FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR #: 1845

Date Filmed 6/30/86 Camera No. --- 2

Cameraman AS

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(1) Routing Slips (2) 12 Day Reports

(3) Comment Sheets (4) Internal Memos

(5) Conciliation information

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):

___	(1) Classified Information	___	(6) Personal privacy
✓	(2) Internal rules and practices	___	(7) Investigatory files
✓	(3) Exempted by other statute	___	(8) Banking Information
___	(4) Trade secrets and commercial or financial information	___	(9) Well Information (geographic or geophysical)
✓	(5) Internal Documents		

Signed S K Lewfeld

date 6/26/86

FEC 9-21-77

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Kleinfeld

GCC#460

86 MAY 12 P2:37

JUAN A. SCOTT D/B/A
SCOTT ASSOCIATES
POST OFFICE BOX 3066
NEW HAVEN, CT 06515

1554

5-8 1986

51-1
111

PAY TO THE ORDER OF TREASURER of the United States $ 200.00

Two hundred and 00/100 DOLLARS

First Bank
224 Dixwell Avenue
New Haven
Connecticut 06511

MEMO FEC Mur 1845
Urban Coalition

Juan A. Scott

⑆011100012⑆ 11709232⑈ 1554

8604074309

GCC#460

MEMORANDUM

TO: Debra A. Reed

TO: Judy Smith

FROM: Judy Smith

FROM: Debra A. Reed

CHECK NO. 1554 (a copy of which is attached) RELATING TO MUR 1845 AND NAME Urban Coalition, Juan Scott, Treasurer WAS RECEIVED ON 5/12/86. PLEASE INDICATE THE ACCOUNT INTO WHICH IT SHOULD BE DEPOSITED:

/ / BUDGET CLEARING ACCOUNT (#95F3875.16).

/✓/ CIVIL PENALTIES ACCOUNT (#95-1099.160)

/ / OTHER _____

SIGNATURE Debra A. Reed DATE 5/13/86

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 2, 1986

Juan Scott, treasurer
Urban Coalition
150 Roger White Drive
New Haven, Connecticut 06511

Re: MUR 1845
Urban Coalition and
Juan Scott, as
treasurer

Dear Mr. Scott:

On April 7, 1986, you were notified that the Federal Election Commission accepted a conciliation agreement signed by you in settlement of violations of 2 U.S.C. § 434(a) and § 441d, provisions of the Federal Election Campaign Act of 1971, as amended. That conciliation agreement provided for the payment of a civil penalty of $200, pursuant to paragraph VII. In addition, the agreement provided for the filing of the appropriate report(s) of the Coalition's political activity for the 1984 general election, pursuant to paragraph VI.

The Urban Coalition and you, as treasurer, were required to comply with and implement the requirements of the agreement within 30 days of its effective date and to so notify the Commission. See paragraph XI. As of the date of this letter, neither the civil penalty nor the required report(s) have been received.

If the Commission believes that this agreement or any requirement contained therein has been violated, it may institute a civil action for relief in the United States District Court in the District of Columbia. See paragraph IX. Accordingly, please remit the civil penalty and file the appropriate report(s) by May 16, 1986, or the Office of General Counsel will recommend further action by the Commission.

86040594310

Should you have any questions, please direct them to Eric Kleinfeld, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

85040594311

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Juan Scott, treasurer
Urban Coalition
150 Roger White Drive
New Haven, Connecticut 06511

Re: MUR 1845
Urban Coalition and
Juan Scott, as
treasurer

Dear Mr. Scott:

On April 7, 1986, you were notified that the Federal Election Commission accepted a conciliation agreement signed by you in settlement of violations of 2 U.S.C. § 434(a) and § 441d, provisions of the Federal Election Campaign Act of 1971, as amended. That conciliation agreement provided for the payment of a civil penalty of $200, pursuant to paragraph VII. In addition, the agreement provided for the filing of the appropriate report(s) of the Coalition's political activity for the 1984 general election, pursuant to paragraph VI.

The Urban Coalition and you, as treasurer, were required to comply with and implement the requirements of the agreement within 30 days of its effective date and to so notify the Commission. See paragraph XI. As of the date of this letter, neither the civil penalty nor the required report(s) have been received.

If the Commission believes that this agreement or any requirement contained therein has been violated, it may institute a civil action for relief in the United States District Court in the District of Columbia. See paragraph IX. Accordingly, please remit the civil penalty and file the appropriate report(s) by May 16, 1986, or the Office of General Counsel will recommend further action by the Commission.

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Should you have any questions, please direct them to Eric Kleinfeld, the attorney assigned to this matter, at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1986

Vincent E. Mauro, Chairman
New Haven Democratic Town Committee
823 Edgewood Avenue
New Haven, Connecticut 06515

Re: MUR 1845

Dear Mr. Mauro:

This is in reference to the complaint you filed with the Commission on November 5, 1984.

The Commission determined that there was reason to believe that the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. §§ 434(a), 441a(f), and 441d, provisions of the Federal Election Campaign Act of 1971, as amended and conducted an investigation in this matter. On April 1 , 1986, a conciliation agreement signed by the respondent was accepted by the Commission concerning the violation of 2 U.S.C. § 434(a) and § 441d. A copy of this agreement is enclosed for your information.

Additionally, the Commission concluded on April 1 , 1986, that there was no probable cause to believe that the DeNardis for Congress Committee and Martin R. Anastasio, Jr., as treasurer, and Wendell Harp violated the Act. Finally, the Commission also concluded on April 1, 1986, that there was no probable cause to believe that the Urban Coalition violated 2 U.S.C. § 441a(f). Accordingly, the file in this matter, numbered MUR 1845, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a Complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

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

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1986

Wendell Harp
74 Dwight Street
New Haven, Connecticut 06511

RE: MUR 1845
Wendell Harp

Dear Mr. Harp:

This is to advise you that after an investigation was conducted, the Commission concluded on April 1, 1986, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1845, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Eric Kleinfeld the attorney assigned to handle this matter at (202)376-5690.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1986

Martin R. Anastasio, Jr. treasurer
DeNardis for Congress Committee
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

RE: MUR 1845
DeNardis for Congress
Committee
Martin R. Anastasio, Jr.,
treasurer

Dear Mr. Anastasio:

This is to advise you that after an investigation was conducted, the Commission concluded on April 1, 1986, that there is no probable cause to believe that the DeNardis for Congress Committee and you, as treasurer, violated the Act. Accordingly the file in this matter, numbered MUR 1845, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Eric Kleinfeld the attorney assigned to handle this matter at (202)376-5690.

Sincerely,

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 7, 1986

Juan Scott, treasurer
Urban Coalition
150 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition and Juan
Scott, treasurer

Dear Mr. Scott:

On April 1 , 1986, the Commission accepted the conciliation agreement signed by you in settlement of violations of 2 U.S.C. § 434(a) and § 441d, provisions of the Federal Election Campaign Act of 1971, as amended.

Additionally, after an investigation was conducted, the Commission concluded also on April 1 , 1986, that there is no probable cause to believe that the Urban Coalition and you, as treasurer, violated 2 U.S.C. § 441a(f).

Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. If you have any questions, contact Eric Kleinfeld, the attorney assigned to handle this matter at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Wendell Harp
74 Dwight Street
New Haven, Connecticut 06511

RE: MUR 1845
Wendell Harp

EK

Dear Mr. Harp:

This is to advise you that after an investigation was conducted, the Commission concluded on , 1986, that there is no probable cause to believe that you violated the Act. Accordingly the file in this matter, numbered MUR 1845, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Eric Kleinfeld the attorney assigned to handle this matter at (202)376-5690.

Sincerely,

Charles N. Steele
General Counsel

RLF

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Martin R. Anastasio, Jr. treasurer
DeNardis for Congress Committee
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

EK

RE: MUR 1845
DeNardis for Congress
Committee
Martin R. Anastasio, Jr.,
treasurer

Dear Mr. Anastasio:

This is to advise you that after an investigation was conducted, the Commission concluded on , 1986, that there is no probable cause to believe that the DeNardis for Congress Committee and you, as treasurer, violated the Act. Accordingly the file in this matter, numbered MUR 1845, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days.

If you have any questions, contact Eric Kleinfeld the attorney assigned to handle this matter at (202)376-5690.

Sincerely,

Charles N. Steele
General Counsel

RLF

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Juan Scott, treasurer
Urban Coalition
150 Roger White Drive
New Haven, Connecticut 06511

EK

RE: MUR 1845
Urban Coalition and Juan
Scott, treasurer

Dear Mr. Scott:

On , 1986, the Commission accepted the conciliation agreement signed by you in settlement of violations of 2 U.S.C. § 434(a) and § 441d, provisions of the Federal Election Campaign Act of 1971, as amended.

Additionally, after an investigation was conducted, the Commission concluded also on , 1986, that there is no probable cause to believe that the Urban Coalition and you, as treasurer, violated 2 U.S.C. § 441a(f).

Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files. If you have any questions, contact Eric Kleinfeld, the attorney assigned to handle this matter at (202) 376-5690.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Vincent E. Mauro, Chairman
New Haven Democratic Town Committee
823 Edgewood Avenue
New Haven, Connecticut 06515

Re: MUR 1845 EK

Dear Mr. Mauro:

This is in reference to the complaint you filed with the Commission on November 5, 1984.

The Commission determined that there was reason to believe that the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. §§ 434(a), 441a(f), and 441d, provisions of the Federal Election Campaign Act of 1971, as amended and conducted an investigation in this matter. On , 1986, a conciliation agreement signed by the respondent was accepted by the Commission concerning the violation of 2 U.S.C. § 434(a) and § 441d. A copy of this agreement is enclosed for your information.

