Analysis Division staff, the Committee's treasurer indicated that the Committee was insolvent and did not have the funds to refund the excess contribution.

83040395461

Since it is not a multi-candidate committee as defined in 2 U.S.C. § 441a(a)(4) the Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making the aforesaid contributions in excess of \$1,000. Citizens for Downey, Committee to Re-elect Congressman Ambro and Citizens for John Randolph violated 2 U.S.C. § 441a in accepting the excessive contributions. Although Citizens for Downey and Committee to Re-elect Congressman Ambro refunded the excess contributions, the violations occurred when the contributions were made and accepted.

Based on the aforesaid, the Commission has found reason to believe that the Suffolk County Democratic Committee, Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph violated 2 U.S.C. § 441a.

83040395462



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Leonard DeProspero, Treasurer
Citizens for Downey '78
P.O. Box 91P
Bay Shore, New York 11706

Re: MUR 1217

Dear Mr. DeProspero:

The Federal Election Commission notified you in a surface violation letter dated October 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act" or Chapters 95 and 96 of Title 26, U.S. Code.

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on , 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441g. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

3 5 0 4 0 3 9 5 4 6 3

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1217
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Citizens for Downey

Sterling

202-523-4175

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

BACKGROUND

The Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making excessive contributions to Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph. These committees also violated 2 U.S.C. § 441a in accepting the contributions.

FACTUAL BASIS AND LEGAL ANALYSIS

The termination report of the Suffolk County Democratic Committee Federal Election Account 1978 disclosed a \$3,000 contribution to Citizens for Downey, a \$3,000 contribution to the Committee to Re-elect Congressman Ambro, and a \$4,000 contribution to Citizens for John Randolph. The reports of these committees disclosed receipt of the contributions.

The Suffolk County Democratic Committee does not qualify as a multi-candidate committee nor is it registered as such. It is affiliated with the New York State Democratic Committee, but that committee is not a multi-candidate committee either.

In response to the Commission's surface violation letter sent October 16, 1979, Citizens for Downey refunded \$2,000 of the contribution on November 6, 1979 and reported the refund in its 1979 year end report.

A surface violation letter was sent to the Committee to Re-elect Congressman Ambro on October 16, 1979. The Committee refunded \$2,000 to the Suffolk County Democratic Committee on November 9, 1979. The refund was reported in its 1979 year end report.

Citizens for John Randolph failed to respond to the Commission's surface violation letter dated October 16, 1979. In a subsequent telephone conversation with Reports Analysis Division staff, the Committee's treasurer indicated that the Committee was insolvent and did not have the funds to refund the excess contribution.

83040395464

Since it is not a multi-candidate committee as defined in 2 U.S.C. § 441a(a)(4) the Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making the aforesaid contributions in excess of \$1,000. Citizens for Downey, Committee to Re-elect Congressman Ambro and Citizens for John Randolph violated 2 U.S.C. § 441a in accepting the excessive contributions. Although Citizens for Downey and Committee to Re-elect Congressman Ambro refunded the excess contributions, the violations occurred when the contributions were made and accepted.

Based on the aforesaid, the Commission has found reason to believe that the Suffolk County Democratic Committee, Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph violated 2 U.S.C. § 441a.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Andrew L. Cisterno, Treasurer
Committee to Re-elect Congressman
Ambro
P.O. Box 832
Huntington, New York 11743

Re: MUR 1217

Dear Mr. Cisterno:

The Federal Election Commission notified you in a surface violation letter dated October 16, 1979, that your committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code.

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on _____, 1980, that there is reason to believe that you may have violated 2 U.S.C. § 441a. A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

83040395466

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1217
STAFF MEMBER(S) & TEL. NO.

RESPONDENT Committee to Re-elect
Congressman Ambro

Sterling

202-523-4175

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

BACKGROUND

The Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making excessive contributions to Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph. These committees also violated 2 U.S.C. § 441a in accepting the contributions.

FACTUAL BASIS AND LEGAL ANALYSIS

The termination report of the Suffolk County Democratic Committee Federal Election Account 1978 disclosed a \$3,000 contribution to Citizens for Downey, a \$3,000 contribution to the Committee to Re-elect Congressman Ambro, and a \$4,000 contribution to Citizens for John Randolph. The reports of these committees disclosed receipt of the contributions.

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A surface violation letter was sent to the Committee to Re-elect Congressman Ambro on October 16, 1979. The Committee refunded \$2,000 to the Suffolk County Democratic Committee on November 9, 1979. The refund was reported in its 1979 year end report.

Citizens for John Randolph failed to respond to the Commission's surface violation letter dated October 16, 1979. In a subsequent telephone conversation with Reports Analysis Division staff, the Committee's treasurer indicated that the Committee was insolvent and did not have the funds to refund the excess contribution.

33040395467

Since it is not a multi-candidate committee as defined in 2 U.S.C. § 441a(a)(4) the Suffolk County Democratic Committee violated 2 U.S.C. § 441a in making the aforesaid contributions in excess of \$1,000. Citizens for Downey, Committee to Re-elect Congressman Ambro and Citizens for John Randolph violated 2 U.S.C. § 441a in accepting the excessive contributions. Although Citizens for Downey and Committee to Re-elect Congressman Ambro refunded the excess contributions, the violations occurred when the contributions were made and accepted.

Based on the aforesaid, the Commission has found reason to believe that the Suffolk County Democratic Committee, Citizens for Downey, Committee to Re-elect Congressman Ambro, and Citizens for John Randolph violated 2 U.S.C. § 441a.

83040395468

D.669

MEMORANDUM

March 24, 1980

TO: Charles Steele

THROUGH: Orlando B. Potter

FROM: TOM HASELHORST

SUBJECT: SUFFOLK COUNTY DEMOCRATIC COMMITTEE FEDERAL ELECTION ACCOUNT 1978
 CITIZENS FOR DOWNEY '78 NY/2
 COMMITTEE TO RE-ELECT CONGRESSMAN AMBRO NY/3
 CITIZENS FOR JOHN RANDOLPH NY/2

Please note that the attached referrals for the above mentioned committees are concerned with the same transaction and should be reviewed and handled simultaneously.

83040395469

REPORTS ANALYSIS REFERRAL SHEET

DATE March 24, 1980 ANALYST Dug Greovy
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW RS/ET
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Suffolk County Democratic Committee Federal
 TREASURER: Election Account 1978
 ADDRESS: Arthur Minardi, Treasurer
Half Moon Pond Road
 AFFILIATE(S): Ridge, NY

ALLEGATION(S): Excessive Contribution Made to Candidates for Federal Office CITE: 2 U.S.C. 441a ATTACHMENT(S): 3

DATE INITIATED: 10/16/79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other: ATTACHMENT
 Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 3/2/78 TO 11/28/78

TOTAL RECEIPTS \$ 14,200 TOTAL EXPENDITURES \$ 14,200

CASH ON HAND \$ 0 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: ATTACHMENT
 Request for Additional Information, 9/21/79, Termination Report 2
 3SV1/79-148, 10/16/79, Termination Report 3
 Second Notice for RFAI of 9/21/79 4

Note: Attachments 2 and 4 are not relevant to allegations above
 COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
 Telecon: Greovy with Brosnahan, 11/5/79 5
 Telecon: Greovy with Brosnahan, 12/20/79 6

Note: It is not clear in what capacity Brosnahan is representing the committee
 Response of 1/29/80 indicates that Brosnahan is Special Counsel.

REASON(S) FOR REFERRAL: ATTACHMENT
 Response to 3SV1/79-148, received 1/29/80 7
 Amounts of excessive contributions meet RAD threshold for OGC review.
 Note: No refund has been made by Committee to Elect John Randolph, as of 1/29/80

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
 None

OTHER RELEVANT INFORMATION: ATTACHMENT
 Committee's Form 1 and Form 3 (Termination) were received 4/9/79.
 Committee stated in Form 1 that Minardi was the only officer of the committee.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
 None

83040395470



FEDERAL ELECTION COMMISSION

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

SEP 21 1978

Arthur Minardi, Treasurer
Suffolk County Democratic Committee-
Federal Election Account 1978
Half Moon Pond Road
Ridge, NY

Dear Mr. Minardi:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the Termination Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

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SEP 21 1979

10: Suffolk County Democratic Committee-
Federal Election Account-1978

DATE: _____
I.D. NO.: C00108944

REQUEST FOR ADDITIONAL INFORMATION FOR THE Termination REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 3/2/78 THROUGH 11/28/78,
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

0
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- Coverage Dates: omitted or incorrect
- Summary Page Line(s): Column(s): Totals: omitted or incorrect
- Detailed Summary (Page 2) Line(s): Column(s): Totals: omitted or incorrect
- Schedule Totals: disagree with Detailed Summary (Page 2) or omitted
- Date(s): omitted or inadequate for Schedule(s) Line(s)
- Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s)
- Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s)
- Election Designation: omitted or inadequate for Schedule(s) Line(s)
- Aggregate Year-to-Date Totals: omitted or inadequate for Schedule(s) Line(s)
- Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) Line(s)
- Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s)
- Inadequate Description of: proceeds dates events location of Schedule
- Signature: omitted inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

Other: The committee has reported receipts from a fundraising event. However, no
expenditures for the event have been disclosed. Please provide the circumstances for this
discrepancy, and state who paid for the event and in what amount(s)

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party). 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1979

Arthur Minardi, Treasurer
Suffolk County Democratic Committee-
Federal Election Account 1978
Half Moon Pond Road
Ridge, New York

Dear Mr. Minardi:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the Termination Report of Receipts and Expenditures, we noticed entries indicating that you have made contributions which exceed the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes individuals and political committees, other than multicandidate political committees, from making political contributions to a candidate for Federal office in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered with the Commission for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office.

The Commission recommends that if you have made contributions in excess of the limits set forth in the Act that you notify the recipients and request refunds of the amounts in excess of \$1,000. By separate letters to the recipients we have recommended that such refunds be made upon confirmation from you that the contributions were in excess of the limits. These returns should be reported immediately by letter and should be reflected as refunds on your next report of receipts and expenditures. If you find that the entries in question are incomplete or incorrect, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report of receipts and expenditures.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact David Greevy (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director

Enclosure

CRS

33040395474

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Line Number _____

(Use Separate Schedules for
each numbered line)

Commission
A.W.
C. 20463

Name of Candidate or Committee in Full

Suffolk County Democratic Committee Federal Election Account 1974

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Committee to Elect John Roush c/o John Roush Brookhaven Aull, Port Hope, N.Y.	Donation 00095299 Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	11/20/76	\$4,000
Committee to Re-Elect Congressman Adams c/o James Adams / House of Representatives Washington, D.C.	Donation 00050864 Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	11/21/76	\$3,000
Committee to Re-Elect Congressman Downey c/o Thomas Downey / House of Representatives Washington, D.C.	Donation 00051126 Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10/31/76	\$3,000
Suffolk County Democratic Comm. Veterans Memorial Highway Amherst, N.Y.	Donation Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	11/26/76	\$4,200
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			\$ 14,200
TOTAL this period (last page this line number only)			\$ 14,200

Telecon:

Greevy with Kevin Brosnahan
Suffolk County Democratic Committee Federal Election Account 1978
11/5/79
3SV1/79-148 & RFAI
516/661-8631 or 516/661-8777 (Congressman Downey's Office)

KB called today. He originally asked to talk to Lorrie Castaneda about the letter received by Downey on the same matter. She realized after talking with him for a moment that he was calling on behalf of the committee above. I took the call at that point.

He asked how the committee could qualify as a multicandidate committee, thereby taking care of the problem. I stated that the committee could not qualify at this time and have that apply to the contributions made in '78.

He asked what should be done. I stated that he should receive the required refunds from the candidates, i.e. \$3,000 from Randolph, and \$2,000 from Ambro and from Downey.

He wanted to know if there was any way that the committee could then give the money back to the candidates, as he didn't think it was right for the committee to ask for the refunds after such a long period of time.

I stated that the committee may be able to make \$1,000 contributions to the candidates next year for each election, i.e. primary and general. As such, the contributions would have to be clearly designated for the specific elections, and were the candidate(s) not to run in the general election, a refund would then probably be required for the \$1,000 attributed to the general election.

He said he understood this and that the committee would probably do this. As they have terminated, he will establish a new Federal committee to report the receipt of the refunds, and to make the contributions. I told him that that committee would have to qualify independently of the committee registered last year. (Note: We earlier discussed the possibility that the committee last year may have been affiliated with a multicandidate committee, but he determined that it was not)

He asked about the RFAI sent. I told him that I would review the file and get back in touch. I called him about 30 minutes later.

I stated that the point of the RFAI was to determine if any other account(s) or committee(s) had paid for the fundraiser, thereby providing an in-kind contribution to the registered account. He stated that another account did pay the expenses, but that the \$4,200 transfer made on 11/28/78 to the State account was for the purposes of reimbursing for the fundraiser and of providing the State account with other funds. He will indicate this in a letter.

We returned the conversation to the 441a problems. He stated that there was no problem with Downey and Ambro as far as making the refunds. He stated that Randolph would be a problem however because his committee had terminated and he would not be running for Congress again.