Additionally, the Commission concluded on , 1986, that there was no probable cause to believe that the DeNardis for Congress Committee and Martin R. Anastasio, Jr., as treasurer, and Wendell Harp violated the Act. Finally, the Commission also concluded on , 1986, that there was no probable cause to believe that the Urban Coalition violated 2 U.S.C. § 441a(f). Accordingly, the file in this matter, numbered MUR 1845, has been closed. This matter will become part of the public record within 30 days. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Federal Election Campaign Act allows a Complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

RHF

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

Sincerely,

Charles N. Steele
General Counsel

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RECEIVED BY THE FEC
G.C. 9855
86 FEB 28 A9:26

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1845
Urban Coalition	)	
Juan Scott, treasurer	)	

86 FEB 28 P12:54
GENERAL COUNSEL

CONCILIATION AGREEMENT

This matter was initiated by a signed, sworn, and notarized complaint by Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee. The Commission found reason to believe that the Urban Coalition and Juan Scott, as treasurer, ("Respondents") violated 2 U.S.C. § 434(a) by failing to file required reports and 2 U.S.C. § 441d by failing to place a disclaimer on campaign posters, and an investigation was conducted.

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

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

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

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

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

1. Respondent Urban Coalition is a political committee within the meaning of 2 U.S.C. § 431(4).

2. Respondent Juan Scott currently serves as treasurer for the Urban Coalition.

3. Respondents filed their 1984 October Quarterly Report on October 26, 1984.

4. Respondents failed to file a 1984 12 Day Pre-general Election Report, a 30 Day Post-general Election report and a Year-end report.

5. Section 434(a)(4), Title 2, United States Code, requires all unauthorized political committees to file an October Quarterly report no later than October 15 in a year during which a regularly scheduled general election is held.

6. Section 434(a)(4), Title 2, United States Code, requires all unauthorized political committees to file a 12 Day Pre-general Election report, a 30 Day Post-general Election report and a Year-end report, during a year in which a regularly scheduled general election is held.

7. Respondents published, paid for and displayed posters advocating the election of Lawrence DeNardis in Connecticut's third congressional district. The posters did not contain a disclaimer.

8. Section 441d, Title 2, United States Code requires any person who pays for an unauthorized communication advocating

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the election of a candidate to federal office, to affix a disclaimer to that communication stating the name of the person who paid for the communication and stating that the communication was not authorized by the candidate.

V. 1. Respondents violated 2 U.S.C. § 434(a)(4) by failing to file their 1984 October Quarterly report until October 26, 1984, eleven days after it was due.

2. Respondents violated 2 U.S.C. § 434(a)(4) by failing to file their 1984 12 Day Pre-general, 30 Day Post-general or Year-end reports.

3. Respondents violated 2 U.S.C. § 441d by failing to affix a disclaimer to posters advocating the election of Lawrence DeNardis.

VI. Respondents will file a 12 Day Pre-general, 30 Day Post-general and Year-end reports for the 1984 general election, or in lieu thereof, respondents will file a single comprehensive report containing all political activity between October 12, 1984 and December 31, 1984, inclusive.

VII. Respondents will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred Dollars ($200), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VIII. Respondents agree that they shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. § 432, et seq.

XI. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 436g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this

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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.

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

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

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

FOR THE COMMISSION:

Charles N. Steele
General Counsel

BY: Kenneth A. Gross (RGT) 4/4/86
Kenneth A. Gross
Associate General Counsel
Date

FOR THE RESPONDENT:

Juan Scott 2-20-86
Juan Scott
Treasurer
Date

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Urban Coalition	)	
Juan Scott, treasurer	)	MUR 1845
DeNardis for Congress Committee	)	
Martin R. Anastasio, Jr.	)	
Wendell Harp	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of April 1, 1986, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1845:

1. Find no probable cause to believe the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

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

3. Find no probable cause to believe that the DeNardis for Congress Committee and Martin R. Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b).

4. Accept the conciliation agreement signed by Juan Scott, treasurer of the Urban Coalition.

5. Approve the letter attached to the General Counsel's report dated March 14, 1986.

6. Close the file.

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

Attest:

4-2-86
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

In the Matter of	)
	)
Urban Coalition	)
Juan Scott, treasurer	)
DeNardis for Congress Committee	)
Martin R. Anastasio, Jr.	)
Wendell Harp	)

MUR 1845

SENSITIVE
EXECUTIVE SESSION
APR 1 1986

GENERAL COUNSEL'S REPORT

I. BACKGROUND

This matter was initiated by a signed, sworn and notarized complaint by Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee, alleging violations of 2 U.S.C. §§ 434, 441a and 441d. On March 12, 1985, the Federal Election Commission ("Commission") made the following reason to believe determinations:

> (1) that the Urban Coalition ("Coalition") and Juan Scott, as treasurer, violated 2 U.S.C. §§ 434(a), 441a(f) and 441d, by failing to file reports, accepting an excessive contribution from Wendell Harp, and failing to affix a proper disclaimer on a campaign poster;
>
> (2) that the DeNardis for Congress Committee ("DeNardis Committee") and Martin R. Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b) by failing to report the receipt of an in-kind contribution from the Urban Coalition;
>
> (3) that Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the Coalition and the DeNardis Committee which exceed the limitations.

Respondents were notified of these determinations, and on May 25, 1985, the Commission issued a subpoena and order to assist in the investigation of this matter. On October 28, 1985, the Coalition amended its 1984 October Quarterly report, disclosing an independent expenditure on behalf of the DeNardis

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Committee, rather than an in-kind contribution. Also on this date, the Coalition requested to enter into pre-probable cause conciliation with the Commission.

On January 22, 1986, the Commission decided to enter into conciliation with the Coalition and Juan Scott, as treasurer, prior to a finding of probable cause to believe for violations of 2 U.S.C. §§ 434(a) and 441d. As to the violations of 2 U.S.C. § 441a(f) by the Coalition, § 441a(a)(1)(A) by Wendell Harp, and § 434(b) by the DeNardis Committee, the Office of General Counsel mailed briefs to the respondents on February 12, 1986.

A signed conciliation agreement was received from Juan Scott, the Coalition's treasurer, on February 28, 1986.

II. LEGAL ANALYSIS

See the General Counsel's Briefs dated February 11, 1986. Respondents did not file response briefs in this matter.

With regard to the violations discussed in the briefs, the Office of General Counsel recommends that the Commission find no probable cause to believe that the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f); no probable cause to believe that Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A); and no probable cause to believe that the DeNardis Committee violated 2 U.S.C. § 434(b).

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IV. RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Find no probable cause to believe the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

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

3. Find no probable cause to believe that the DeNardis for Congress Committee and Martin R. Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b).

4. Accept the conciliation agreement signed by Juan Scott, treasurer of the Urban Coalition.

5. Approve the attached letters.

6. Close the file.

14 March 1988
Date

Charles N. Steele
General Counsel

Attachments
1. Conciliation agreement (1)
2. Letters

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY
86 FEB 12 P3:15

SENSITIVE

February 13, 1986

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: MUR 1845

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. Copies of the briefs and a letter notifying the respondents of the General Counsel's intent to recommend to the Commission findings of no probable cause to believe were mailed on February 12 , 1986. Following receipt of the respondents' replies to this notice, this Office will make a further report to the Commission.

Attachments
1. Briefs
2. Letters to Respondents

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Urban Coalition	)	MUR 1845
Juan Scott, treasurer	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

This matter was initiated by a complaint filed with the Federal Election Commission ("Commission") by Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee against the Urban Coalition ("Coalition") and Juan Scott, as treasurer, alleging that the Coalition solicited, accepted and disbursed funds in excess of the contribution limitations of 2 U.S.C. § 441a. On March 12, 1985, the Commission determined there was reason to believe that the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

The Coalition failed to respond to the Commission's reason to believe determinations. On May 21, 1985, the Commission authorized a subpoena to produce documents and an order to submit written answers for the Coalition. The Coalition's response was received on July 23, 1985, and additional information was received from the Coalition on October 18, 1985.

II. Legal Analysis

The Commission's determination was based on contributions by Wendell Harp of $1000 to the Coalition and $1000 to the DeNardis for Congress Committee ("DeNardis Committee") and an allegation in the complaint that the Urban Coalition was a single candidate committee. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may contribute in excess of $1000 to a candidate and his authorized

political committee with respect to any election to federal office. However, an individual may contribute to a candidate (or his authorized political committee) with respect to a particular election and also contribute to a political committee supporting the same candidate in the same election as long as, inter alia, the committee is not a single candidate committee or an authorized committee.

The Urban Coalition is a registered multi-candidate committee. Although the Urban Coalition was only able to raise a limited amount of funds and thus made an expenditure only for Larry DeNardis, the coalition denies that its sole or principal purpose was to assist the DeNardis campaign. Mr. Scott, in a sworn response, states that he was not authorized to raise or expend money for DeNardis. Mr. Harp, the contributor, states that he did not believe that the Urban Coalition existed solely to support DeNardis, nor did he have any reason to suspect so from the solicitation letter he received.

Although the Coalition's solicitation letter to Mr. Harp advocates support for DeNardis' candidacy, no evidence has been produced suggesting that Wendell Harp intended to make a contribution to DeNardis through the Coalition. Mr. Harp intended to make a contribution to a multicandidate committee. Since the Coalition is not an authorized committee of candidate DeNardis, nor a single candidate committee, it was permitted to solicit and accept the $1000 contribution from Wendell Harp. Accordingly, the Office of General Counsel recommends that the Commission find no probable cause to believe that the Urban

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Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

III. General Counsel's Recommendations

The Office of General Counsel recommends that the Commission:

1. Find no probable cause to believe that the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

12 Feb. 1986
Date

Charles N. Steele
General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
DeNardis for Congress	)	MUR 1845
Martin R. Anastasio, Jr.,	)	
treasurer	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

This matter was initiated by a complaint filed with the Federal Election Commission ("Commission") by Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee against DeNardis for Congress ("DeNardis Committee") alleging that the latter failed to report the receipt of an in-kind contribution from the Urban Coalition. On March 12, 1985, the Commission determined there was reason to believe that the DeNardis Committee and Martin R. Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b).

The DeNardis Committee responded to the Commission's determination by letter dated April 10, 1985.

II. Legal Analysis

The subject of the purported in-kind contribution from the Urban Coalition to the DeNardis Committee, as alleged in the complaint, were campaign posters displayed throughout the third congressional district of Connecticut, advocating the election of Larry DeNardis to the United States House of Representatives. The Urban Coalition originally reported the posters as an in-kind contribution to the DeNardis Committee, whereas the latter failed to report any in-kind contributions received from the Urban Coalition.

Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

III. General Counsel's Recommendations

The Office of General Counsel recommends that the Commission:

1. Find no probable cause to believe that the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

12 Feb. 1986
Date

Charles N. Steele
General Counsel

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Pursuant to 2 U.S.C. § 434(b), all contributions, including in-kind contributions, must be disclosed by the recipient. However, the DeNardis Committee informed the Commission that all contributions received by it were disclosed to the Commission and that no in-kind contributions were received from the Urban Coalition. The DeNardis Committee claims that any expenditures made by the Urban Coalition were independent expenditures rather than an in-kind contribution.

The Committee's claim is corroborated by the correspondence received from the Urban Coalition. The Coalition amended its report on file with the Commission to show a $100 independent expenditure on behalf of Larry DeNardis. The Coalition also stated that the campaign posters were produced and distributed solely by them, without communication or consultation with the DeNardis Committee. Accordingly, the Office of General Counsel recommends that the Commission find no probable cause to believe that the DeNardis Committee and Martin R. Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b).

III. General Counsel's Recommendations

The Office of General Counsel recommends that the Commission:

1. Find no probable cause to believe that the DeNardis for Congress Committee and Martin R. Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b).

12 Feb. 1986
Date

Charles N. Steele
General Counsel

8604079437

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1845
Wendell Harp	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

This matter was initiated by a complaint filed with the Federal Election Commission ("Commission") by Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee against Wendell Harp, alleging that Mr. Harp made contributions to the Urban Coalition ("Coalition") and the DeNardis for Congress Committee ("DeNardis Committee") which, when aggregated, exceeded the contribution limitations of 2 U.S.C. § 441a(a)(1)(A). On March 12, 1985, the Commission determined there was reason to believe that Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A). A response was received from Mr. Harp on April 30, 1985.

II. Legal Analysis

Wendell Harp made a $1000 contribution to the DeNardis Committee for the 1984 general election. Mr. Harp also made a $1000 contribution to the Urban Coalition for the 1984 general election. The Urban Coalition in turn made an independent expenditure of $100 on behalf of Larry DeNardis.

Pursuant to 11 C.F.R. § 110.1(h), an individual may contribute to a candidate or his authorized committee with respect to a particular election and also contribute to a political committee supporting the same candidate in the same election as long as:

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1. the committee is not the candidate's principal campaign committee, an authorized committee or a single candidate committee;

2. the contributor does not give with the knowledge that a substantial portion of the contribution will be expended on that same candidate for the same election; and

3. the contributor does not retain control over the funds.

The investigation of this matter revealed that the Urban Coalition was a multicandidate committee. Although Mr. Harp was a member of the "DeNardis finance committee," he claims not to have known from the Coalition's solicitation letter that a portion of his contribution would be spent on the DeNardis campaign. 1/ He also states that he had no control over the Coalition's expenditures.

Although the Coalition's solicitation letter to Mr. Harp advocates support for DeNardis' candidacy, no evidence has been produced suggesting that Wendell Harp intended to make a contribution to DeNardis through the Coalition. Mr. Harp intended to make a contribution to a committee which, to his belief, was a multicandidate committee. The fact that the Coalition used a portion of his contribution for an expenditure on behalf of DeNardis is not sufficient to establish a contribution from Harp to DeNardis.

1/ Only $100 was spent by the Coalition to support the DeNardis campaign, an amount equal to one-tenth of Mr. Harp's contribution.

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Accordingly, the Office of General Counsel recommends that the Commission find no probable cause to believe that Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A).

III. General Counsel's Recommendations

The Office of General Counsel recommends that the Commission:

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

11 Feb 1986
Date

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 1986

Wendell Harp
74 Dwight Street
New Haven, Connecticut 06511

RE: MUR 1845
Wendell Harp

Dear Mr. Harp:

Based on a complaint filed with the Commission on November 5, 1984, the Commission determined on March 12, 1985, there was reason to believe that you had violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 441a(a)(1)(A) has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 1986

Martin R. Anastasio, Jr., treasurer
DeNardis for Congress
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

RE: MUR 1845
DeNardis for Congress
Committee and Martin R.
Anastasio, Jr., as treasurer

Dear Mr. Anastasio:

Based on a complaint filed with the Commission on November 5, 1984, the Commission determined on March 12, 1985, there was reason to believe that the DeNardis for Congress Committee and you, as treasurer, had violated 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 434(b) has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

86040593344

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 1986

Juan Scott, treasurer
Urban Coalition
130 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition and
Juan Scott, treasurer

Dear Mr. Scott:

Based on a complaint filed with the Commission on November 5, 1984, the Commission determined on March 12, 1985, there was reason to believe that the Urban Coalition and you, as treasurer, had violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 441a(f) has occurred. The Commission may or may not approve the General Counsel's Recommendation. This recommendation concerns only the alleged violation of 2 U.S.C. § 441a(f) by your committee.

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 if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 1986

Wendell Harp
74 Dwight Street
New Haven, Connecticut 06511

RE: MUR 1845
Wendell Harp

Dear Mr. Harp:

Based on a complaint filed with the Commission on November 5, 1984, the Commission determined on March 12, 1985, there was reason to believe that you had violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 441a(a)(1)(A) has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1845
Wendell Harp	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

This matter was initiated by a complaint filed with the Federal Election Commission ("Commission") by Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee against Wendell Harp, alleging that Mr. Harp made contributions to the Urban Coalition ("Coalition") and the DeNardis for Congress Committee ("DeNardis Committee") which, when aggregated, exceeded the contribution limitations of 2 U.S.C. § 441a(a)(1)(A). On March 12, 1985, the Commission determined there was reason to believe that Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A). A response was received from Mr. Harp on April 30, 1985.

II. Legal Analysis

Wendell Harp made a $1000 contribution to the DeNardis Committee for the 1984 general election. Mr. Harp also made a $1000 contribution to the Urban Coalition for the 1984 general election. The Urban Coalition in turn made an independent expenditure of $100 on behalf of Larry DeNardis.

Pursuant to 11 C.F.R. § 110.1(h), an individual may contribute to a candidate or his authorized committee with respect to a particular election and also contribute to a political committee supporting the same candidate in the same election as long as:

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1. the committee is not the candidate's principal campaign committee, an authorized committee or a single candidate committee;

2. the contributor does not give with the knowledge that a substantial portion of the contribution will be expended on that same candidate for the same election; and

3. the contributor does not retain control over the funds.

The investigation of this matter revealed that the Urban Coalition was a multicandidate committee. Although Mr. Harp was a member of the "DeNardis finance committee," he claims not to have known from the Coalition's solicitation letter that a portion of his contribution would be spent on the DeNardis campaign. 1/ He also states that he had no control over the Coalition's expenditures.

Although the Coalition's solicitation letter to Mr. Harp advocates support for DeNardis' candidacy, no evidence has been produced suggesting that Wendell Harp intended to make a contribution to DeNardis through the Coalition. Mr. Harp intended to make a contribution to a committee which, to his belief, was a multicandidate committee. The fact that the Coalition used a portion of his contribution for an expenditure on behalf of DeNardis is not sufficient to establish a contribution from Harp to DeNardis.

1/ Only $100 was spent by the Coalition to support the DeNardis campaign, an amount equal to one-tenth of Mr. Harp's contribution.

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Accordingly, the Office of General Counsel recommends that the Commission find no probable cause to believe that Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A).

III. General Counsel's Recommendations

The Office of General Counsel recommends that the Commission:

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

11 Feb 1996
Date

Charles N. Steele
General Counsel

86040594351

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 1986

Martin R. Anastasio, Jr., treasurer
DeNardis for Congress
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

RE: MUR 1845
DeNardis for Congress
Committee and Martin R.
Anastasio, Jr., as treasurer

Dear Mr. Anastasio:

Based on a complaint filed with the Commission on November 5, 1984, the Commission determined on March 12, 1985, there was reason to believe that the DeNardis for Congress Committee and you, as treasurer, had violated 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 434(b) has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
DeNardis for Congress	)	MUR 1845
Martin R. Anastasio, Jr.,	)	
treasurer	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

This matter was initiated by a complaint filed with the Federal Election Commission ("Commission") by Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee against DeNardis for Congress ("DeNardis Committee") alleging that the latter failed to report the receipt of an in-kind contribution from the Urban Coalition. On March 12, 1985, the Commission determined there was reason to believe that the DeNardis Committee and Martin R. Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b).

The DeNardis Committee responded to the Commission's determination by letter dated April 10, 1985.