83040395476

Telecon-continued

Suffolk County Democratic Committee
11/5/79

He stated that he knew that Randolph didn't have any money left over from the campaign and he asked what should be done. I stated that for purposes of compliance, we are expecting a refund to his committee from Randolph's committee in the amount of \$3,000.

He stated that that could not be done. I stated that we deal with committees at this stage to attempt to gain compliance. If compliance is not gained, the matter could be referred to OGC to attempt to gain compliance.

He stated that Randolph is in a local election tomorrow, and that his state election committee may have the funds. He stated that that probably would not be a good thing to do though, i.e. make the refund from that campaign. I suggested only that Randolph call Lorrie about the problem.

He said finally that we would hear from the committee shortly.

83040395477



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

3-2-78

December 20, 1979

11-28-78

Arthur Minardi, Treasurer
Suffolk County Democratic Committee - Federal
Election Account 1978
Half Moon Pond Road
Ridge, NY

REFERENCE: Termination Report

Dear Mr. Minardi:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated September 21, 1979. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with provisions of the Federal Election Campaign Act (the Act).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you should have any questions related to this matter, please contact David Greevy on our toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

83040395478

Telecon:

Greevy with Kevin Brosnahan
Suffolk County Democratic Committee
12/20/79
516-661-8631

Please note that I called Downey's office (516/661-8777) and was informed that KB does not work there.

I called KB to ask him what the status was regarding the excessive contributions made to Ambro, Downey, and Randolph by the committee.

He stated that the committee received refunds from Ambro and Downey. He stated further that Randolph's campaign has no money and that Randolph lost a local election in November, so he's probably further in debt.

I told KB that we would like to have a letter regarding the current status of the situation, i.e. refunds received for Ambro and Downey, and a statement regarding any requests made by the committee to Randolph for the refund.

I asked specifically if the committee had requested the refund from Randolph. KB stated that he would have to call back next week as he's been quite busy with plans for delegate selection and other matters, and he was hoping to work on this matter on Saturday.

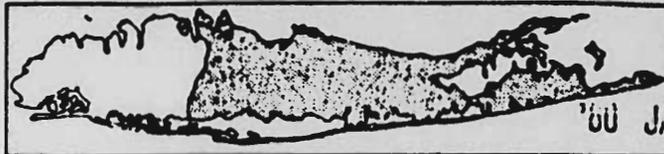
He agreed to call Thursday next.

I told him again that we should have a letter as soon as possible regarding the current status of the matters.

83040395479

1021 Veterans Memorial Highway, Hauppauge, N.Y. 11787

Dominic J. Baranello
Chairman



Tel. (516) 979-9400

'80 JAN 29 PM 12 04

January 11, 1980

Mr. David Greevy
Federal Election Commission
Washington, D. C. 20463

Refer: 3SV1/79-148

Dear Mr. Greevy:

In response to your letter of September 21, 1979, please be advised that the Suffolk County Democratic Committee special account #2 was financed by a dinner dance held in the Spring of 1978 and that the monies shown on the report previously filed, were refunded to the Suffolk County Democratic Committees' general account, constituting the pro-rated cost for expenses incurred for the dinner and publicity attended thereto.

Please be advised that Congressman Thomas Downey's Campaign Committee has forwarded a check for \$2,000.00 to the Suffolk County Democratic Committee, pursuant to your directive. (Copy of check is enclosed) Congressman Jerome Ambro has also returned \$2,000.00, per your instructions.

I would appreciate your keeping me advised as to the status regarding Mr. John Randolph.

If I can be of any further assistance, please do not hesitate to call upon me.

Very truly yours,

Patrick Kevin Brosnahan

PATRICK KEVIN BROSNAHAN, JR.
Special Counsel

PKB/kd

cc: Dominic Baranello
Arthur Minardi
Congressman Downey
Congressman Ambro

33040395480

BRANTINGTON, N. Y. 11743

NOV. 9 19 79 50-1061/21

FOLK COUNTY DEMOCRATIC COMMITTEE 2000.00
THOUSAND 9/100 DOLLARS

Land Trust Company
MELVILLE, N. Y.

Andrew S. Isterino
Treasurer

⑆021410637⑆ ⑈11⑈38086⑈2⑈

3304050548

CITIZENS FOR DOWNEY "78" 620

11/6 19 79 50-903/214

PAY TO THE ORDER OF Suffolk Democratic Party 2000.00
Two Thousand 00/100 DOLLARS

MANUFACTURERS HANOVER TRUST COMPANY
120 WEST MAIN STREET
BAY SHORE, N.Y. 11706

MEMO Leonard DePina

⑆021409033⑆ ⑈01⑈162730⑈01⑈

1021 Veterans Memorial Highway, Hauppauge, N.Y. 11787

Dominic J. Baranello
Chairman



Tel. (516) 979-9400

January 8, 1980

Mr. John Randolph
14 Foxcroft Lane
East Patchogue, N.Y. 11772

Dear John:

As per the committee's previous conversations with you, please be advised that the Suffolk County Democratic Committee has been informed by the Federal Election Commission that the special account #2 contribution was in excess of the contribution limitation. Accordingly, you are again advised that we hereby request re-payment in the sum of \$3,000.00.

This contribution made by the Suffolk County Democratic Committee to you was for the 1978 campaign for Congress in the 1st Congressional District.

We would appreciate your advising us as to your arrangements for re-payment.

Very truly yours,

A handwritten signature in cursive script that reads "Patrick Kevin Brosnahan, Jr.".

PATRICK KEVIN BROSNAHAN, JR.
Special Counsel

PKB:bgo

cc: Federal Election Commission
Dominic J. Baranello
Arthur Minardi

REPORTS ANALYSIS REFERRAL SHEET

DATE _____ ANALYST Ed Ryan EDR
 TO: Office of General Counsel TEAM CHIEF Peter Kell, Jr. PKJ
 THROUGH: STAFF DIRECTOR QJ COMPLIANCE REVIEW Bowen/Sims
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS TH

CANDIDATE/COMMITTEE: Committee to Re-Elect Congressman Ambro NY/03 C00050864
 TREASURER: Andrew L. Cisternino
 ADDRESS: P.O. Box 832
 Huntington, New York 11743

AFFILIATE(S): N/A
 ALLEGATION(S): Excessive contribution from Non-Qualified Committee CITE: 2 U.S.C. 441(a) ATTACHMENT(S) #2

DATE INITIATED: 10-10-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other: ATTACHMENT
 Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-1-78 TO 10-23-78

TOTAL RECEIPTS \$ 16,975.57 TOTAL EXPENDITURES \$ 20,303.71

CASH ON HAND \$ 4223.49 DEBTS \$ -0-

HISTORY:

RESULTS OF REVIEW: Surface Violation letter for the 10 Day Pre-General Election Report sent 10-16-79. . . . ATTACHMENT #3
 Adequate response received 11-9-79. . . . ATTACHMENT #4
 Refund disclosed on Year End 1979 Schedule B, filed on 1-15-80 ATTACHMENT #5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
 N/A

REASON(S) FOR REFERRAL: ATTACHMENT
 Meets division threshold for referral.

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
 N/A

OTHER RELEVANT INFORMATION: ATTACHMENT
 Refer to the Downey referral
 " " " Randolph "
 " " " Suffolk County Democratic Committee referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
 N/A

3304039543

8 3 2 4 0 3 2 5 4 3 5
 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1977-1978

DATE LISTED 1

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CITIZENS FOR CONGRESSMAN AMBRO								
	STATEMENT OF ORGANIZATION- AMENDMENT					14JAN77		ID# C00050844 1 76HSE/118/5208
	STATEMENT OF ORGANIZATION- AMENDMENT					13SEP77		3 77HSE/125/1052
4/78	48 HOUR CONTRIBUTION NOTICE					25OCT78		1 78HSE/151/2781
	48 HOUR CONTRIBUTION NOTICE					26OCT78		2 78HSE/154/0416
	48 HOUR CONTRIBUTION NOTICE					27OCT78		1 78HSE/151/4023
	48 HOUR CONTRIBUTION NOTICE					30OCT78		1 78HSE/154/0444
	48 HOUR CONTRIBUTION NOTICE					3NOV78		1 78HSE/155/0706
	48 HOUR CONTRIBUTION NOTICE					3NOV78		1 78HSE/154/4743
	48 HOUR CONTRIBUTION NOTICE					4NOV78		1 78HSE/155/0245
	48 HOUR CONTRIBUTION NOTICE					6NOV78		1 78HSE/155/0721
	APRIL 10 QUARTERLY		100		2,576	1JAN78 -31MAR78		3 78HSE/132/1157
	JULY 10 QUARTERLY		14,942		9,875	1APR78 -30JUN78		13 78HSE/140/1659
	REQUEST FOR ADDITIONAL INFORMATION					1APR78 -30JUN78		2 78FEC/084/0129
	JULY 10 QUARTERLY - AMENDMENT					1APR78 -30JUN78		7 78HSE/145/3325
	JULY 10 QUARTERLY - AMENDMENT					1APR78 -30JUN78		8 78HSE/146/1707
	OCTOBER 10 QUARTERLY		20,756		26,491	1JUL78 -30SEP78		14 78HSE/147/0051
	30 DAY PRE-GENERAL		16,975		20,303	1OCT78 -23OCT78		13 78HSE/154/0403
	30 DAY POST-GENERAL		13,661		17,049	24OCT78 -27NOV78		15 78HSE/155/4530
	YEAR END REPORT		459		410	28NOV78 -31DEC78		5 79HSE/160/1042
	YEAR END REPORT - AMENDMENT					28APR78 -31DEC78		2 79HSE/170/1228
1977	APRIL 10 QUARTERLY		1,411		365	1JAN77 -31MAR77		4 77HSE/121/4857
	JULY 10 QUARTERLY		7,725		1,012	1APR77 -30JUN77		11 77HSE/123/4663
	OCTOBER 10 QUARTERLY		2,800		1,010	1JUL77 -30SEP77		7 77HSE/126/3691
	YEAR END REPORT					1OCT77 -31DEC77		4 78HSE/128/2550
	TOTAL	420	78,829	1,165	79,091			121 TOTAL PAGES



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1979

Andrew L. Cisterino, Treasurer
Committee to Re-Elect Congressman Ambro
P. O. Box 832
Huntington, NY 11743

Dear Mr. Cisterino:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

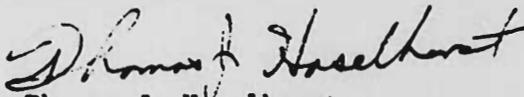
The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

83049A92569

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Lorrie Castaneda (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4172.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director

Enclosure

838034034954370

RE-ELECT IN '80

Congressman
Jerome A. Ambro

NOV 9 1979
CERTIFIED MAIL
November 9, 1979

NOV 10 1979

Federal Election Commission
Washington, D. C. 20462

Re: Citizens For Congressman /
H. I. 040754
Your reference # 45V1/79-90
Attn: Mr. Thomas J. Jeselherst
Assistant Staff Director

U.S. HOUSE OF REPRESENTATIVES
979 NOV 16 PM 12:21

7 8 3 9 4 9 3 0 5 4 3 8

Dear Mr. Jeselherst:

In response to your letter of October 16, 1979, this will advise you that we have on this date returned the sum of \$2000.00 to the Suffolk County Democratic Committee. A copy of our check is enclosed.

We were not aware that the Suffolk Democratic Committee was not a multi-candidate committee, and in accordance with your suggestion, this refund will be reflected in our year end report of receipts and expenditures.

Thank you for bring/this to our attention.

Sincerely,
A. L. Cisternino

Andrew L. Cisternino
Treasurer

c/c: Suffolk County Democratic Committee
1021 Veterans Memorial Highway
Hauppauge, N.Y. 11787

~~CITIZENS COMMITTEE TO REPEAL~~
FOR CONGRESSMAN AMBRO
P. O. BOX 832
HUNTINGTON, N. Y. 11743

1021

Nov. 9 1979^{NOV 10 1979}

PAY TO THE
ORDER OF

SUFFOLK COUNTY DEMOCRATIC COMMITTEE 2000 ⁰⁰/₁₀₀

TWO THOUSAND & ^{NO 100}/₁₀₀ DOLLARS

Long Island Trust Company
MELVILLE, N. Y.

Refund

Andrew J. Listernino
Treasurer

⑆021410637⑆ ⑆1⑆36086⑆2⑆

1 80 30 01 41 0 7 9 5 4 3 5

SCHEDULE B
REVISED
 January, 1974
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20543

ITEMIZED EXPENDITURES
 (Operating, Transfer Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 3 of 3 for
 Line Number 21(B)
 Use Separate Schedules for
 each numbered line

Name of Candidate or Committee in Full CITIZENS FOR CONGRESSIONAL AGENCIES			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of cash expended this period
Suffolk County Democratic Committee Veterans Memorial Highway Saugerties, N.Y.	Refund Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	11/9/79	\$2000.00 Agg. \$2000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of cash expended this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of cash expended this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of cash expended this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of cash expended this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of cash expended this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of cash expended this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of cash expended this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other	Date (month, day, year)	Amount of cash expended this period
SUBTOTAL of expenditures this page (optional).....			\$ 2000.00
TOTAL this period (last page this line number only).....			\$ 2000.00

33040395490
 8001711668

REPORTS ANALYSIS REFERRAL SHEET

DATE _____ ANALYST Ed Ryan *EDR*
 TO: Office of General Counsel TEAM CHIEF Peter Kell, Jr.
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW Bowen/Sims
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS

CANDIDATE/COMMITTEE: Citizens for Downey 78 NY/02 C00086215
 TREASURER: Leonard De Prospe
 ADDRESS: P.O. Box 91P
 Bay Shore, New York 11706

AFFILIATE(S):
 N/A
 ALLEGATION(S): Excessive CITE: 2 U.S.C. 441a(A) ATTACHMENT(S)
 contribution from non-qualified #2
 committee.

DATE INITIATED: 10-10-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other: ATTACHMENT
 Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-24-78 TO 11-27-78
 TOTAL RECEIPTS \$ 20,446.83 TOTAL EXPENDITURES \$ 18,316.01
 CASH ON HAND \$ 5,958.27 DEBTS \$ 17,774.02

HISTORY:

RESULTS OF REVIEW: Surface violation letter for the 30 ATTACHMENT
 Day Post General Election report sent 10-16-79, #3
 Adequate response received 11-8-79. #4
 Refund disclosed 11-6-79 on the Year End 1979 report, filed #5
 1-15-80 (Schedule B).

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
 N/A

REASON(S) FOR REFERRAL: ATTACHMENT
 Meets division threshold for referral

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
 N/A

OTHER RELEVANT INFORMATION: ATTACHMENT
 Refer to Ambro's referral

" Suffolk County Democratic Committee referral
 " Randolph's referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

83040395471

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSED DOCUMENTS - (C) (77-78)

DATE: FEB 80

1

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CITIZENS FOR DOWNEY								
	1978 STATEMENT OF ORGANIZATION					27/JAN/78	3	78HSE/128/4979
	APRIL 10 QUARTERLY	5,557		5,285		1/JAN/78-31/MAR/78	8	78HSE/132/4775
	APRIL 10 QUARTERLY - AMENDMENT						1	78HSE/137/1296
	60 DAY PRE-PRIMARY	12,595		13,398		1/JUL/78-28/AUG/78	15	78HSE/144/1670
	60 DAY PRE-PRIMARY - AMENDMENT					1/JUL/78-28/AUG/78	1	78HSE/148/2218
	JULY 10 QUARTERLY	32,369		28,214		1/APR/78-30/JUN/78	24	78HSE/140/1068
	JULY 10 QUARTERLY - AMENDMENT					1/APR/78-30/JUN/78	1	78HSE/142/3395
	REQUEST FOR ADDITIONAL INFORMATION					1/APR/78-30/JUN/78	3	78FEC/084/3534
	JULY 10 QUARTERLY - AMENDMENT					1/APR/78-30/JUN/78	2	78HSE/146/0594
	OCTOBER 10 QUARTERLY		16,554		16,750	29/AUG/78-30/SEP/78	18	78HSE/150/20
	REQUEST FOR ADDITIONAL INFORMATION					29/AUG/78-30/SEP/78	3	78FEC/096/28
	REQUEST FOR ADDITIONAL INFO 2ND					30/SEP/78	1	79FEC/123/1121
	OCTOBER 10 QUARTERLY - AMENDMENT		16,554		16,750	29/AUG/78-30/SEP/78	3	79HSE/162/4513
	60 DAY PRE-GENERAL		13,862		13,462	1/OCT/78-23/OCT/78	20	78HSE/151/3942
	60 DAY POST-GENERAL		20,446		18,316	24/OCT/78-27/NOV/78	19	78HSE/158/3715
	REQUEST FOR ADDITIONAL INFORMATION					24/OCT/78-27/NOV/78	3	79FEC/122/0934
	REQUEST FOR ADDITIONAL INFORMATION					24/OCT/78-27/NOV/78	2	79FEC/140/2557
	60 DAY POST-GENERAL - AMENDMENT					24/OCT/78-27/NOV/78	2	79HSE/170/1223
	YEAR END REPORT		738		0	28/NOV/78-31/DEC/78	8	79HSE/161/1881
	TOTAL	50,521	51,600	46,897	48,528		137	TOTAL PAGES

OMB No. 1545-0045
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20003

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 2 of 2 for
 Line Number _____

(Use Separate Schedules for
 each numbered line)

18011583792
 33040595492

Name of Candidate or Committee in Full Citizens for Downey '78			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
NY Telephone (Federal Political Action Comm.) 1095 Avenue of Americas NY, NY	18K C00101717 Occupation non-affiliated	11/4/78	100.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	
Podiatry PAC 20 Chevy Chase Circle Washington, DC 20006	18K C00004839 Occupation Non-affiliated	10/30/78	500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 700.00	
Special Political Agricultural Comm. 609 Portland Bldg. 200 Broadway, Louisville, Kentucky	Ed. 18K C00003772 Occupation non-affiliated	10/26/78	200.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00	
Suffolk County Democratic Campaign 941 Patchogue-Holbrook Road Holbrook, NY	Spec. Acc't. #2 18K C00073346 Occupation non-affiliated	11/6/78	3000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 3000.00	
Jim Wright Majority Congress Committee PO Box 231 Rockville, Md	18K C00078410 Occupation non-affiliated	11/3/78	500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1500.00	
Truck Operators Non Partisan Committee 4301 St. SE, Washington, DC	18K C00002881 Occupation non-affiliated	10/26/78	250.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00	
International Union of Electrical Radio, and Machine Workers- COPE 875 Murray Hill Pkwy, E. Rutherford, NJ	18K U Occupation non-affiliated	11/2/78 11/2/78	300.00 20.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 320.00	
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$ 10370.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1979

Leonard De Prospro, Treasurer
Citizens for Downey '78
P. O. Box 91P
Bay Shore, NY 11706

Dear Mr. De Prospro:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 30 Day Post General Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

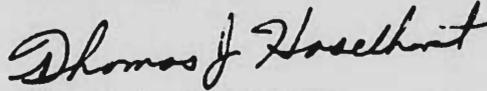
The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

87390043013490524557

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Lorrie Castaneda (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4172.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director

Enclosure

8739043013190524550

TOM DOWNNEY

congressman

NOV 8 1979
REGULAR MAIL

035602

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

Re: 4SV1/79-97LC

Dear Sir:

Enclosed please find copy of check in the amount of \$2000.00 that the committee has returned to the Suffolk County Democratic Committee as per your letter of October 16, 1979.

At the time of the contribution, this committee was unaware that they were not an official multicandidate committee.

The transaction will be shown on our next report.

Sincerely,

Leonard DeProspero
Leonard DeProspero
Treasurer

1979 NOV 14 PM 12:25
HOUSE OF REPRESENTATIVES

LDP:jdp
Enc.

83001410730915042.6

18394089592

CITIZENS FOR DOWNEY #78

620

50-903/214

11/15 1977

PAY TO THE ORDER OF

Jeffrey L. Davis - in full \$2000.00
John Thompson DOLLARS



MANUFACTURERS HANOVER
TRUST COMPANY
120 61 ST MANHATTAN
NEW YORK, N.Y. 10020

MEMO

⑆02⑆409033⑆ ⑆0⑆ 162730⑆0⑆

Form 278
 1978
 U.S. Election Commission
 1200 K Street, N.W.
 Washington, D.C. 20005

ITEMIZED EXPENDITURES
 (Operating, Transfer Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Model
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FBC FORM 8)

Page 2 of 2
 Line Number 221
 Use Separate Schedules for
 each numbered line

7-800-800-1171-2517

Name of Candidate or Committee in Full			
CITIZENS FOR DORNEY '78			
Full Name, Mailing Address and ZIP Code	Portion of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Wynne Prospect Election Committee 43 Scard Ave. Dix Hills, N.Y. 11746	donation Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10/9/79	\$0.00
Norman Peyser Committee 713 Highbridge Rd. North Babylon, N.Y. 11702	donation Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10/9/79	\$0.00
Eugene Reed Election Committee 610 Albany Ave. Amityville, N.Y. 11701	donation Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10/9/79	\$0.00
Committee to Elect Feldman Dix Hills, N.Y. 11746	donation Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10/9/79	\$00.00
Suffolk County Democratic Committee Veterans Memorial Highway Massapequa, N.Y.	tickets return as per attached Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	10/9/79 11/6/79	100.00 2000.00
SUBTOTAL of expenditures this page (optional).....			\$
TOTAL this period (last page this line number only).....			\$ 3675.00

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

D
RAD 906-17

REPORTS ANALYSIS REFERRAL SHEET

DATE March 22, 1980 ANALYST Ed Ryan EDR
TO: Office of General Counsel TEAM CHIEF Peter Kell, Jr. PKJ
THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW Bowen/Sims
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS TAH

CANDIDATE/COMMITTEE: Citizens for John Randolph Committee NY/02 C00095299
TREASURER: Paul S. Rosen
ADDRESS: La Bonne Yfe Apts. Bldg. 34C
East Patchogue, New York 11772

AFFILIATE(S):
N/A

ALLEGATION(S): Excessive contribution from a Non-qualified committee CITE: 2 U.S.C. 441a(a) ATTACHMENT(S)
#2

DATE INITIATED:

10-10-79

MANNER IN WHICH REVIEW WAS INITIATED:

Normal Review Other:
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-3-78 TO 10-23-78

TOTAL RECEIPTS \$ 23,294.52 TOTAL EXPENDITURES \$ 15,043.62
CASH ON HAND \$ 13,161.62 DEBTS \$ " " by Cmte. 3,500.00
Debts owed to Cmte. 3,000.00

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Surface violation letter for the 10 Day Pre-Election Report sent 10-16-79.

#3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon 12-05-79
Telecon 12-20-79

#4
#5

REASON(S) FOR REFERRAL:

ATTACHMENT

No response to Surface Violation Notice; Excessive contribution has not been refunded; and meets RAD threshold for referral

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

N/A

OTHER RELEVANT INFORMATION:

ATTACHMENT

Refer to Ambro's referral
" " Downey's " "
" " Suffolk County Democratic Committee referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

8304039549e

83040395501

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) 1977-1978DATE 14FEB
PAGE 1

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CITIZENS FOR JOHN F. RANDOLPH COMMITTEE								ID# C00095299
1978	STATEMENT OF ORGANIZATION					15MAY78	3	78HGE/136/0224
	STATEMENT OF ORGANIZATION- AMENDMENT					26MAY78	3	78HGE/136/2609
	48 HOUR CONTRIBUTION NOTICE					31OCT78	1	78HGE/154/2110
	48 HOUR CONTRIBUTION NOTICE					3NOV78	1	78HGE/154/4916
	48 HOUR CONTRIBUTION NOTICE					9NOV78	1	78HGE/155/1438
	48 HOUR CONTRIBUTION NOTICE					13NOV78	1	78HGE/155/1756
	30 DAY PRE-PRIMARY	6,760		7,672		1JUL78 - 28AUG78	8	78HGE/144/4157
	JULY 10 QUARTERLY	13,925		4,600		14APR78 - 30JUN78	12	78HGE/141/2954
	JULY 10 QUARTERLY - AMENDMENT					14APR78 - 30JUN78	5	78HGE/144/4119
	OCTODER 10 QUARTERLY	13,490		14,983		29AUG78 - 30SEP78	11	78HGE/150/4019
	30 DAY PRE-GENERAL		23,294		15,043	30CT78 - 23OCT78	15	78HGE/153/0235
	REQUEST FOR ADDITIONAL INFORMATION					30CT78 - 23OCT78	2	79FEC/120/3563
	30 DAY PRE-GENERAL - AMENDMENT					23OCT78	5	79HGE/163/1977
	30 DAY PRE-GENERAL - AMENDMENT					23OCT78	1	79HGE/163/1964
	30 DAY POST-PRIMARY			0		10CT78 - 20CT78	5	78HGE/150/3052
	30 DAY POST-GENERAL		25,068		30,758	24OCT78 - 27NOV78	19	78HGE/150/0506
	30 DAY POST-GENERAL - AMENDMENT		25,068		30,758	24OCT78 - 27NOV78	17	78HGE/160/2138
	REQUEST FOR ADDITIONAL INFORMATION					24OCT78 - 27NOV78	1	79FEC/120/3566
	30 DAY POST-GENERAL - AMENDMENT		25,068		30,758	24OCT78 - 27NOV78	2	79HGE/161/3318
	30 DAY POST-GENERAL - AMENDMENT					27NOV78	3	79HGE/163/1974
	YEAR END REPORT		306		3,646	28NOV78 - 31DEC78	7	79HGE/161/3311
	YEAR END REPORT - AMENDMENT					31DEC78	1	79HGE/163/1968
	TOTAL	34,175	48,668	29,263	49,447		126	TOTAL PAGES



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1979

Paul S. Rosen, Treasurer
Citizens for John Randolph
P. O. Box 134
Blue Point, New York 11715

Dear Mr. Rosen:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General Election Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

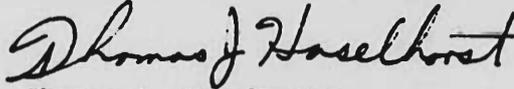
The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

83304039550

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Lorrie Castaneda (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4172.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director

Enclosure

8/30/01 3195506-4

MEMORANDUM: FOR FILES

RE: TELECON

FROM: Paul Rosen to Susan Weber

DATE: 12/5/79

NAME OF COMMITTEE: Citizens for John Randolph/ NY - 1

I spoke with Mr. Rosen since Lorrie Castaneda had since departed from the Commission. The committee had received a surface violation letter (SV179-95LC) concerning the acceptance of an excessive contribution from a county organization that they assumed to be a multicandidate committee. The original violation occurred more than a year ago and the committee is still reporting only because they have a debt of \$3500 that he said they cannot pay off since the candidate is destitute, getting a divorce, etc. etc. He wanted to know what they should do since they cannot even pay off the debt from their committee much less refund \$3000 as the surface letter details. I told him that unfortunately, the commission will expect him to take some action to collect the money, etc. I told him that he could call back (as he is a salesman and cannot be reached) tomorrow and I would talk to someone and advise him in this situation. After talking to Peggy Sims, I will instruct him to send in a letter detailing the situation and let the commission take it from there.