II. Legal Analysis

The subject of the purported in-kind contribution from the Urban Coalition to the DeNardis Committee, as alleged in the complaint, were campaign posters displayed throughout the third congressional district of Connecticut, advocating the election of Larry DeNardis to the United States House of Representatives. The Urban Coalition originally reported the posters as an in-kind contribution to the DeNardis Committee, whereas the latter failed to report any in-kind contributions received from the Urban Coalition.

Pursuant to 2 U.S.C. § 434(b), all contributions, including in-kind contributions, must be disclosed by the recipient. However, the DeNardis Committee informed the Commission that all contributions received by it were disclosed to the Commission and that no in-kind contributions were received from the Urban Coalition. The DeNardis Committee claims that any expenditures made by the Urban Coalition were independent expenditures rather than an in-kind contribution.

The Committee's claim is corroborated by the correspondence received from the Urban Coalition. The Coalition amended its report on file with the Commission to show a $100 independent expenditure on behalf of Larry DeNardis. The Coalition also stated that the campaign posters were produced and distributed solely by them, without communication or consultation with the DeNardis Committee. Accordingly, the Office of General Counsel recommends that the Commission find no probable cause to believe that the DeNardis Committee and Martin R. Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b).

III. General Counsel's Recommendations

The Office of General Counsel recommends that the Commission:

1. Find no probable cause to believe that the DeNardis for Congress Committee and Martin R. Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b).

12 Feb. 1986
Date

Charles N. Steele
General Counsel

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 12, 1986

Juan Scott, treasurer
Urban Coalition
130 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition and
Juan Scott, treasurer

Dear Mr. Scott:

Based on a complaint filed with the Commission on November 5, 1984, the Commission determined on March 12, 1985, there was reason to believe that the Urban Coalition and you, as treasurer, had violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 441a(f) has occurred. The Commission may or may not approve the General Counsel's Recommendation. This recommendation concerns only the alleged violation of 2 U.S.C. § 441a(f) by your committee.

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 if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8604057943357

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Urban Coalition	)	MUR 1845
Juan Scott, treasurer	)	

GENERAL COUNSEL'S BRIEF

I. Statement of the Case

This matter was initiated by a complaint filed with the Federal Election Commission ("Commission") by Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee against the Urban Coalition ("Coalition") and Juan Scott, as treasurer, alleging that the Coalition solicited, accepted and disbursed funds in excess of the contribution limitations of 2 U.S.C. § 441a. On March 12, 1985, the Commission determined there was reason to believe that the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

The Coalition failed to respond to the Commission's reason to believe determinations. On May 21, 1985, the Commission authorized a subpoena to produce documents and an order to submit written answers for the Coalition. The Coalition's response was received on July 23, 1985, and additional information was received from the Coalition on October 18, 1985.

II. Legal Analysis

The Commission's determination was based on contributions by Wendell Harp of $1000 to the Coalition and $1000 to the DeNardis for Congress Committee ("DeNardis Committee") and an allegation in the complaint that the Urban Coalition was a single candidate committee. Pursuant to 2 U.S.C. § 441a(a)(1)(A), no person may contribute in excess of $1000 to a candidate and his authorized

political committee with respect to any election to federal office. However, an individual may contribute to a candidate (or his authorized political committee) with respect to a particular election and also contribute to a political committee supporting the same candidate in the same election as long as, inter alia, the committee is not a single candidate committee or an authorized committee.

The Urban Coalition is a registered multi-candidate committee. Although the Urban Coalition was only able to raise a limited amount of funds and thus made an expenditure only for Larry DeNardis, the coalition denies that its sole or principal purpose was to assist the DeNardis campaign. Mr. Scott, in a sworn response, states that he was not authorized to raise or expend money for DeNardis. Mr. Harp, the contributor, states that he did not believe that the Urban Coalition existed solely to support DeNardis, nor did he have any reason to suspect so from the solicitation letter he received.

Although the Coalition's solicitation letter to Mr. Harp advocates support for DeNardis' candidacy, no evidence has been produced suggesting that Wendell Harp intended to make a contribution to DeNardis through the Coalition. Mr. Harp intended to make a contribution to a multicandidate committee. Since the Coalition is not an authorized committee of candidate DeNardis, nor a single candidate committee, it was permitted to solicit and accept the $1000 contribution from Wendell Harp. Accordingly, the Office of General Counsel recommends that the Commission find no probable cause to believe that the Urban

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Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

III. General Counsel's Recommendations

The Office of General Counsel recommends that the Commission:

1. Find no probable cause to believe that the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

12 Feb. 1986
Date

Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Wendell Harp
74 Dwight Street
New Haven, Connecticut 06511

RE: MUR 1845
Wendell Harp

Dear Mr. Harp:

Based on a complaint filed with the Commission on November 5, 1984, the Commission determined on March 12, 1985, there was reason to believe that you had violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 441a(a)(1)(A) has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Martin R. Anastasio, Jr., treasurer
DeNardis for Congress
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

RE: MUR 1845
DeNardis for Congress
Committee and Martin R.
Anastasio, Jr., as treasurer

Dear Mr. Anastasio:

Based on a complaint filed with the Commission on November 5, 1984, the Commission determined on March 12, 1985, there was reason to believe that the DeNardis for Congress Committee and you, as treasurer, had violated 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 434(b) has occurred. The Commission may or may not approve the General Counsel's Recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Juan Scott, treasurer
Urban Coalition
130 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition and
Juan Scott, treasurer

Dear Mr. Scott:

Based on a complaint filed with the Commission on November 5, 1984, the Commission determined on March 12, 1985, there was reason to believe that the Urban Coalition and you, as treasurer, had violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act") and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation of 2 U.S.C. § 441a(f) has occurred. The Commission may or may not approve the General Counsel's Recommendation. This recommendation concerns only the alleged violation of 2 U.S.C. § 441a(f) by your committee.

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 if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

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

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

8604059436

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1845
Urban Coalition	)	
Juan Scott, treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of January 22, 1986, do hereby certify that the Commission decided by a vote of 5-0 to take the following actions in MUR 1845:

1. Enter into conciliation with the Urban Coalition and Juan Scott, as treasurer, prior to a finding of probable cause to believe.

2. Approve the proposed conciliation agreement attached to the General Counsel's report dated January 14, 1986, subject to reduction of the civil penalty to Two Hundred Dollars ($200.00).

3. Approve the letter attached to the General Counsel's report dated January 14, 1986.

Commissioners Aikens, Elliott, Harris, Josefiak, and McGarry voted affirmatively for the decision; Commissioner McDonald was not present.

Attest:

1-22-86
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY
SENSITIVE
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In the Matter of	)	
	)	
Urban Coalition	)	MUR 1845
Juan Scott, treasurer	)	

GENERAL COUNSEL'S REPORT

I. Background

On March 12, 1985, the Federal Election Commission ("Commission") determined there was reason to believe that the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 434(a)(4)(A) by failing to file required reports, and 2 U.S.C. § 441d by failing to affix a proper disclaimer on campaign posters.

On May 23, 1985, the Commission issued a subpoena and order to assist in the investigation of this matter. A response was received from Urban Coalition on July 23, 1985.

II. Legal Analysis

1) 2 U.S.C. § 434(a)

The most recent filing by the Urban Coalition was its 1984 October Quarterly report, filed October 26, 1984, and covering the period September 14, 1984 through October 11, 1984. Pursuant to 2 U.S.C. § 434(a), the Coalition's October Quarterly report was due on October 15, 1984. Thus, the Coalition's filing was 11 days late.

The Coalition failed to file a 12 Day Pre-general Election report, a 30 Day Post-general Election report and a 1984 Year-end report. The 12 Day Pre-general was due on October 25, 1984; the 30 Day Post-General was due on December 6, 1984; and the Year-end

was due on January 31, 1985. See 2 U.S.C. § 434(a).

2) 2 U.S.C. § 441d

The response of Juan Scott, treasurer of the Urban Coalition, indicates that the Coalition made a $100 independent expenditure for campaign posters that supported Larry DeNardis for Congress. The posters were displayed at the Urban Coalition's headquarters and on vacant buildings in New Haven, Connecticut, which is part of the state's 3rd Congressional district. The posters did not carry any disclaimer stating that they were paid for by the Coalition, nor did the posters state that the Coalition was not an authorized committee of the DeNardis for Congress Committee. Respondents termed their failure to include a disclaimer complying with 2 U.S.C. § 441d, as "inadvertent."

On October 23, 1985, Juan Scott requested conciliation of this matter prior to a determination of probable cause to believe that violations occurred. The Office of General Counsel recommends that the Commission enter into pre-probable cause conciliation with the Urban Coalition and Juan Scott, as treasurer, for violations of 2 U.S.C. § 434(a) and 2 U.S.C. § 441d.

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IV. Recommendations

The Office of General Counsel recommends that the Commission:

1. Enter into conciliation with the Urban Coalition and Juan Scott, as treasurer, prior to a finding of probable cause to believe.