830403950

Telecon:

Greevy with Kevin Brosnahan
Suffolk County Democratic Committee
12/20/79
516-661-8631

Please note that I called Downey's office (516/661-8777) and was informed that KB does not work there.

I called KB to ask him what the status was regarding the excessive contributions made to Ambro, Downey, and Randolph by the committee.

He stated that the committee received refunds from Ambro and Downey. He stated further that Randolph's campaign has no money and that Randolph lost a local election in November, so he's probably further in debt.

I told KB that we would like to have a letter regarding the current status of the situation, i.e. refunds received for Ambro and Downey, and a statement regarding any requests made by the committee to Randolph for the refund.

I asked specifically if the committee had requested the refund from Randolph. KB stated that he would have to call back next week as he's been quite busy with plans for delegate selection and other matters, and he was hoping to work on this matter on Saturday.

He agreed to call Thursday next.

I told him again that we should have a letter as soon as possible regarding the current status of the matters.

8 3 0 4 0 3 9 5 5 0 9

1 ADVISORY OPINION 1980-64

2 Mr. Robert H. Chanin
3 General Counsel
4 National Education Association
5 1201 16th Street, N.W.
6 Washington, D.C. 20036

7 Dear Mr. Chanin:

8 This responds to your letter of May 22, 1980, requesting
9 an advisory opinion concerning application of the Federal Election
10 Campaign Act of 1971, as amended ("the Act") and Commission
11 regulations to the proposed payment by the National Education
12 Association ("NEA") from its general treasury funds to NEA
13 members who have been selected to serve as delegates to the 1980
14 Democratic and Republican national nominating conventions for
15 their travel and subsistence expenses incurred in attending the
16 conventions.

17 According to your letter, NEA is a labor organization, com-
18 prised essentially of professional employees of public school
19 districts. You explain that several NEA members who have been
20 elected to serve as delegates to the 1980 Democratic and Republican
21 national nominating conventions have indicated that the travel and
22 subsistence expenses involved in attending the conventions will
23 place a significant strain on their personal resources. In order
24 to relieve the strain, NEA proposes to use its general treasury
25 funds to pay the travel and subsistence expenses of its members who
are delegates. Thus, the question raised by your request is whether
NEA may use its general treasury funds to pay the delegate travel
and subsistence expenses of the NEA members who have been selected
to serve as delegates to the 1980 Democratic and Republican national
nominating conventions?

1
2 The Commission concludes that NEA may not pay for the travel
3 and subsistence expenses of its members who are delegates to the
4 Democratic and Republican national nominating conventions.
5 Section 110.14(f) of the Commission's proposed regulations*/
6 which addresses delegate selection, see 45 Fed. Reg. 34865 (1980),
7 specifically states that "all contributions to and expenditures
8 by any delegate ... are subject to the prohibitions of 11 CFR
9 110.4(a), Part 114 and 2 U.S.C. §§441b and 441e." Section 441b
10 contains a general prohibition against corporate and labor organiza-
11 tion contributions and expenditures made in connection with a
12 federal election. Section 110.14(d) of those same proposed
13 regulations states that expenditures by a delegate to defray costs
14 incurred for his/her selection are not subject to 11 CFR Part 110
15 and 2 U.S.C. §441a. It further explains that such costs include
16 the costs of travel and subsistence during the delegate selection
17 process, including the national nominating convention. Nothing in
18 the explanation and justification of the regulations concerning
19 contributions to and expenditures by delegates to national nominating
20 conventions, nor the proposed regulations themselves indicates that
21 payments by a corporation or labor organization to defray delegate
22 expenses was intended to be permissible. Thus, payment for the
23 travel and subsistence expenses of NEA members who are delegates to
24 the national nominating conventions, as well as other expenses of

25
*/The Commission transmitted these proposed regulations to Congress
on May 14, 1980. If neither House of Congress disapproves the regula-
tion within 30 legislative days after its transmittal, the Commission
may prescribe these regulations. 2 U.S.C. §438(d).

3 such delegates, are subject to the prohibitions of §441b and §441e.

4 NEA in its request suggests that payments for travel and
5 subsistence to their members who are delegates is permissible
6 under the statutory exception for "nonpartisan ... get-out-the-vote
7 campaigns by a labor organization aimed at its members"

8 2 U.S.C. §441b(b)(2)(B). The Commission disagrees with this
9 interpretation. Although 2 U.S.C. §441b(b)(2)(B) provides that
10 general treasury funds of a labor organization may be used for non-
11 partisan registration and get-out-the-vote campaigns aimed at its
12 members and their families, that is not the situation presented
13 by NEA's request.

14 "Registration" and "get-out-the-vote drive" are terms of
15 art used in campaign or election parlance. Those terms generally
16 connote efforts to increase the number of persons who register
17 to vote and once registered, to maximize the number of eligible
18 voters who go to the polls. The legislative history of the Hansen
19 amendment, see 117 Cong. Rec. 43379 (1971), presently 2 U.S.C.
20 §441b(b)(2), talks in those terms and discusses various types of
21 registration and get-out-the-vote activity. Nowhere in that
22 discussion is there any mention of encouraging or facilitating
23 attendance of delegates at a nominating convention. Polling places
24 are mentioned in terms of the public but certainly not as the
25 convention floor. Moreover, Commission regulation §114.3(c)(3)
which elaborates on permissible get-out-the-vote activity by a labor
organization directed toward its membership, does so in terms of
both registration and get-out-the-vote drives. It is obvious from

3 such joint treatment that the permissibility of get-out-the-vote
4 activity by either a labor organization or a corporation was not
5 meant to reach attendance of delegates to a national nominating
6 convention.

7 This response constitutes an advisory opinion concerning
8 application of the Act, or regulations prescribed by the Commission,
9 to the specific transaction or activity set forth in your request.
10 See 2 U.S.C. §437f.

11 Sincerely yours,

12 Max L. Friedersdorf
13 Chairman for the
14 Federal Election Commission
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ADVISORY OPINION 1980-64

*To be typed Bev - to put on
tape*

1 Mr. Robert H. Chanin
2 General Counsel
3 National Education Association
4 1201 16th Street, N.W.
5 Washington, D. C. 20036

PAK

Dear Mr. Chanin:

6 This responds to your letter of May 22, 1980, requesting an
7 advisory opinion concerning application of the Federal Election
8 Campaign Act of 1971, as amended ("the Act") and Commission
9 regulations to the proposed payment by the National Education
10 Association ("NEA") from its general treasury funds to NEA members
11 who have been selected to serve as delegates to the 1980 Democratic
12 and Republican national nominating conventions for their travel
13 and subsistence expenses incurred in attending the conventions.

14 According to your letter, NEA is a labor organization,
15 comprised essentially of professional employees of public school
16 districts. You explain that several NEA members who have been
17 elected to serve as delegates to the 1980 Democratic and Republican
18 national nominating conventions have indicated that the travel and
19 subsistence expenses involved in attending the conventions will
20 place a significant strain on their personal resources. In order
21 to relieve the strain, NEA proposes to use its general treasury
22 funds to pay the travel and subsistence expenses of its members who
23 are delegates. Thus, the question raised by your request is whether
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25 and subsistence expenses of the NEA members who have been selected
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5 Section 110.14(f) of the Commission's proposed regulations^{*/}
6 which addresses delegate selection, see 45 Fed. Reg. 34865 (1980),
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9 110.4(a), Part 114 and 2 U.S.C. §§441b and 441e." Section 441b
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11 tion contributions and expenditures made in connection with a
12 federal election. Section 110.14(d) of those same proposed
13 regulations states that expenditures by a delegate to defray costs
14 incurred for his/her selection are not subject to 11 CFR Part 110
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16 the costs of travel and subsistence during the delegate selection
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22 expenses was intended to be permissible. Thus, payment for the
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24 the national nominating conventions, as well as other expenses of

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^{*/} The Commission transmitted these proposed regulations to Congress
on May 14, 1980. If neither House of Congress disapproves the regula-
tion within 30 legislative days after its transmittal, the Commission
may prescribe these regulations. 2 U.S.C. §438(d).

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2 such delegates, are subject to the prohibitions of §441b and §441e.

3 NEA in its request suggests that payments for travel and
4 subsistence to their members who are delegates is permissible
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6 campaigns by a labor organization aimed at its members"

7 2 U.S.C. §441b(b)(2)(B). The Commission disagrees with this
8 interpretation. Although 2 U.S.C. §441b(b)(2)(B) provides that
9 general treasury funds of a labor organization may be used for non-
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14 art used in campaign or election parlance. Those terms generally
15 connote efforts to increase the number of persons who register
16 to vote and once registered, to maximize the number of eligible
17 voters who go to the polls. The legislative history of the Hansen
18 amendment, see 117 Cong. Rec. 43379 (1971), presently 2 U.S.C.
19 §441b(b)(2), talks in those terms and discusses various types of
20 registration and get-out-the-vote activity. Nowhere in that
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24 convention floor. Moreover, Commission regulation §114.3(c)(3)
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organization directed toward its membership, does so in terms of
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such joint treatment that the permissibility of get-out-the-vote activity by either a labor organization or a corporation was not meant to reach attendance of delegates to a national nominating convention.

This response constitutes an advisory opinion concerning application of the Act, or regulations prescribed by the Commission, to the specific transaction or activity set forth in your request. See 2 U.S.C. §437f.

Sincerely yours,

Max L. Friedersdorf
Chairman for the
Federal Election Commission

REPORTS ANALYSIS REFERRAL SHEET

DATE March 24, 1980 ANALYST Dug Greevy
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel
 THROUGH: STAFF DIRECTOR OPW COMPLIANCE REVIEW PS/WH
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS THH

CANDIDATE/COMMITTEE: Suffolk County Democratic Committee Federal
 TREASURER: Election Account 1978
 ADDRESS: Arthur Minardi, Treasurer
 Half Moon Pond Road
 AFFILIATE(S): Ridge, NY

ALLEGATION(S): Excessive Contribution Made to Candidates for Federal Office
 CITE: 2 U.S.C. 441a
 ATTACHMENT(S): 3

DATE INITIATED: 10/16/79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project:
 ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 3/2/78 TO 11/28/78
 TOTAL RECEIPTS \$ 14,200 TOTAL EXPENDITURES \$ 14,200
 CASH ON HAND \$ 0 DEBTS \$ 0

HISTORY:
 RESULTS OF REVIEW: ATTACHMENT
 Request for Additional Information, 9/21/79, Termination Report 2
 3SV1/79-148, 10/16/79, Termination Report 3
 Second Notice for FAI of 9/21/79 4

Note: Attachments 2 and 4 are not relevant to allegations above
 COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
 Telecon: Greevy with Brosnahan, 11/5/79 5
 Telecon: Greevy with Brosnahan, 12/20/79 6

Note: It is not clear in what capacity Brosnahan is representing the committee
Response of 1/29/80 indicates that Brosnahan is Special Counsel.

REASON(S) FOR REFERRAL: ATTACHMENT
 Response to 3SV1/79-148, received 1/29/80 7
 Amounts of excessive contributions meet RAD threshold for OGC review.
 Note: No refund has been made by Committee to Elect John Randolph, as of 1/29/80

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
 None

OTHER RELEVANT INFORMATION: ATTACHMENT
 Committee's Form 1 and Form 3 (Termination) were received 4/9/79.
 Committee stated in Form 1 that Minardi was the only officer of the committee.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
 None

REPORTS ANALYSIS REFERRAL SHEET

DATE _____ ANALYST Ed Ryan EDR
 TO: Office of General Counsel TEAM CHIEF Peter Kell, Jr. PKJ
 THROUGH: STAFF DIRECTOR [Signature] COMPLIANCE REVIEW Bowen/Sims
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Committee to Re-Elect Congressman Ambro NY/03 C00050864
 TREASURER: Andrew L. Cisternino
 ADDRESS: P.O. Box 832
 Huntington, New York 11743

AFFILIATE(S): N/A

ALLEGATION(S): Excessive contribution from Non-Qualified Committee CITE: 2 U.S.C. 441(a) ATTACHMENT(S) #2

DATE INITIATED: 10-10-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-1-78 TO 10-23-78
 TOTAL RECEIPTS \$ 16,975.57 TOTAL EXPENDITURES \$ 20,303.71
 CASH ON HAND \$ 4223.49 DEBTS \$ -0-

HISTORY:

RESULTS OF REVIEW: Surface Violation letter for the 10 Day Pre-General Election Report sent 10-16-79. ATTACHMENT #3
 Adequate response received 11-9-79. #4
 Refund disclosed on Year End 1979 Schedule B, filed on 1-15-80 #5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
 N/A

REASON(S) FOR REFERRAL: ATTACHMENT
 Meets division threshold for referral.

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
 N/A

OTHER RELEVANT INFORMATION: ATTACHMENT
 Refer to the Downey referral
 " " " Randolph "
 " " " Suffolk County Democratic Committee referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
 N/A

REPORTS ANALYSIS REFERRAL SHEET

DATE _____ ANALYST Ed Ryan EDR
 TO: Office of General Counsel TEAM CHIEF Peter Kell, Jr.
 THROUGH: STAFF DIRECTOR WJD COMPLIANCE REVIEW Bowen/Sims CBS
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS WJD

CANDIDATE/COMMITTEE: Citizens for Downey 78 NY/02 C00086215
 TREASURER: Leonard De Prospo
 ADDRESS: P.O. Box 91P
 Bay Shore, New York 11706

AFFILIATE(S):
 N/A
 ALLEGATION(S): Excessive CITE: 2 U.S.C. 441a(A) ATTACHMENT(S)
 contribution from non-qualified #2
 committee.

DATE INITIATED: 10-10-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other: ATTACHMENT
 Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-24-78 TO 11-27-78
 TOTAL RECEIPTS \$ 20,446.83 TOTAL EXPENDITURES \$ 18,316.01
 CASH ON HAND \$ 5,958.27 DEBTS \$ 17,774.02

HISTORY:

RESULTS OF REVIEW: Surface violation letter for the 30 ATTACHMENT
 Day Post General Election report sent 10-16-79, #3
 Adequate response received 11-8-79. #4
 Refund disclosed 11-6-79 on the Year End 1979 report, filed #5
 1-15-80 (Schedule B).

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT
 N/A

REASON(S) FOR REFERRAL: ATTACHMENT
 Meets division threshold for referral

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
 N/A

OTHER RELEVANT INFORMATION: ATTACHMENT
 Refer to Ambro's referral
 " " Suffolk County Democratic Committee referral
 " " Randolph's referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE March 27, 1980 ANALYST Ed Ryan EDR
 TO: Office of General Counsel TEAM CHIEF Peter Kell, Jr. PKJ
 THROUGH: STAFF DIRECTOR COMPLIANCE REVIEW Bowen/Sims
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS TAH

CANDIDATE/COMMITTEE: Citizens for John Randolph Committee NY/02 C00095299
 TREASURER: Paul S. Rosen
 ADDRESS: La Bonne Vie Apts. Bldg. 34C
 East Patchogue, New York 11772

AFFILIATE(S): N/A

ALLEGATION(S): Excessive contribution from a Non-qualified committee CITE: 2 U.S.C. 441a(a) ATTACHMENT(S) #2

DATE INITIATED:

10-10-79

MANNER IN WHICH REVIEW WAS INITIATED:

Normal Review Other:
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-3-78 TO 10-23-78

TOTAL RECEIPTS \$ 23,294.52 TOTAL EXPENDITURES \$ 15,043.62
 CASH ON HAND \$ 13,161.62 DEBTS \$ " " by Cmte. 3,000.00
 " " by Cmte. 3,500.00

HISTORY:

RESULTS OF REVIEW: ATTACHMENT #3
 Surface violation letter for the 10 Day Pre-Election Report sent 10-16-79.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: ATTACHMENT #4
 Telecon 12-05-79 #5
 Telecon 12-20-79

REASON(S) FOR REFERRAL: ATTACHMENT
 No response to Surface Violation Notice; Excessive contribution has not been refunded; and meets RAD threshold for referral

OTHER PENDING ACTIONS INITIATED BY RAD: ATTACHMENT
 N/A

OTHER RELEVANT INFORMATION: ATTACHMENT
 Refer to Ambro's referral
 " " Downey's " "
 " " Suffolk County Democratic Committee referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

MEMORANDUM

March 24, 1980

TO: Charles Steele

THROUGH: Orlando B. Potter *OBP*

FROM: TOM HASELHORST *TH*

SUBJECT: SUFFOLK COUNTY DEMOCRATIC COMMITTEE FEDERAL ELECTION ACCOUNT 1978
 CITIZENS FOR DOWNEY '78 NY/2
 COMMITTEE TO RE-ELECT CONGRESSMAN AMBRO NY/3
 CITIZENS FOR JOHN RANDOLPH NY/2

Please note that the attached referrals for the above mentioned committees are concerned with the same transaction and should be reviewed and handled simultaneously.

83040395518

REPORTS ANALYSIS REFERRAL SHEET

DATE March 24, 1980 ANALYST Dug Greevy
 TO: Office of General Counsel TEAM CHIEF Bobby Werfel
 THROUGH: STAFF DIRECTOR AM COMPLIANCE REVIEW PS/CS
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS AJH

CANDIDATE/COMMITTEE: Suffolk County Democratic Committee Federal
 TREASURER: Election Account 1978
 ADDRESS: Arthur Minardi, Treasurer
 Half Moon Pond Road
 AFFILIATE(S): Ridge, NY

ALLEGATION(S): Excessive Contribution Made to Candidates for Federal Office
 CITE: 2 U.S.C. 441a
 ATTACHMENT(S): 3

DATE INITIATED: 10/16/79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other:
 Special Project:
 ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 3/2/78 TO 11/28/78

TOTAL RECEIPTS \$ 14,200 TOTAL EXPENDITURES \$ 14,200

CASH ON HAND \$ 0 DEBTS \$ 0

HISTORY:

RESULTS OF REVIEW: **ATTACHMENT**
 Request for Additional Information, 9/21/79, Termination Report 2
 3SV1/79-148, 10/16/79, Termination Report 3
 Second Notice for PFAI of 9/21/79 4

Note: Attachments 2 and 4 are not relevant to allegations above

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: **ATTACHMENT**
 Telecon: Greevy with Brosnahan, 11/5/79 5
 Telecon: Greevy with Brosnahan, 12/20/79 6

Note: It is not clear in what capacity Brosnahan is representing the committee. Response of 1/29/80 indicates that Brosnahan is Special Counsel.

REASON(S) FOR REFERRAL: **ATTACHMENT**
 Response to 3SV1/79-148, received 1/29/80 7
 Amounts of excessive contributions meet RAD threshold for OGC review.
 Note: No refund has been made by Committee to Elect John Randolph, as of 1/29/80

OTHER PENDING ACTIONS INITIATED BY RAD: **ATTACHMENT**
 None

OTHER RELEVANT INFORMATION: **ATTACHMENT**
 Committee's Form 1 and Form 3 (Termination) were received 4/9/79.
 Committee stated in Form 1 that Minardi was the only officer of the committee.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
 None



FEDERAL ELECTION COMMISSION

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

SEP 21 1978

Arthur Minardi, Treasurer
Suffolk County Democratic Committee-
Federal Election Account 1978
Half Moon Pond Road
Ridge, NY

Dear Mr. Minardi:

This letter is prompted by our interest in assisting committees who wish to comply with the Federal Election Campaign Act.

During review of the Termination Report of Receipts and Expenditures, we noted that you omitted certain information or made apparent mathematical errors in certain entries. Attached is an itemization of the information requested.

While we recognize the difficulties you may have experienced in filling out the reporting forms, we must ask that you supply the Commission with the missing information within fifteen (15) days from the date of this letter. If you have any questions, please do not hesitate to contact David Greevy in our Reports Analysis Division on the toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Orlando B. Potter

Orlando B. Potter
Staff Director

Attachment
FEC Form 12

79031364369
83040339521

2

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

SEP 21 1979

TO: Suffolk County Democratic Committee-
Federal Election Account-1978

DATE: _____
I.D. NO.: C00108944

REQUEST FOR ADDITIONAL INFORMATION FOR THE Termination REPORT OF RECEIPTS
AND EXPENDITURES COVERING THE PERIOD 3/2/78 THROUGH 11/28/78,
PURSUANT TO THE FEDERAL ELECTION CAMPAIGN ACT OF 1971, AS AMENDED.

A review of the report indicates that additional information is needed in order to be considered complete. Please return a copy of this form with your amended submission(s).

Please provide the required data, as indicated (x):

- Coverage Dates: omitted or incorrect
- Summary Page Line(s): Column(s): Totals: omitted or incorrect
- 0 Detailed Summary (Page 2) Line(s): Column(s): Totals: omitted or incorrect
- 7 Schedule Totals: disagree with Detailed Summary (Page 2) or omitted
- 3 Date(s): omitted or inadequate for Schedule(s) Line(s) _____
- 4 Full Name(s)/Mailing Address(es): omitted or inadequate for Schedule(s) Line(s) _____
- 6 Occupation/Principal Place(s) of Business: omitted or inadequate for Schedule(s) Line(s) _____
- 3 Election Designation: omitted or inadequate for Schedule(s) Line(s) _____
- 1 Aggregate Year-to-Date Totals: omitted or inadequate for Schedule(s) Line(s) _____
- 3 Nature or Purpose of Expenditure: omitted or inadequate for Schedule(s) Line(s) _____
- 0 Nature or Purpose of Receipt: omitted or inadequate for Schedule(s) Line(s) _____
- 7 Inadequate Description of: proceeds dates events location of Schedule
- 3 Signature: omitted inadequate

11 CFR 104.12(a) requires each person having the responsibility to file a report to sign the original report. Please resubmit a signed copy of your report.

Other: The committee has reported receipts from a fundraising event. However, no
expenditures for the event have been disclosed. Please provide the circumstances for this
discrepancy, and state who paid for the event and in what amount(s)

Your initial submission(s), together with this request for additional information, has been made available for public inspection. The Commission urges you to file the additional submission(s) promptly to the above address. If you have any questions regarding this request, please call the Reports Analysis Division toll free at (800) 424-9530. The local Washington, D.C. telephone numbers are (202) 523-4048 (Senate, Non-Party), 523-4172 (House) or 523-1474 (Party).

Senate filers should file their submission(s) with the Secretary of the Senate, Office of Public Records, 119 D St., N.E., Washington, D.C. 20510. House filers should file their submission(s) with the Clerk of the House, Office of Records and Registration, 1036 Longworth House Office Building, Washington, D.C. 20515.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1979

Arthur Minardi, Treasurer
Suffolk County Democratic Committee-
Federal Election Account 1978
Half Moon Pond Road
Ridge, New York

Dear Mr. Minardi:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the Termination Report of Receipts and Expenditures, we noticed entries indicating that you have made contributions which exceed the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

The Act precludes individuals and political committees, other than multicandidate political committees, from making political contributions to a candidate for Federal office in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered with the Commission for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office.

The Commission recommends that if you have made contributions in excess of the limits set forth in the Act that you notify the recipients and request refunds of the amounts in excess of \$1,000. By separate letters to the recipients we have recommended that such refunds be made upon confirmation from you that the contributions were in excess of the limits. These returns should be reported immediately by letter and should be reflected as refunds on your next report of receipts and expenditures. If you find that the entries in question are incomplete or incorrect, please submit a statement which would clarify these particular matters for the public record. You may do so by amending your original report of receipts and expenditures.

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact David Greevy (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director

Enclosure

33040395520

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Commission
A.W.
S.C. 20463

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Suffolk County Democratic Committee Federal Election Account 1974

Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
<i>RANDOLPH Committee to Elect John Randolph of John Randolph Brotherhood Hall, Raleigh, N.C.</i>	<i>Donation 00095299</i> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<i>11/20/76</i>	<i>\$4,000</i>
<i>AMPRO Committee to Re-Elect Congressman Ampro of James Ampro / House of Representatives Washington, D.C.</i>	<i>Donation 00050864</i> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<i>11/21/76</i>	<i>\$3,000</i>
<i>Downey Committee to Re-Elect Congressman Downey of House Downey / House of Representatives Washington, D.C.</i>	<i>Donation 00051136</i> Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<i>10/31/76</i>	<i>\$3,000</i>
<i>Suffolk County Democratic Com. of James Strained Highway Hempstead, N.Y.</i>	<i>Donation</i> Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input checked="" type="checkbox"/> Other	<i>11/26/76</i>	<i>\$4,200</i>
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures this page (optional)			<i>\$ 14,200</i>
TOTAL this period (last page this line number only)			<i>\$ 14,200</i>

Telecon:

Greevy with Kevin Brosnahan
Suffolk County Democratic Committee Federal Election Account 1478
11/5/79
3SV1/79-148 & RFAI
516/661-8631 or 516/661-8777 (Congressman Downey's Office)

KB called today. He originally asked to talk to Lorrie Castaneda about the letter received by Downey on the same matter. She realized after talking with him for a moment that he was calling on behalf of the committee above. I took the call at that point.