2. Approve the attached proposed conciliation agreement.

3. Approve the attached letter.

Charles N. Steele
General Counsel

January 14, 1986
Date

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments
1. Request for conciliation
2. Proposed conciliation agreement
3. Proposed letter

8604059437 1

ATTACHMENT 1 ①

RECEIVED BY THE FEC
GCA#8813
85 OCT 28 A9:41

THE URBAN COALITION

Box 3086 - Westville Station
New Haven, Connecticut 06515

Engle

October 23, 1985

Craig Engle
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1845
Urban Coalition
Juan Scott, as Treasurer

Dear Mr. Engle,

Pursuant to our telephone conversation on September 23, 1985, I would like to provide the following:

1) After a review of the code of Federal Regulation, 11, 1984 (CFR,11,1984) specifically the section pertaining to Independent Expenditures part 109.7 definition 2 U.S.C. 431 (17). It is blatantly clear that on the Urban Coalition report, that I erred in the appropriate assignment of the expenditures. The report (Fee Form 3X) reflects an expenditure of $700.11 on page 2 section 11. Disbursement on line 21. Contribution to Federal Candidates and other Political Committees, additionally schedule B of the same report provides specific delineation of those expenditures. The correct designation on page 2 section 11, the appropriate line item is 22, "Independent Expenditure" and the appropriate itemized support documentation is schedule E. I have included the corrected pages to replace those noted in the aformentioned statement. In terms of explanation, I simply failed to throughly read the guidelines and rendered a literal interpretation of the forms. Given my intentions and the nature of the decision process involved and review of U.S.C. 431 (17) and discussion with you, it is quite obvious the allocations are more properly designated in the correction [illegible]

Juan A. Scott

Juan A. Scott
Treasurer

85 OCT 28 A11:57

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(2)

85 OCT 28 A9:41

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA | ALIGN AREA

1. Name of Committee (In Full)

Urban Coalition

Address (Number and Street)

P.O. Box 3086

City, State and ZIP Code

New Haven, CT 06515

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00190173

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☒ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)

election on _____ in the State of _____

☐ Thirtieth day report following the General Election

on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☒ YES ☐ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 9/14/84 through 10/11/84		
6. (a) Cash on hand January 1, 19 84		$ - 0 -
(b) Cash on Hand at Beginning of Reporting Period	$ - 0 -	
(c) Total Receipts (from Line 18)	$ 2,075.00	$ 2,075.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 2,075.00	$ 2,075.00
7. Total Disbursements (from Line 28)	$ 1,916.07	$ 1,916.07
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 158.93	$ 158.93
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ - 0 -	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ - 0 -	

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

Juan A. Scott, Treasurer
Type or Print Name of Treasurer

Juan A. Scott
SIGNATURE OF TREASURER

10/23/85
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

(3)

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

Name of Committee (In Full): Urban Coalition

Report Covering the Period: From: 9/14/84 To: 10/11/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	2,075.00		11(a)
(Memo Entry Unitemized $)			
(b) Political Party Committees	00		11(b)
(c) Other Political Committees	00		11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	2,075.00		11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	00		12
13. ALL LOANS RECEIVED	00		13
14. LOAN REPAYMENTS RECEIVED	00		14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	00		15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	00		16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	00		17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	2,075.00		18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1,215.96		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	00		20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	00		21
22. INDEPENDENT EXPENDITURES (use Schedule E)	700.11		22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,916.07		28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	2,075.00		29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	00		30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	2,075.00		31
32. TOTAL OPERATING EXPENDITURES from Line 19	1,215.96		32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	00		33

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(4)

Replacement for Sched · B, 10/23/85

SCHEDULE E

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (in Full): Urban Coalition

I.D. No: C00190173

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Gerald Thornton 600 Winthrop Ave. New Haven, CT 06511	Posters	9/14/84	100.00	Lawrence DeNardis Connecticut 3rd District ☒ Support ☐ Oppose
Tyco 262 Elm Street New Haven, CT	Fundraising letter	9/18/84	30.11	Same as Above ☒ Support ☐ Oppose
MSA Comp 22 Broadway North Haven, CT 06473	Printing of Tabloid	9/18/84	200.00	Same as Above ☒ Support ☐ Oppose
MSA Comp 22 Broadway North Haven, CT 06473	Printing of Tabloid	10/5/84	220.00	Same as Above ☒ Support ☐ Oppose
Peter Adamowich, Jr. 113 Broad Street New Britain, CT	Photographic Cost of Tabloid	10/11/84	85.00	Same as Above ☒ Support ☐ Oppose
Andrea M. Scott 130 Roger White Drive New Haven, CT 06511	Reimbursement for postage expense	10/11/84	65.00	Same as Above ☒ Support ☐ Oppose

(a) **SUBTOTAL** of Itemized Independent Expenditures $ 700.11

(b) **SUBTOTAL** of Unitemized Independent Expenditures $ _____

(c) **TOTAL** Independent Expenditures $ 700.11

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Andrea M. Scott — Signature

10-23-85 — Date

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires _____

NOTARY PUBLIC

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• SENSITIVE •

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
The Urban Coalition	)	MUR 1845
Juan Scott, as treasurer	)	

85 SEP 20 P4:44

COMPREHENSIVE INVESTIGATIVE REPORT

BACKGROUND

On May 23, 1985, the Commission issued a subpoena to Juan Scott, as tresurer of The Urban Coalition, to provide information and produce documents to assist the General Counsel's Office in its investigation of MUR 1845. Mr. Scott received the subpoena on May 30, 1985, and was given 10 days to respond. As of July 3, 1985, Mr. Scott had not submitted his reply or requested an extension of time in which to file a response. Because of this delay, the Commission, on July 16, 1985, authorized the General Counsel's Office to enforce the subpoena against the Urban League, and Juan Scott, as treasurer.

On July 23, 1985, the General Counsel's Office received a sworn statement from Mr. Scott in response to the subpoena. Mr Scott's statement was dated July 18, 1985 and answers the questions put forth in the subpoena. Mr. Scott's statement was also accompanied by the documents that were requsted for production.

ANALYSIS

Mr. Scott has substantially complied with the May 23, 1985 subpoena. Although the delay in his responding compelled the Commission, at the request of the General Counsel's Office, to authorize civil enforcement of the subpoena, such proceedings are

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no longer necessary. The answers provided in Mr. Scott's statement have given the General Counsel's Office an adequate foundation to continue its investigation into this matter, and have satisfied the basic requirements of the subpoena as he understood them. While further investigation of this matter may be necessary, it would best be accomplished by more informal questioning.

Charles N. Steele
General Counsel

Sept. 18, 1985
Date

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachment
Subpoena responses of Mr. Juan Scott

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THE FEC
GCC# 8092
85 JUL 23 P 1:

THE URBAN COALITION
Box 3086—Westville Station—New Haven, Connecticut 06515

JUL 23 P 3: 29

July 18, 1985

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1845
Urban Coalition
Juan Scott, as treasurer

Dear Mr. Gross:

This letter is provided to respond to Supoena To Produce Documents Order To Submit Written Answers before the Federal Elections Commission in the matter of Urban Coalition Juan Scott, Treasurer, MUR 1845.

1. I have attached copy of poster, tabloid, and photograph produce by the Urban Coalition marked Exhibit A.

2. The Urban Coalition was founded by myself solely after energentic consultation with several parties relative to the concept of a Minority Business P.A.C. I consulted an Attorney David Reif to commence the initial steps necessary to register a Political Action Committee with the United States Federal Election Committee. In addition the Urban Coalition hired a temporary staff to assist in the administrative operation of the PAC and to develop the concept for its growth and stability.

3. I. For the letter,

   a. I created (Juan A. Scott)
   b. It was distributed throughout Connecticut mainly, some to indivuals in other states with a strong concentration in the New Haven County area.
   c. Distribution was accommodated by mailing, by door to door deliverery by volunteers, staff members of the Urban Coalition, myself personally, placed in parking lots, in public places.

   II. For the Tabloid,

   a. The concept of the tabloid was developed by myself and my wife Andrea M. Scott designed the graphic lay-out and format.
   b. It was distributed principally in the cities' black community concentrated areas. And, roughly the same degree as the letter ref. I.b., with the exception of the mailing system.
   c. The distribution network was essentially the same as indicated in I.c.

   III. Poster,

   a. The concept developed by myself, the graphic and production facilitated by Mr. Gerald Thornton.
   b. It was distributed or more appropriately phrase displayed at our

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office, on vacant buildings and deterioted infrasture, ie. bus-stops. It should be noted that this practice was utilized by candidates endorsed by the local democratic party on all levels, including Third Congressional Candidate Bruse Morrisson whose poster lack the proper documentation to same degree the Urban Coalition posters are accused of, in fact I have included a poster from the Morrisson's Campaign marked Exhibit B to illustrate this position and publically, and respectfully request equality of treatment.

The Photographs were used exclusively as an inclusion item in the production of the tabloid, therefore, its distribution is solely limited in the aforemention format.

4. The term "associated with Urban Coalition" is vague therefore I will respond in this fashion, and hopefully address the substance of the inquiry.

   a. I, Juan A. Scott, am the creator, the originator, the initiator, the founder of the Urban Coalition.

      I have never been authorized to raise or expend funds on behalf of DeNardis candidacy. In this sense "candidacy" means the official campaign organization established for the election of Lawrence DeNardis.

   b. Carol Brooks, contracted to attend primarily to the administrative aspect of the Urban Coalition ie. designing a file system, ordering office supplies handling scheduling and light record-keeping. To the best of my knowledge she was not authorized to collect or expend funds on behalf of DeNardis candidacy.

   c. Joshua Moore, contracted to market the concept of the Urban Coalition and to provide consultive service on the most effective means of conveying our message to city's black community. To the best of my knowledge he was not authorized to raise or expend funds on behalf of DeNardis candidacy.

      Wendell Harp - significant contributor to the Urban Coalition, in my opinion does not constitute association in the sense I interpreted, given his limited involvement was limited to this aspect. I was aware that he was a member of DeNardis Finance Committee, what specific authority that provided him relative to expending or raising funds on behalf of the DeNardis candidacy is not totally understood by myself.