He asked how the committee could qualify as a multicandidate committee, thereby taking care of the problem. I stated that the committee could not qualify at this time and have that apply to the contributions made in '78.

He asked what should be done. I stated that he should receive the required refunds from the candidates, i.e. \$3,000 from Randolph, and \$2,000 from Ambro and from Downey.

He wanted to know if there was any way that the committee could then give the money back to the candidates, as he didn't think it was right for the committee to ask for the refunds after such a long period of time.

I stated that the committee may be able to make \$1,000 contributions to the candidates next year for each election, i.e. primary and general. As such, the contributions would have to be clearly designated for the specific elections, and were the candidate(s) not to run in the general election, a refund would then probably be required for the \$1,000 attributed to the general election.

He said he understood this and that the committee would probably do this. As they have terminated, he will establish a new Federal committee to report the receipt of the refunds, and to make the contributions. I told him that that committee would have to qualify independently of the committee registered last year. (Note: We earlier discussed the possibility that the committee last year may have been affiliated with a multicandidate committee, but he determined that it was not)

He asked about the RFAI sent. I told him that I would review the file and get back in touch. I called him about 30 minutes later.

I stated that the point of the RFAI was to determine if any other account(s) or committee(s) had paid for the fundraiser, thereby providing an in-kind contribution to the registered account. He stated that another account did pay the expenses, but that the \$4,200 transfer made on 11/28/78 to the State account was for the purposes of reimbursing for the fundraiser and of providing the State account with other funds. He will indicate this in a letter.

We returned the conversation to the 441a problems. He stated that there was no problem with Downey and Ambro as far as making the refunds. He stated that Randolph would be a problem however because his committee had terminated and he would not be running for Congress again.

continued

8304039552

Telecon-continued

Suffolk County Democratic Committee
11/5/79

He stated that he knew that Randolph didn't have any money left over from the campaign and he asked what should be done. I stated that for purposes of compliance, we are expecting a refund to his committee from Randolph's committee in the amount of \$3,000.

He stated that that could not be done. I stated that we deal with committees at this stage to attempt to gain compliance. If compliance is not gained, the matter could be referred to OGC to attempt to gain compliance.

He stated that Randolph is in a local election tomorrow, and that his state election committee may have the funds. He stated that that probably would not be a good thing to do though, i.e. make the refund from that campaign. I suggested only that Randolph call Lorrie about the problem.

He said finally that we would hear from the committee shortly.

83040395526



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

4

3-2-78

December 20, 1979

11-28-78

Arthur Minardi, Treasurer
Suffolk County Democratic Committee - Federal
Election Account 1978
Half Moon Pond Road
Ridge, NY

REFERENCE: Termination Report

Dear Mr. Minardi:

This letter is to inform you that as of this date, the Commission has not received your response to our request for additional information, dated September 21, 1979. That notice requested information essential to full public disclosure of your Federal election financial activity and to assure compliance with provisions of the Federal Election Campaign Act (the Act).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to take legal action to insure compliance with the Act.

If you should have any questions related to this matter, please contact David Greevy on our toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

830403130144

Telecon:

Greevy with Kevin Brosnahan
Suffolk County Democratic Committee
12/20/79
516-661-8631

Please note that I called Downey's office (516/661-8777) and was informed that KB does not work there.

I called KB to ask him what the status was regarding the excessive contributions made to Ambro, Downey, and Randolph by the committee.

He stated that the committee received refunds from Ambro and Downey. He stated further that Randolph's campaign has no money and that Randolph lost a local election in November, so he's probably further in debt.

I told KB that we would like to have a letter regarding the current status of the situation, i.e. refunds received for Ambro and Downey, and a statement regarding any requests made by the committee to Randolph for the refund.

I asked specifically if the committee had requested the refund from Randolph. KB stated that he would have to call back next week as he's been quite busy with plans for delegate selection and other matters, and he was hoping to work on this matter on Saturday.

He agreed to call Thursday next.

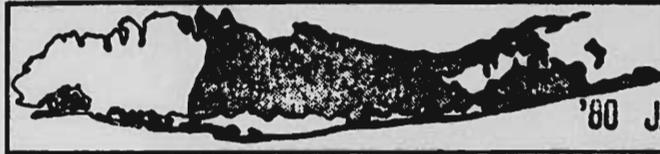
I told him again that we should have a letter as soon as possible regarding the current status of the matters.

83040395528

Suffolk County Democratic Committee

1021 Veterans Memorial Highway, Hauppauge, N.Y. 11787

Dominic J. Baranello
Chairman



FEDERAL ELECTION
Tel. (516) 979-9400

January 11, 1980

Mr. David Greevy
Federal Election Commission
Washington, D. C. 20463

Refer: 3SV1/79-148

Dear Mr. Greevy:

In response to your letter of September 21, 1979, please be advised that the Suffolk County Democratic Committee special account #2 was financed by a dinner dance held in the Spring of 1978 and that the monies shown on the report previously filed, were refunded to the Suffolk County Democratic Committees' general account, constituting the pro-rated cost for expenses incurred for the dinner and publicity attended thereto.

Please be advised that Congressman Thomas Downey's Campaign Committee has forwarded a check for \$2,000.00 to the Suffolk County Democratic Committee, pursuant to your directive. (Copy of check is enclosed) Congressman Jerome Ambro has also returned \$2,000.00, per your instructions.

I would appreciate your keeping me advised as to the status regarding Mr. John Randolph.

If I can be of any further assistance, please do not hesitate to call upon me.

Very truly yours,

Patrick Kevin Brosnahan, Jr.

PATRICK KEVIN BROSNAHAN, JR.
Special Counsel

PKB/kd

cc: Dominic Baranello
Arthur Minardi
Congressman Downey
Congressman Ambro

83040395529

CONGRESSMAN
P. O. BOX 532
WESTINGHOUSE
WESTINGHOUSE, N. Y. 11743

Nov. 9 1919

FOLK COUNTY DEMOCRATIC COMMITTEE
THOUSAND 9
NO 10 00 DOLLARS

Island Trust Company
MELVILLE, N. Y.

Andrew L. Listernens
Treasurer

⑆021410637⑆ ⑆11⑆38086⑆2⑆

000403343

CITIZENS FOR DOWNEY "78" 620

11/6 1919 50-903/214

PAY TO THE ORDER OF Suffolk Democratic Party \$200.00
Two hundred 00/100 DOLLARS

 MANUFACTURERS HANOVER TRUST COMPANY
125 WEST MAIN STREET
BAY SHORE, N. Y. 11708

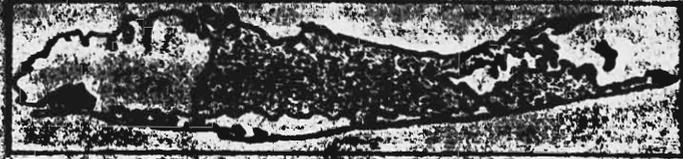
MEMO Leonard D. Prop.

⑆021409033⑆ ⑆01⑆162730⑆01

Suffolk County Democratic Committee

1021 Veterans Memorial Highway, Hauppauge, N.Y. 11787

Baranello
Minardi



Tel. (516) 979-9400

January 8, 1980

Mr. John Randolph
14 Foxcroft Lane
East Patchogue, N.Y. 11772

Dear John:

As per the committee's previous conversations with you, please be advised that the Suffolk County Democratic Committee has been informed by the Federal Election Commission that the special account #2 contribution was in excess of the contribution limitation. Accordingly, you are again advised that we hereby request re-payment in the sum of \$3,000.00.

This contribution made by the Suffolk County Democratic Committee to you was for the 1978 campaign for Congress in the 1st Congressional District.

We would appreciate your advising us as to your arrangements for re-payment.

Very truly yours,

A handwritten signature in cursive script that reads "Patrick Kevin Brosnahan, Jr." The signature is written in dark ink and is positioned above the typed name.

PATRICK KEVIN BROSNAHAN, JR.
Special Counsel

PKB:bgo

cc: Federal Election Commission
Dominic J. Baranello
Arthur Minardi

REPORTS ANALYSIS REFERRAL SHEET

DATE _____

ANALYST Ed Ryan *EDR*

TO: Office of General Counsel

TEAM CHIEF Peter Kell, Jr. *PKJ*

THROUGH: STAFF DIRECTOR *SK*

COMPLIANCE REVIEW Bowen/Sims *BS*

FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *YH*

CANDIDATE/COMMITTEE: Committee to Re-Elect Congressman Ambro NY/03 C00050864
TREASURER: Andrew L. Cisternino
ADDRESS: P.O. Box 832
Huntington, New York 11743

AFFILIATE(S): N/A

ALLEGATION(S): Excessive contribution from Non-Qualified Committee

CITE: 2 U.S.C. 441(a)

ATTACHMENT(S) #2

DATE INITIATED: 10-10-79

MANNER IN WHICH REVIEW WAS INITIATED:

- Normal Review
- Other:
- Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-1-78 TO 10-23-78

TOTAL RECEIPTS \$ 16,975.57 TOTAL EXPENDITURES \$ 20,303.71

CASH ON HAND \$ 4223.49 DEBTS \$ -0-

HISTORY:

RESULTS OF REVIEW: Surface Violation letter for the 10 Day Pre-General Election Report sent 10-16-79. *ATTACHMENT #3*
 Adequate response received 11-9-79. *#4*
 Refund disclosed on Year End 1979 Schedule B, filed on 1-15-80 *#5*

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: *ATTACHMENT*
N/A

REASON(S) FOR REFERRAL: *ATTACHMENT*
Meets division threshold for referral.

OTHER PENDING ACTIONS INITIATED BY RAD: *ATTACHMENT*
N/A

OTHER RELEVANT INFORMATION: *ATTACHMENT*
Refer to the Downey referral
" " " Randolph "
" " " Suffolk County Democratic Committee referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:
N/A

SCHEDULE A
 2010-2011
 January, 1978
 Federal Election Commission
 1375 K Street, N.W.
 Washington, D.C. 20045

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Page 3 of 3
 Line Number 13(b)

Use Separate Schedules for each numbered line!

Name of Candidate or Committee in Full COMMITTEE TO REELECT CONGRESSMAN AMBRO			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Carpenters' Legislative Improvement Committee; 101 Constitution Ave. N.W. Washington, D. C. 20001	Same Occupation Leg/Imp. Committee	10/16/78	\$ 1000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1500.00			
Dist. 3 IUE AFL-CIO COPE 375 Murray Hill Parkway East Rutherford, N.J. 07073	Same Occupation COPE	10/20/78	1000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1000.00			
Active Ballot Club 1775 K Street, N. W. Washington, D. C. 20006	Same Occupation Active Ballot Club	10/20/78	500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
TWU Local 100 PCC 1980 Broadway New York, N.Y. 10023	Same Occupation PCC	10/20/78	500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
Amalgamated Meat Cutters & Butcher Workmen of North America COPE 2800 N. Sheridan Rd., Chicago, Ill 60657	Same Occupation COPE	10/20/78	300.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
Suffolk County Democratic Committee Veterans Memorial Highway Hauppauge, N.Y.	Same Occupation SCDem.Comm.	10/23/78	3000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 3000.00			
N. Y. Telephone Federal PAC 1095 Avenue of the Americas New York, N.Y. 10036	Same Occupation PAC	10/23/78	100.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other <input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.00			
SUBTOTAL of receipts this page (optional)			\$ 6400.00
			\$

30403955

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
	CITIZENS FOR CONGRESSMAN AMBRO							ID# C00050864
✓	1977 STATEMENT OF ORGANIZATION- AMENDMENT					14 JAN 77	1	76HSE/118/5208
✓	STATEMENT OF ORGANIZATION- AMENDMENT					13 SEP 77	3	77HSE/125/1052
✓	1978 48 HOUR CONTRIBUTION NOTICE					25 OCT 78	1	78HSE/151/2781
✓	48 HOUR CONTRIBUTION NOTICE					26 OCT 78	2	78HSE/154/0416
✓	48 HOUR CONTRIBUTION NOTICE					27 OCT 78	1	78HSE/151/4023
✓	48 HOUR CONTRIBUTION NOTICE					30 OCT 78	1	78HSE/154/0444
✓	48 HOUR CONTRIBUTION NOTICE					3 NOV 78	1	78HSE/155/0706
✓	48 HOUR CONTRIBUTION NOTICE					3 NOV 78	1	78HSE/154/4743
✓	48 HOUR CONTRIBUTION NOTICE					4 NOV 78	1	78HSE/155/0245
✓	48 HOUR CONTRIBUTION NOTICE					6 NOV 78	1	78HSE/155/0721
✓	APRIL 10 QUARTERLY		100		2,576	1 JAN 78 -31 MAR 78	3	78HSE/132/1157
✓	JULY 10 QUARTERLY		14,942		9,875	1 APR 78 -30 JUN 78	13	78HSE/140/1659
✓	REQUEST FOR ADDITIONAL INFORMATION					1 APR 78 -30 JUN 78	2	78FEC/084/0129
✓	JULY 10 QUARTERLY - AMENDMENT					1 APR 78 -30 JUN 78	7	78HSE/145/3325
✓	JULY 10 QUARTERLY - AMENDMENT					1 APR 78 -30 JUN 78	8	78HSE/146/1707
✓	OCTOBER 10 QUARTERLY		20,756		26,491	1 JUL 78 -30 SEP 78	14	78HSE/147/0051
✓	30 DAY PRE-GENERAL		16,975		20,303	1 OCT 78 -23 OCT 78	13	78HSE/154/0403
✓	30 DAY POST-GENERAL		13,661		17,049	24 OCT 78 -27 NOV 78	15	78HSE/155/4530
✓	YEAR END REPORT		459		410	28 NOV 78 -31 DEC 78	5	79HSE/160/1042
✓	YEAR END REPORT - AMENDMENT					28 APR 78 -31 DEC 78	2	79HSE/170/1228
1977	APRIL 10 QUARTERLY		1,411		365	1 JAN 77 -31 MAR 77	4	77HSE/121/4857
	JULY 10 QUARTERLY		7,725		1,012	1 APR 77 -30 JUN 77	11	77HSE/123/4663
	OCTOBER 10 QUARTERLY		2,800		1,010	1 JUL 77 -30 SEP 77	7	77HSE/126/3691
	YEAR END REPORT	420		1,165		1 OCT 77 -31 DEC 77	4	78HSE/128/2550
	TOTAL	420	78,829	1,165	79,091		121	TOTAL PAGES



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1979

Andrew L. Cisterino, Treasurer
Committee to Re-Elect Congressman Ambro
P. O. Box 832
Huntington, NY 11743

Dear Mr. Cisterino:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

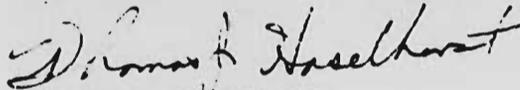
The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

3'30'11 40313190525369

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Lorrie Castaneda (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4172.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director

Enclosure

8/30/31/02/570
3040395536

RE-ELECT IN '80

Congressman
Jerome A. Ambro

NOV 9 1979
CERTIFIED MAIL
CERTIFIED MAIL
November 9, 1979

73 NOV 13 AM 1:19

Federal Election Commission
Washington, D. C. 20462

Re: Citizens for Congressman Ambro
H. I. 010754
Your reference # 45V1/79-90
Attn: Mr. Thomas J. Jaselhorst
Assistant Staff Director

U.S. HOUSE OF REPRESENTATIVES
919 NOV 14 PM 12:21

7 3 3 0 4 0 3 9 5 9 3 7

Dear Mr. Jaselhorst:

In response to your letter of October 16, 1979, this will advise you that we have on this date returned the sum of \$2000.00 to the Suffolk County Democratic Committee. A copy of our check is enclosed.

We were not aware that the Suffolk Democratic Committee was not a multi-candidate committee, and in accordance with your suggestion, this refund will be reflected in our year end report of receipts and expenditures.

Thank you for bringing this to our attention.

Sincerely,
A. L. Cisternino

A. L. Cisternino
Treasurer

c/c: Suffolk County Democratic Committee
1021 Veterans Memorial Highway
Lynn, Mass. 01901

SCHEDULE B
REVISED
 January, 1976
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20543

ITEMIZED EXPENDITURES
 (Operating, Training Out, Contributions In-Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 2 of 2 for
 Line Number 219
 File Separate Schedules for
 each numbered line!

Name of Candidate or Committee in Full CITIZENS FOR CONGRESSIONAL AMBRO			
Full Name, Mailing Address and ZIP Code Suffolk County Democratic Committee Veterans Memorial Highway Buxyange, N.Y.	Particulars of Expenditure Refund	Date (month, day, year) 11/9/79	Amount of each expen- sure this period \$2000.00
	Expenditure for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		Agg. \$2000.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expen- sure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expen- sure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expen- sure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expen- sure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expen- sure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expen- sure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expen- sure this period
	Expenditure for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other		

2304039530
 8001171166R

\$2000.00

REPORTS ANALYSIS REFERRAL SHEET

DATE _____ ANALYST Ed Ryan *EDR*
TO: Office of General Counsel TEAM CHIEF Peter Kell, Jr. *PKJ*
THROUGH: STAFF DIRECTOR *ADP* COMPLIANCE REVIEW Bowen/Sims *OB*
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS *ADH*

CANDIDATE/COMMITTEE: Citizens for Downey 78 NY/02 C00086215
TREASURER: Leonard De Prospo
ADDRESS: P.O. Box 91P
Bay Shore, New York 11706

AFFILIATE(S):
N/A
ALLEGATION(S): Excessive contribution from non-qualified committee. CITE: 2 U.S.C. 441a(A) ATTACHMENT(S)
#2

DATE INITIATED: 10-10-79

MANNER IN WHICH REVIEW WAS INITIATED:
 Normal Review Other: ATTACHMENT
 Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-24-78 TO 11-27-78
TOTAL RECEIPTS \$ 20,446.83 TOTAL EXPENDITURES \$ 18,316.01
CASH ON HAND \$ 5,958.27 DEBTS \$ 17,774.02

HISTORY:

RESULTS OF REVIEW: Surface violation letter for the 30 Day Post General Election report sent 10-16-79, Adequate response received 11-8-79. Refund disclosed 11-6-79 on the Year End 1979 report, filed 1-15-80 (Schedule B). ATTACHMENT #3 #4 #5

COMMUNICATIONS WITH CANDIDATE/COMMITTEE: N/A ATTACHMENT

REASON(S) FOR REFERRAL: Meets division threshold for referral ATTACHMENT

OTHER PENDING ACTIONS INITIATED BY RAD: N/A ATTACHMENT

OTHER RELEVANT INFORMATION: Refer to Ambro's referral ATTACHMENT
" " Suffolk County Democratic Committee referral
" " Randolph's referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (77-78)

DATE 13/FEB/80

PAGE 1

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
CITIZENS FOR DOWNEY								ID #C00086215
	1978 STATEMENT OF ORGANIZATION					27/JAN/78	3	78HSE/128/4979
	APRIL 10 QUARTERLY	5,557		5,285		1/JAN/78-31/MAR/78	8	78HSE/132/4775
	APRIL 10 QUARTERLY - AMENDMENT						1	78HSE/137/1296
	60 DAY PRE-PRIMARY	12,595		13,398		1/JUL/78-28/AUG/78	15	78HSE/144/1670
	60 DAY PRE-PRIMARY - AMENDMENT					1/JUL/78-28/AUG/78	1	78HSE/148/2218
	JULY 10 QUARTERLY	32,369		28,214		1/APR/78-30/JUN/78	24	78HSE/140/1068
	JULY 10 QUARTERLY - AMENDMENT					1/APR/78-30/JUN/78	1	78HSE/142/3395
	REQUEST FOR ADDITIONAL INFORMATION					1/APR/78-30/JUN/78	3	78FEC/084/3534
	JULY 10 QUARTERLY - AMENDMENT					1/APR/78-30/JUN/78	2	78HSE/146/594
	OCTOBER 10 QUARTERLY		16,554		16,750	29/AUG/78-30/SEP/78	18	78HSE/150/533
	REQUEST FOR ADDITIONAL INFORMATION					29/AUG/78-30/SEP/78	3	78FEC/096/2883
	REQUEST FOR ADDITIONAL INFO 2ND					30/SEP/78	1	79FEC/123/1121
	OCTOBER 10 QUARTERLY - AMENDMENT		16,554		16,750	29/AUG/78-30/SEP/78	3	79HSE/162/4513
	60 DAY PRE-GENERAL		13,862		13,462	1/OCT/78-23/OCT/78	20	78HSE/151/3942
	60 DAY POST-GENERAL		20,446		18,316	24/OCT/78-27/NOV/78	19	78HSE/158/3715
	REQUEST FOR ADDITIONAL INFORMATION					24/OCT/78-27/NOV/78	3	79FEC/122/0934
	REQUEST FOR ADDITIONAL INFORMATION					24/OCT/78-27/NOV/78	2	79FEC/140/2557
	60 DAY POST-GENERAL - AMENDMENT					24/OCT/78-27/NOV/78	2	79HSE/170/1223
	YEAR END REPORT		738		0	28/NOV/78-31/DEC/78	8	79HSE/161/1881
	TOTAL	50,521	51,600	46,897	48,528		137	TOTAL PAGES

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full
 Citizens for Downey '78

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
NY Telephone (Federal Political Action Comm.) 1095 Avenue of Americas NY, NY	18K C00101717 Occupation non-affiliated	11/4/78	100.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00		
Podiatry PAC 20 Chevy Chase Circle Washington, DC 20006	18K C00008839 Occupation non-affiliated	10/30/78	500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 700.00		
Special Political Agricultural Comm. Ed. 609 Portland Bldg. 200 Broadway, Louisville, Kentucky	18K C00003772 Occupation non-affiliated	10/26/78	200.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 200.00		
Suffolk County Democratic Campaign 941 Patchogue-Holbrook Road Holbrook, NY	Spec. Acc't. #2 18K C00073396 Occupation non-affiliated	11/6/78	3000.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 3000.00		
Jim Wright Majority Congress Committee PO Box 231 Rockville, Md	18K C00078410 Occupation non-affiliated	11/3/78	500.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1500.00		
Truck Operators Non Partisan Committee 4301 St. SE, Washington, DC	18K C00002881 Occupation non-affiliated	10/26/78	250.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00		
International Union of Electrical Radio, and Machine Workers- COPE 875 Murray Hill Pkwy, E. Rutherford, NJ	18K U Occupation non-affiliated	11/2/78 11/2/78	300.00 20.00
Receipt for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 320.00		

SUBTOTAL of receipts this page (optional) \$
 TOTAL this period (last page this line number only)

3040395422



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1979

Leonard De Prospro, Treasurer
Citizens for Downey '78
P. O. Box 91P
Bay Shore, NY 11706

Dear Mr. De Prospro:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 30 Day Post General Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

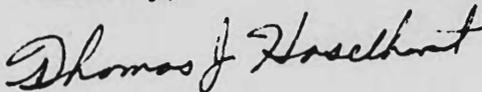
The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

83040395543

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Lorrie Castaneda (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4172.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director

Enclosure

8 3 9 0 4 0 3 4 9 2 5 4 5 3

TOM DOMINAY

CONGRESSMAN

NOV 8 1979

REGULAR MAIL

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

035602

Re: 45V1/79-97LC

Dear Sir:

Enclosed please find copy of check in the amount of \$2000.00 that the committee has returned to the Suffolk County Democratic Committee as per your letter of October 16, 1979.

At the time of the contribution, this committee was unaware that they were not an official multicandidate committee.

The transaction will be shown on our next report.

Sincerely,

Leonard DeProspero
Leonard DeProspero
Treasurer

NOV 14 1979
HOUSE OF REPRESENTATIVES

LDP:jdp
Enc.

8 3 0 4 0 3 9 3 7 2

9 3 8 9 9 3 8 5 5 4 6

CITIZENS FOR DOWNEY #78

620

50-903/214

PAY TO THE ORDER OF

11/10 1977
11/10 1977
5000.00
Five Thousand DOLLARS



MANUFACTURERS HANOVER
TRUST COMPANY
110 61ST MAIN STREET
RAY BRUCE, N.Y. 11706

MEMO

⑆02⑆409033⑆ ⑆0⑆ 162730⑆0⑆

DISBURSEMENTS
 (Operating, Traveling Cost, Contributions to-Kind,
 Loans, Loan Repayments and Refunds Model
 Supporting Lines 21a, 21b, and 22a, 22b, and 22c
 of FBO FORM 9)

Page 2 of 2
 Line Number 211

Use General Schedule for
 each numbered line

104-30049-1972517

Name of Candidate or Committee in Full			
CITIZENS FOR DOWNEY '78			
Full Name, Mailing Address and ZIP Code Wayne Prospect Election Committee 43 Seaward Ave. Dix Hills, N.Y. 11746	Particulars of Expenditure donation	Date (month, day, year) 10/9/79	Amount of each expenditure this period \$0.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Norman Peyser Committee 713 Highbridge Rd. North Babylon, N.Y. 11702	Particulars of Expenditure donation	Date (month, day, year) 10/9/79	Amount of each expenditure this period \$0.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Eugene Reed Election Committee 510 Albany Ave. Amityville, N.Y. 11701	Particulars of Expenditure donation	Date (month, day, year) 10/9/79	Amount of each expenditure this period \$0.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Committee to Elect Feldman Dix Hills, N.Y. 11746	Particulars of Expenditure donation	Date (month, day, year) 10/9/79	Amount of each expenditure this period \$00.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code Suffolk County Democratic Committee Veterans Memorial Highway Hauppauge, N.Y.	Particulars of Expenditure tickets return as per attached	Date (month, day, year) 10/9/79 11/6/79	Amount of each expenditure this period 100.00 2000.00
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other		
SUBTOTAL of expenditures this page (fractional).....			\$
TOTAL this period (use page this line number only).....			\$ 3575.00

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE March 24, 1980 ANALYST Ed Ryan EDR
 TO: Office of General Counsel TEAM CHIEF Peter Kell, Jr. [Signature]
 THROUGH: STAFF DIRECTOR [Signature] COMPLIANCE REVIEW Bowen/Sims [Signature]
 FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS [Signature]

CANDIDATE/COMMITTEE: Citizens for John Randolph Committee NY/02 C00095299
 TREASURER: Paul S. Rosen
 ADDRESS: La Bonne Vie Apts. Bldg. 34C
 East Patchogue, New York 11772

AFFILIATE(S): N/A

ALLEGATION(S): Excessive contribution from a Non-qualified committee CITE: 2 U.S.C. 441a(a) ATTACHMENT(S) #2

DATE INITIATED:

10-10-79

MANNER IN WHICH REVIEW WAS INITIATED:

Normal Review Other:
 Special Project:

ATTACHMENT

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM 10-3-78 TO 10-23-78

TOTAL RECEIPTS \$ <u>23,294.52</u>	TOTAL EXPENDITURES \$ <u>15,043.62</u>
CASH ON HAND \$ <u>13,161.62</u>	Debts owed to Cmte. <u>3,000.00</u>
	DEBTS \$ " " by Cmte. <u>3,500.00</u>

HISTORY:

RESULTS OF REVIEW: ATTACHMENT

Surface violation letter for the 10 Day Pre-Election Report sent 10-16-79.