5. All of the indivuals identified in 4. involvement familiarity is to the extent stated in four. I attended one meeting of the DeNardis candidacy Issue Committee and received periodic correspondence relative to same.

6. Basic response given in four and five represent the extent of my familiarily as it relates to this inquiry.

7. To be quite candid, I did not have a great deal of confidence in the DeNardis Candidacy ability to be effective, in reaching the Black voter. Therefore, the letter is a product of my vision exclusively. Unfortunately, in my zealousness, I misstated the legally excepted limited of my expenditure, a fact that was painfully noted by the local chairman of the democratic party and local, daily and weekly newspapers with a comparably wide circulation.

8. The posters were based on my years of experience in campaigning on behalf of

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state and local candidates. It represented my views and concepts as an effective format to provide high visibility to the DeNardis candidacy in New Haven inner city areas.

9. I have been active in state and local affairs for well over sixteen years, the tabloid represented former Congressman DeNardis historically documented record. A record given my past involvement that does not require official representatives of the DeNardis candidacy to provide information on his plan, projects or needs(relative to needs I express my view on this issue in the answer to question 7.) to develop the tabloid.

10. Schedule B appears to be self-explanatory, please provide clarification.

Sincerely,

Juan A. Scott

Juan A. Scott, Treasurer

Subscribed and sworn to before me this 18th day of July, 1985

City of New Haven, county of New Haven.

Mary A. Hayes
Justice of the Peace

Expiration date - Dec. 31, 1988

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RECEIVED AT THE FEC
S.C.C.# 8813
85 OCT 28 A9:41

THE URBAN COALITION

Box 3086 - Westville Station
New Haven, Connecticut 06515

85 OCT 28 A11:57

October 23, 1985

Craig Engle
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1845
Urban Coalition
Juan Scott, as Treasurer

Dear Mr. Engle,

Pursuant to our telephone conversation on September 23, 1985, I would like to provide the following:

1) After a review of the code of Federal Regulation, 11, 1984 (CFR,11,1984) specifically the section pertaining to Independent Expenditures part 109.7 definition 2 U.S.C. 431 (17). It is blatantly clear that on the Urban Coalition report, that I erred in the appropriate assignment of the expenditures. The report (Fee Form 3X) reflects an expenditure of $700.11 on page 2 section 11. Disbursement on line 21. Contribution to Federal Candidates and other Political Committees, additionally schedule B of the same report provides specific delineation of those expenditures. The correct designation on page 2 section 11, the appropriate line item is 22, "Independent Expenditure" and the appropriate itemized support documentation is schedule E. I have included the corrected pages to replace those noted in the aformentioned statement. In terms of explanation, I simply failed to throughly read the guidelines and rendered a literal interpretation of the forms. Given my intentions and the nature of the decision process involved and review of U.S.C. 431 (17) and discussion with you, it is quite obvious the allocations are more properly designated in the correction noted.

Juan A. Scott

Juan A. Scott
Treasurer

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85 OCT 28 A9:41

REPORT OF RECEIPTS AND DISBURSEMENTS

For a Political Committee Other Than an Authorized Committee

(Summary Page)

ALIGN AREA

ALIGN AREA

1. Name of Committee (In Full)

Urban Coalition

Address (Number and Street)

P.O. Box 3086

City, State and ZIP Code

New Haven, CT 06515

☐ Check here if address is different than previously reported.

2. FEC Identification Number

C00190173

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (Date)

4. TYPE OF REPORT (Check appropriate boxes)

(a) ☐ April 15 Quarterly Report ☒ October 15 Quarterly Report

☐ July 15 Quarterly Report ☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-Election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____

☐ Thirtieth day report following the General Election on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☒ YES ☐ NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period 9/14/84 through 10/11/84		
6. (a) Cash on hand January 1, 19 84		$ - 0 -
(b) Cash on Hand at Beginning of Reporting Period	$ - 0 -	
(c) Total Receipts (from Line 18)	$ 2,075.00	$ 2,075.00
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	$ 2,075.00	$ 2,075.00
7. Total Disbursements (from Line 28)	$ 1,916.07	$ 1,916.07
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	$ 158.93	$ 158.93
9. Debts and Obligations Owed TO The Committee (Itemize all on Schedule C or Schedule D)	$ - 0 -	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)	$ - 0 -	

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

Juan A. Scott, Treasurer
Type or Print Name of Treasurer

Juan A. Scott
SIGNATURE OF TREASURER

10/23/85
Date

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

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

FEC FORM 3X (3/80)

8504057482

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

Name of Committee (in Full): Urban Coalition

Report Covering the Period: From: 9/14/84 To: 10/11/84

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees	2,075.00		11(a)
(Memo Entry Unitemized $)			
(b) Political Party Committees	00		11(b)
(c) Other Political Committees	00		11(c)
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11(a), 11(b) and 11(c))	2,075.00		11(d)
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	00		12
13. ALL LOANS RECEIVED	00		13
14. LOAN REPAYMENTS RECEIVED	00		14
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	00		15
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	00		16
17. OTHER RECEIPTS (Dividends, Interest, etc.)	00		17
18. TOTAL RECEIPTS (Add 11(d), 12, 13, 14, 15, 16 and 17)	2,075.00		18
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES	1,215.96		19
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	00		20
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	00		21
22. INDEPENDENT EXPENDITURES (use Schedule E)	700.11		22
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. § 441 a(d)) (Use Schedule F)			23
24. LOAN REPAYMENTS MADE			24
25. LOANS MADE			25
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			26(a)
(b) Political Party Committees			26(b)
(c) Other Political Committees			26(c)
(d) TOTAL CONTRIBUTION REFUNDS (Add 26(a), 26(b) and 26(c))			26(d)
27. OTHER DISBURSEMENTS			27
28. TOTAL DISBURSEMENTS (add lines 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	1,916.07		28
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11(d)	2,075.00		29
30. TOTAL CONTRIBUTION REFUNDS from Line 26(d)	00		30
31. NET CONTRIBUTIONS (other than loans) (Subtract Line 30 from Line 29)	2,075.00		31
32. TOTAL OPERATING EXPENDITURES from Line 19	1,215.96		32
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	00		33
34. NET OPERATING EXPENDITURES (Subtract Line 33 from Line 32)	1,215.96		34

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Replacement for Schedule B, 10/23/85

SCHEDULE B

ITEMIZED INDEPENDENT EXPENDITURES

(See Reverse Side for Instructions)

Name of Committee (in Full): Urban Coalition

I.D. No.: C00190173

Full Name, Mailing Address & ZIP Code of Each Payee	Purpose of Expenditure	Date (month, day, year)	Amount	Name of Federal Candidate supported or opposed by the expenditure & office sought
Gerald Thornton 600 Winthrop Ave. New Haven, CT 06511	Posters	9/14/84	100.00	Lawrence DeNardis Connecticut 3rd District ☒ Support ☐ Oppose
Tyco 262 Elm Street New Haven, CT	Fundraising letter	9/18/84	30.11	Same as Above ☒ Support ☐ Oppose
MSA Comp 22 Broadway North Haven, CT 06473	Printing of Tabloid	9/18/84	200.00	Same as Above ☒ Support ☐ Oppose
MSA Comp 22 Broadway North Haven, CT 06473	Printing of Tabloid	10/5/84	220.00	Same as Above ☒ Support ☐ Oppose
Peter Adamowich, Jr. 113 Broad Street New Britain, CT	Photographic Cost of Tabloid	10/11/84	85.00	Same as Above ☒ Support ☐ Oppose
Andrea M. Scott 130 Roger White Drive New Haven, CT 06511	Reimbursement for postage expense	10/11/84	65.00	Same as Above ☒ Support ☐ Oppose

(a) SUBTOTAL of Itemized Independent Expenditures $ 700.11

(b) SUBTOTAL of Unitemized Independent Expenditures $ _____

(c) TOTAL Independent Expenditures $ 700.11

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, concert with, or at the request or suggestion of any candidate or any authorized committee or agent of such candidate or authorized committee. Furthermore, these expenditures did not involve the financing of dissemination, distribution, or republication in whole or in part of any campaign materials prepared by the candidate, his campaign committee, or their agent.

Signature: [signature]

Date: 10-23-85

Subscribed and sworn to before me this _____ day of _____, 19____

My Commission expires: _____

NOTARY PUBLIC

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1845
Urban Coalition	)	
Juan Scott, treasurer	)	

CERTIFICATION

I, Mary W. Dove, recording secretary for the Federal Election Commission meeting on July 16, 1985, do hereby certify that the Commission decided by a vote of 4-0 to take the following action in MUR 1845:

> Authorize the Office of General Counsel to take civil action against the Urban Coalition and Juan Scott, as treasurer, to enforce a subpoena to produce documents and order to submit written answers.

Commissioners Aikens, Elliott, McGarry, and Reiche voted affirmatively in this matter. Commissioners Harris and McDonald did not cast votes.

Attest:

7-17-85
Date

Mary W. Dove
Mary W. Dove
Recording Secretary

3604059435

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 30, 1985

Juan Scott
130 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition
Juan Scott, as treasurer

Dear Mr. Scott:

This letter confirms your telephone conversation with Craig Engle on September 23, 1985, in which you agreed to send this office a more detailed response to Question 10 of the May 21, 1985 Subpoena to Produce Documents and Submit Written Answers. In

We will look forward to hearing from you shortly, so that this matter may be resolved as soon as possible. If you have any questions, please contact Craig Engle, the attorney assigned to this case.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

85040594386

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Juan Scott
130 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition
Juan Scott, as treasurer

Dear Mr. Scott:

This letter confirms your telephone conversation with Craig Engle on September 23, 1985, in which you agreed to send this office a more detailed response to Question 10 of the May 21, 1985 Subpoena to Produce Documents and Submit Written Answers. In addition, as was discussed over the telephone, you will submit a request for conciliation on this matter.

We will look forward to hearing from you shortly, so that this matter may be resolved as soon as possible. If you have any questions, please contact Craig Engle, the attorney assigned to this case.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Juan Scott
130 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition
Juan Scott, as treasurer

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We will look forward to hearing from you shortly, so that this matter may be resolved as soon as possible. If you have any questions, please contact Craig Engle, the attorney assigned to this case.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

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RECEIVED AT THE FEC
GCC# 8092
85 JUL 23 P1:

THE URBAN COALITION
Box 3086—Westville Station—New Haven, Connecticut 06515

RECEIVED
GENERAL COUNSEL
85 JUL 23 P 3:29

July 18, 1985

Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1845
Urban Coalition
Juan Scott, as treasurer

Dear Mr. Gross:

This letter is provided to respond to Supoena To Produce Documents Order To Submit Written Answers before the Federal Elections Commission in the matter of Urban Coalition Juan Scott, Treasurer, MUR 1845.

1. I have attached copy of poster, tabloid, and photograph produce by the Urban Coalition marked Exhibit A.

2. The Urban Coalition was founded by myself solely after energentic consultation with several parties relative to the concept of a Minority Business P.A.C. I consulted an Attorney David Reif to commence the initial steps necessary to register a Political Action Committee with the United States Federal Election Committee. In addition the Urban Coalition hired a temporary staff to assist in the administrative operation of the PAC and to develop the concept for its growth and stability.

3. I. For the letter,

   a. I created (Juan A. Scott)
   b. It was distributed throughout Connecticut mainly, some to indivuals in other states with a strong concentration in the New Haven County area.
   c. Distribution was accommodated by mailing, by door to door deliverery by volunteers, staff members of the Urban Coalition, myself personally, placed in parking lots, in public places.

   II. For the Tabloid,

   a. The concept of the tabloid was developed by myself and my wife Andrea M. Scott designed the graphic lay-out and format.
   b. It was distributed principally in the cities' black community concentrated areas. And, roughly the same degree as the letter ref. I.b., with the exception of the mailing system.
   c. The distribution network was essentially the same as indicated in I.c.

   III. Poster,

   a. The concept developed by myself, the graphic and production facilitated by Mr. Gerald Thornton.
   b. It was distributed or more appropriately phrase displayed at our

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office, on vacant buildings and deterioted infrasture, ie. bus-stops. It should be noted that this practice was utilized by candidates endorsed by the local democratic party on all levels, including Third Congressional Candidate Bruse Morrisson whose poster lack the proper documentation to same degree the Urban Coalition posters are accused of, in fact I have included a poster from the Morrisson's Campaign marked Exhibit B to illustrate this position and publically, and respectfully request equality of treatment.

The Photographs were used exclusively as an inclusion item in the production of the tabloid, therefore, its distribution is solely limited in the aforemention format.

4. The term "associated with Urban Coalition" is vague therefore I will respond in this fashion, and hopefully address the substance of the inquiry.

   a. I, Juan A. Scott, am the creator, the originator, the initiator, the founder of the Urban Coalition.

      I have never been authorized to raise or expend funds on behalf of DeNardis candidacy. In this sense "candidacy" means the official campaign organization established for the election of Lawrence DeNardis.

   b. Carol Brooks, contracted to attend primarily to the administrative aspect of the Urban Coalition ie. designing a file system, ordering office supplies handling scheduling and light record-keeping. To the best of my knowledge she was not authorized to collect or expend funds on behalf of DeNardis candidacy.

   c. Joshua Moore, contracted to market the concept of the Urban Coalition and to provide consultive service on the most effective means of conveying our message to city's black community. To the best of my knowledge he was not authorized to raise or expend funds on behalf of DeNardis candidacy.

      Wendell Harp - significant contributor to the Urban Coalition, in my opinion does not constitute association in the sense I interpreted, given his limited involvement was limited to this aspect. I was aware that he was a member of DeNardis Finance Committee, what specific authority that provided him relative to expending or raising funds on behalf of the DeNardis candidacy is not totally understood by myself.

5. All of the indivuals identified in 4. involvement familiarity is to the extent stated in four. I attended one meeting of the DeNardis candidacy Issue Committee and received periodic correspondence relative to same.

6. Basic response given in four and five represent the extent of my familiarily as it relates to this inquiry.

7. To be quite candid, I did not have a great deal of confidence in the DeNardis Candidacy ability to be effective, in reaching the Black voter. Therefore, the letter is a product of my vision exclusively. Unfortunately, in my zealousness, I misstated the legally excepted limited of my expenditure, a fact that was painfully noted by the local chairman of the democratic party and local, daily and weekly newspapers with a comparably wide circulation.

8. The posters were based on my years of experience in campaigning on behalf of

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state and local candidates. It represented my views and concepts as an effective format to provide high visibility to the DeNardis candidacy in New Haven inner city areas.

9. I have been active in state and local affairs for well over sixteen years, the tabloid represented former Congressman DeNardis historically documented record. A record given my past involvement that does not require official representatives of the DeNardis candidacy to provide information on his plan, projects or needs(relative to needs I express my view on this issue in the answer to question 7.) to develop the tabloid.

10. Schedule B appears to be self-explanatory, please provide clarification.

Sincerely,

Juan A. Scott

Juan A. Scott, Treasurer

Subscribed and sworn to before me this 18th day of July, 1985

City of New Haven, county of New Haven.

Mary P. Hayes
Justice of the Peace

Expiration date - Dec. 31, 1988

8604075439 1

SENSITIVE

MUR 1845

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

'85 JUL 15 P3:22

In the Matter of	)	
	)	
Urban Coalition	)	MUR 1845
Juan Scott, treasurer	)	

EXECUTIVE SESSION

JUL 16 1985

GENERAL COUNSEL'S REPORT

BACKGROUND

On May 21, 1985, the Commission issued a subpoena to produce documents and order to submit written answers to Juan Scott, treasurer of the Urban Coalition. The information sought through the subpoena/order was necessary to facilitate the Commission's investigation of this matter. Mr. Scott received the subpoena/order on May 30, 1985 and was given ten days in which to submit his reply. As of this date, Mr. Scott has neither submitted his reply nor requested an extension of time in which to file a response.

RECOMMENDATION

It is recommended that the Commission authorize the Office of General Counsel to take civil action against the Urban Coalition and Juan Scott, as treasurer, to enforce a subpoena to produce documents and order to submit written answers.

7/3/85
Date

Charles N. Steele
Charles N. Steele
General Counsel

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Juan Scott
130 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition
Juan Scott, as treasurer

Dear Mr. Scott:

On April 2, 1985, you were notified that the Commission found reason to believe the Urban Coalition and you, as treasurer, violated 2 U.S.C. §§ 434(a), 441d and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires you to provide information and answers which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions, please direct them to Judy Thedford, the staff member handling this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order
Questions

5-22-85

85040574395

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Juan Scott
130 Roger White Drive
New Haven, Connecticut 06511

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Urban Coalition
Juan Scott, as treasurer

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order
Questions

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 28, 1985

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Juan Scott
130 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition
Juan Scott, as treasurer

Dear Mr. Scott:

On April 2, 1985, you were notified that the Commission found reason to believe the Urban Coalition and you, as treasurer, violated 2 U.S.C. §§ 434(a), 441d and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

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Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order
Questions

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

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Urban Coalition	)	MUR 1845
Juan Scott, Treasurer	)	

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on May 27, 1985.

John Warren McGarry
John Warren McGarry
Chairman

ATTEST:

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

Attachment
Interrogatories

8 5 0 4 0 5 9 4 3 9 6

INTERROGATORIES TO JUAN SCOTT, TREASURER
OF THE URBAN COALITION

The 1984 October Quarterly Report filed by the Urban Coalition reported its activity on behalf of Lawrence DeNardis as in-kind contributions (see attached page of the report). Please submit the following documents and answer the following questions concerning the in-kind contributions listed on that page.

1. Submit a copy of the poster, letter, tabloid, and photograph produced by the Urban Coalition.

2. List the members or individuals (names and addresses, please) associated with the Urban Coalition. Where appropriate, supply titles.

3. For the letter, tabloid, poster and photograph, describe:

   a) who created it;

   b) where it was distributed; and

   c) who distributed it.

4. Were any of the individuals associated with the Urban Coalition, either currently or formerly, authorized to raise or expend funds on behalf of DeNardis' candidacy?

5. Were any of the individuals associated with the Urban Coalition, either currently or formerly, an officer of any DeNardis committee? If so please explain.

6. Were any of the individuals associated with the Urban Coalition, either currently or formerly, receiving any form of compensation or reimbursement from DeNardis, his committees, or agents? If so, please describe.

7. Was the letter by the Urban Coalition based on information about DeNardis' plans, projects, or needs which were provided to you or someone else associated with the Urban Coalition by DeNardis or his agents with a view towards having an expenditure made? If so, please describe.

8. Was the poster by the Urban Coalition based on information about DeNardis' plans, projects or needs which was provided to you or someone else associated with the Urban Coalition by DeNardis or his agents with a view towards having an expenditure made? If so, please describe.

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9. Was the tabloid by the Urban Coalition based on information about DeNardis' plans, projects, or needs which was provided to you or someone else associated with the Urban Coalition by DeNardis or his agents with a view towards having an expenditure made? If so, please describe.

10. The attached sheet reflects in-kind contributions totalling $700.11 to the candidacy of Lawrence DeNardis. Please explain your reason for reporting these contributions as such.