#3

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon 12-05-79
Telecon 12-20-79

#4
#5

REASON(S) FOR REFERRAL:

ATTACHMENT

No response to Surface Violation Notice; Excessive contribution has not been refunded; and meets RAD threshold for referral

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

N/A

OTHER RELEVANT INFORMATION:

ATTACHMENT

Refer to Ambro's referral
 " " Downey's " " "
 " " Suffolk County Democratic Committee referral

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution in-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
Citizens for John F. Randolph Committee			
Full Name, Mailing Address and ZIP Code Aite Underwriters Political Action Comm. Inc. 18K 1422 F Street N.W. Washington, DC 20006 CO0005249	Principal Place of Business 1422 F Street N.W. Washington, DC. 20006 Occupation CODE/PAC	Date (month, day, year) 10/17/78	Amount of each Receipt this Period \$ 350.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code IBPAF Political Action Together 1750 K Street N.W. Washington, DC 20006 18K CO0000885	Principal Place of Business 1750 K Street N.W. Washington, DC 20006 Occupation CODE/PAC	Date (month, day, year) 10/17/78	Amount of each Receipt this Period \$ 800.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code Jim Wright Majority Congress Comm. Inc. 32 Court House Square Baltimore, MD 21201 18K CO0078910	Principal Place of Business 32 Court House Square Baltimore, MD. 21201 Occupation CODE/PAC	Date (month, day, year) 10/19/78	Amount of each Receipt this Period \$ 500.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code Suburban Educational Corp. Civil Service Employees Ass. 2525 29th St Bridge City 15001 184	Principal Place of Business 2525 29th St Bridge City, PA 15001 Occupation CODE/PAC	Date (month, day, year) 10/19/78	Amount of each Receipt this Period \$ 200.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code Suffolk County Dem Co. 165 Memorial Highway Hauppauge, NY 184 CO0073346	Principal Place of Business 165 Memorial Highway Hauppauge, NY Occupation CODE/PAC	Date (month, day, year) 10/16/78	Amount of each Receipt this Period \$ 4.00
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code National Committee on Economic 505 C Street N.W. Washington, DC 20002	Principal Place of Business 505 C Street N.W. Washington, DC 20002 Occupation Targeting Survey	Date (month, day, year) 10/17/78	Amount of each Receipt this Period (in kind)
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
Full Name, Mailing Address and ZIP Code Tribune Trust Co. 185 Great Neck Rd. Great Neck, NY 11021	Principal Place of Business 185 Great Neck Rd. Great Neck, NY 11021 Occupation Corporate Headquarters Personnel	Date (month, day, year) 10/17/78	Amount of each Receipt this Period 600 (in kind)
Receipt for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other	<input type="checkbox"/> Check if Contributor is self-employed Aggregate Year-To-Date \$		
SUBTOTAL of receipts this page (optional)			\$ 5,250.00
TOTAL this period (last page this line number only)			\$ 14,050.00

8 3 7 4 10 13 19 25 31 41 51
 see sub A, line 14 H

3 3 0 4 0 3 9 5 5 0
 FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS (C) 1977-1978

DATE 14 FEB 80
 PAGE 1

HOUSE

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
SIZES FOR JOHN F. RANDOLPH COMMITTEE								ID# C00095299
1978	STATEMENT OF ORGANIZATION					15MAY78	3	78HSE/136/0224
	STATEMENT OF ORGANIZATION- AMENDMENT					26MAY78	3	78HSE/136/2609
	48 HOUR CONTRIBUTION NOTICE					31OCT78	1	78HSE/154/2110
	48 HOUR CONTRIBUTION NOTICE					3NOV78	1	78HSE/154/4916
	48 HOUR CONTRIBUTION NOTICE					9NOV78	1	78HSE/155/1438
	48 HOUR CONTRIBUTION NOTICE					13NOV78	1	78HSE/155/1756
	15 DAY PRE-PRIMARY	6,760		7,672		1JUL78 -20AUG78	0	78HSE/144/4157
	JULY 10 QUARTERLY	13,925		4,600		14APR78 -30JUN78	12	78HSE/141/2954
	JULY 10 QUARTERLY - AMENDMENT					14APR78 -30JUN78	5	78HSE/144/4119
	OCTOBER 10 QUARTERLY	13,490		14,983		27AUG78 -30SEP78	11	78HSE/150/4019
	15 DAY PRE-GENERAL		23,294		15,043	30OCT78 -23OCT78	15	78HSE/153/0235
	REQUEST FOR ADDITIONAL INFORMATION					30OCT78 -23OCT78	2	79FEC/120/3563
	15 DAY PRE-GENERAL - AMENDMENT					23OCT78	5	79HSE/163/1977
	15 DAY PRE-GENERAL - AMENDMENT					23OCT78	1	79HSE/163/1964
	15 DAY POST- GENERAL PRIMARY		9	0		10OCT78 - 20OCT78	5	78HSE/150/3052
	15 DAY POST-GENERAL		25,068		30,758	24OCT78 -27NOV78	19	78HSE/150/0506
	15 DAY POST-GENERAL - AMENDMENT		25,068		30,758	24OCT78 -27NOV78	19	78HSE/160/2138
	REQUEST FOR ADDITIONAL INFORMATION					24OCT78 -27NOV78	1	79FEC/120/3566
	15 DAY POST-GENERAL - AMENDMENT		25,068		30,758	24OCT78 -27NOV78	2	79HSE/161/3318
	15 DAY POST-GENERAL - AMENDMENT					27NOV78	3	79HSE/163/1974
	YEAR END REPORT		306		3,646	20NOV78 -31DEC78	7	79HSE/161/3311
	YEAR END REPORT - AMENDMENT					31DEC78	1	79HSE/163/1968
	TOTAL	34,175	48,668	29,263	49,447		126	TOTAL PAGES



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1979

Paul S. Rosen, Treasurer
Citizens for John Randolph
P. O. Box 134
Blue Point, New York 11715

Dear Mr. Rosen:

This letter is prompted by the Commission's interest in assisting candidates and committees who wish to comply with the Federal Election Campaign Act, as amended. During review of the 10 Day Pre-General Election Report of Receipts and Expenditures, we noticed an entry indicating that you may have received a contribution which exceeds the limits set forth in the Act. A copy of that portion of your report is attached so that a review of your records can be made.

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5
5
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3
4
0
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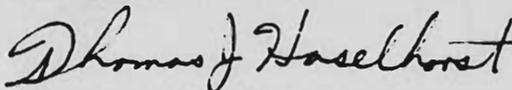
The Act precludes individuals and political committees, other than multicandidate committees, from making political contributions to a candidate for Federal election in excess of \$1,000 per election. The Act defines a multicandidate committee as one which has been registered for a period of not less than six months; has received contributions from more than fifty persons; and has made contributions to five or more candidates for Federal office. The committee listed as the source of the contribution in question does not presently qualify as a multicandidate committee and we have notified them accordingly. We have recommended that the source committee notify you if it is confirmed that the contribution was in excess of the limits.

The Commission recommends that if you find the contribution you received was in excess of the limits set forth in the Act you return the amount in excess of \$1,000 to the donor. This return should be reported immediately by letter and should be reflected as a contribution refund on your next report of receipts and expenditures. If you find that the entry in question is incomplete or incorrect, please submit a statement which would clarify this particular matter for the public record. You may do so by amending your original report by letter.

FOR
b. 15

Please notify the Commission within fifteen (15) days from the date of this letter of the determination made on this matter. If you have any questions concerning this matter, please do not hesitate to contact Lorrie Castaneda (800)424-9530, our Reports Analyst assigned to you. Our local telephone number is (202)523-4172.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director

Enclosure

83040314953564

MEMORANDUM: FOR FILES

RE: TELECON

FROM: Paul Rosen to Susan Weber

DATE: 12/5/79

NAME OF COMMITTEE: Citizens for John Randolph/ NY - 1

I spoke with Mr. Rosen since Lorrie Castaneda had since departed from the Commission. The committee had received a surface violation letter (SV179-95LC) concerning the acceptance of an excessive contribution from a county organization that they assumed to be a multicandidate committee. The original violation occurred more than a year ago and the committee is still reporting only because they have a debt of \$3500 that he said they cannot pay off since the candidate is destitute, getting a divorce, etc. etc. He wanted to know what they should do since they cannot even pay off the debt from their committee much less refund \$3000 as the surface letter details. I told him that unfortunately, the commission will expect him to take some action to collect the money, etc.

I told him that he could call back (as he is a salesman and cannot be reached) tomorrow and I would talk to someone and advise him in this situation. After talking to Peggy Sims, I will instruct him to send in a letter detailing the situation and let the commission take it from there.

8304039553

Telecon:

Greevy with Kevin Brosnahan
Suffolk County Democratic Committee
12/20/79
516-661-8631

Please note that I called Downey's office (516/661-8777) and was informed that KB does not work there.

I called KB to ask him what the status was regarding the excessive contributions made to Ambro, Downey, and Randolph by the committee.

He stated that the committee received refunds from Ambro and Downey. He stated further that Randolph's campaign has no money and that Randolph lost a local election in November, so he's probably further in debt.

I told KB that we would like to have a letter regarding the current status of the situation, i.e. refunds received for Ambro and Downey, and a statement regarding any requests made by the committee to Randolph for the refund.

I asked specifically if the committee had requested the refund from Randolph. KB stated that he would have to call back next week as he's been quite busy with plans for delegate selection and other matters, and he was hoping to work on this matter on Saturday.

He agreed to call Thursday next.

I told him again that we should have a letter as soon as possible regarding the current status of the matters.

330403955



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1217

Date Filmed 6/16/83 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

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

83040400104

THE FOLLOWING MATERIAL IS BEING ADDED TO THE
PUBLIC FILE OF CLOSED MUR 1217.



204446

RECEIVED BY THE FEC
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83 MAR 30 PIZ: 00

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
919 THIRD AVENUE
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(302) 429-9200

March 28, 1983

67

R. Lee Andersen
Federal Election Commission
Washington, D.C. 20463

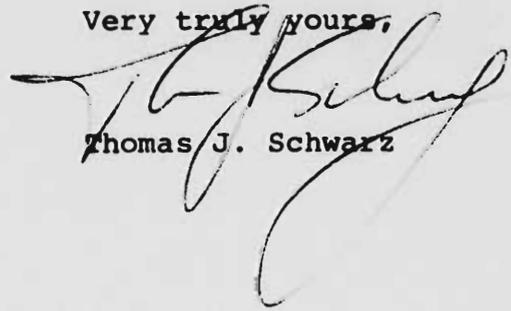
Re: MUR 1217

Dear Mr. Andersen:

Citizens for Downey Committee wishes to place on the public record the following information:

Affidavits submitted in connection with this proceeding indicate that the alleged violation occurred as a result of a failure of the contributor, the Suffolk County Democratic Committee, to understand the requirements necessary to attain multi-candidate committee status and that the Treasurer of Citizens for Downey inquired upon receipt of the contribution whether the funds were drawn from a special federal account that met the requirements of the FEC and was informed that they were. There is no evidence in the record that Congressman Downey was aware of the excess nature of the contribution.

Very truly yours,



Thomas J. Schwarz

83040400105

SKADDEN, ARPS, SLATE, MEAGHER & FLOM
919 THIRD AVENUE
NEW YORK 10022-6931



Mr. R. Lee Andersen
Federal Election Commission
1325 K Street, N.W.
Washington, D. C. 20463

8304040010





FEDERAL ELECTION COMMISSION

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

END OF ADDITIONAL MATERIAL FOR CLOSED MUR 1217.

83040400107