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SCHEDULE B

ITEMIZED DISBURSEMENTS
(CONTRIBUTION TO FEDERAL CANDIDATES)

[illegible] Reports and Statements may not be sold or used by any person for the purpose of soliciting [illegible]

Urban Coalition C00190171

Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
A. Gerald Thornton 600 Winthrop Ave. New Haven, CT 06511	Posters (In-Kind Contri DeNardis Camp. Disbursement for Primary X General Other (specify)	9-14-84	100.00
B. Fuco 262 Elm Street New Haven, CT	Fundraising letter for DeNardis for Congress In Kind Contri. Disbursement for Primary X General Other (specify)	9-18-84.	30.11
C. MSA Comp. 22 Broadway North Haven, CT 06473	Printing of Tabloid-In-Kind Contri, DeNardis for Congress Disbursement for Primary X General Other (specify)	9/18/84	200.00
D. MSA Comp. 22 Broadway North Haven, CT 06473	Balance Printing Tabloid-In-Kind DeNardis for Congress Disbursement for Primary General Other (specify)	10/5/84	220.00
E. Peter Adamowich Jr. 113 Broad Street New Britain, CT	In-Kind Photographer DeNardis Disbursement for Primary General Other (specify)	10/11/84	85.00
F. Andrea M. Scott 130 Roger White Pe New Haven, CT 06511	Re-Imbursement 50-Postage In kind DeNardis 15 Envelops Camp. Disbursement for Primary General Other (specify)		65.00
G.	Purpose of Disbursement Disbursement for Primary General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H.	Purpose of Disbursement Disbursement for Primary General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I.	Purpose of Disbursement Disbursement for Primary General Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (last page only)			700.11
TOTAL This Period (last page only, enter same number on line 23)			

8604059439

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 1845
Urban Coalition	)	
Juan Scott, treasurer	)	
DeNardis for Congress Committee	)	
Martin R. Anastasio, Jr.,	)	
treasurer	)	
Wendell Harp	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 21, 1985, the Commission decided by a vote of 6-0 to take the following actions in MUR 1845:

1. Approve and send the subpoena to produce documents and order to submit written answers to Juan Scott, treasurer of the Urban Coalition, attached to the General Counsel's Report signed May 15, 1985.

2. Approve and send the letter attached to the General Counsel's Report signed May 15, 1985.

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

Attest:

5-21-85
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 5-16-85, 11:10
Circulated on 48 hour tally basis: 5-16-85, 4:00

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Urban Coalition	)	
Juan Scott, Treasurer	)	
DeNardis for Congress Committee	)	MUR 1845
Martin R. Anastasio, Jr.,	)	
Treasurer	)	
Wendell Harp	)	

GENERAL COUNSEL'S REPORT

I. BACKGROUND

On March 12, 1985, the Commission found reason to believe that the Urban Coalition; Juan Scott, as treasurer; DeNardis for Congress Committee; Martin R. Anastasio, Jr., as treasurer; and Wendell Harp violated certain sections of the Act and initiated an investigation. The respondents were notified of the Commission's action by letter dated April 2, 1985.

On April 10, 1985, the DeNardis for Congress Committee ("the DeNardis Committee") forwarded a response to the reason to believe notice to the Commission. The response reiterates its earlier response that the Urban Coalition ("the Coalition") was an independent committee not associated with the DeNardis Committee and that all contributions it received were duly reported to the Commission (see Attachment I).

On April 15, 1985, Wendell Harp phoned in reply to his receipt of the reason to believe notice. Mr. Harp agreed to submit answers to the questions posed to him and inquired into Commission procedures. Mr. Harp's response was received on April 30, 1985. Mr. Harp's responses indicate:

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-that he was solicited personally by Juan Scott for the contribution in mid-August of 1984;

-that at the time he was solicited Mr. Scott advised him that he was intending to form a state-wide pac that would focus on raising monies for Congressional candidates sensitive to Hispanic and Black small business concerns;

-that the solicitation was not referenced towards individual candidates but focused upon minority business concerns through political involvement

-that the solicitation did not allow for earmarking nor was it intended to be;

-that he was not involved in the formation of the pac;

-and that Mr. Harp participated in the DeNardis candidacy as a member of the finance committee for 1984.

Mr. Harp also submitted additional information concerning his contribution to the Urban Coalition (see Attachment II).

The Coalition has not responded to the reason to believe notice.

II. ANALYSIS

The evidence before the Commission concerning the violations by the DeNardis Committee and the Coalition is unchanged from that available to it before the reason to believe determination. Further information is needed from the Coalition concerning the activity reported as in-kind contributions. The DeNardis

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Committee has consistently denied that the Coalition's activity constitutes in-kind contributions. Further information from the Coalition will enable us to have the DeNardis Committee respond to specific facts concerning the violations at issue.

Therefore, the Office of General Counsel recommends that the Commission approve the sending of the attached subpoena to produce documents and order to submit written answers to Juan Scott in furtherance of our investigation. Since the Coalition has failed to respond to the past two letters from the Commission, compulsory process is being recommended to avoid further delay in obtaining the facts. The subpoena and order is also being sent to Juan Scott at his home address and not the Coalition's post office box.

III. RECOMMENDATIONS

1. Approve and send the attached subpoena to produce documents and order to submit written answers to Juan Scott, Treasurer of the Urban Coalition.

2. Approve and send the attached letter.

Charles N. Steele
General Counsel

May 15, 1985
Date

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments:

1) DeNardis Response
2) Harp Response
3) Proposed Subpoena and Order
4) Proposed Letter

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Thedford

DeNardis

The better congressman
...because results count.

P.O. Box 785, New Haven, CT 06503-0785

85 APR 12 P12: 51

April 10, 1985

Mr. John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1845
DeNardis for Congress
Martin Anastasio, Treasurer

Dear Mr. McGarry:

The Urban Coalition, as previously stated in my letter of November 21, 1984, is an independent committee, not associated with the DeNardis for Congreee Committee in any way.

We have complied with all the information requested under the Federal Election Commission Regulations as stated in 11 CFR Ch.1 Par. 104.3. At no time did the DeNardis for Congress Committee receive any contributions from anyone (including the Urban Coalition) that were not reported in accordance with Federal Election Commission Regulations.

I am not familar with the contents of any filings by the Urban Coalition and since there was no connection with the DeNardis for Congress Committee I do not feel that I have any obligation or responsbility in this area.

If you can be more specific with the details of the alledged violation, perhaps I can better answer the Commissions concern.

Sincerely,

Martin R. Anastasio
Treasurer

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(1)

Wendell C. Harp
74 Dwight Street
New Haven, Connecticut
06511

FEC
85 APR 30 P12:03

April 16, 1985

85 APR 30 P4:01
RECEIVED
GENERAL COUNSEL

Mr. John Warren McGarry, Chariman
1325 K. St., N.W.
Federal Election Commission

Washington, D.C.
20463

RE: MUR 1845/WENDELL HARP @
DENARDIS RE-ELECTION COMMITTEE
URBAN COALITION (PAC)

Dear Mr. McGarry:

In response to your letter of April 2, 1985, and the accompanying questionnaire concerning campaign contributions for the above referenced activities, the following is submitted for your consideration.

I. REPLY TO 7 - POINT QUESTIONNAIRE

1. I was solicited by Mr. Juan Scott for a contribution to the Urban Coalition. (Mr. Scott is personally known to me through various business associations; his role as a Small Business staff member for Senator Weicker; and his past role as Director of the University of New Haven Small Business Development Office.

2. The solicitation for funds to support the Urban Coalition was made in mid-August of 1984.

3. The solicitation was made personally by Mr. Scott. Mr. Scott advised me that he was intending to form a state-wide PAC that would primarily be focused on raising monies to assist congressional candidates who would be sensitive to Hispanic and Black small business concerns. I have known Mr. Scott for years and felt his past business and political experiences in advocating for minority business concerns reinforced the credibility of the Urban Coalition goals.

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4. The solicitation was never referenced toward individual candidates but instead focused upon the goals of how sensitivity to minority business concerns could be achieved by active broad-based political involvement.

5. The solicitation did not allow me to earmark my contribution nor was that ever sought by me.

6. I was not involved in the formation of the Urban Coalition nor was I aware of the expenditure of funds it received.

7. I was involved in Lawrence DeNardis's candidacy as a member of his campaign finance committee for 1984. The existence of the Urban Coalition as a PAC expending funds toward DeNardis candidacy as a sole purpose candidate was not known to me - nor did I believe it was the purpose of the Urban Coalition to do so.

8604059405

II. GENERAL REPLY

I recently had the opportunity to speak to Ms. Thedford concerning what I feel are the facts surrounding this issue. Basically, I contributed to the PAC on the basis of its stated goals of promoting minority business goals through the electoral process. While I was aware of newsletters prepared by the Urban Coalition attesting to DeNardis's record of accomplishment for minority social and business activity - I did not understand these to be campaign contributions (vis a vis monetary donations). And, I was certainly not aware that such an activity could be construed as an additional donation by individual contributor's. Nor, was I aware that the Urban Coalition had not issued or prepared newsletters for other candidates.

It is my understanding from Mr. Scott that the Urban Coalition sent fund solicitation letters to several thousand persons but was not successful in raising but a very small sum of the stated goal. Since I was an early contributor - I of course had no way of knowing that the fund solicitation efforts would be so poor or that the Urban Coalition would be unable to carry-out its stated goals. I believe that an interpretation of violation of the FEC law would be unjust to myself or anyone else who was an early contributor to a PAC and who could not reasonably guarantee the success (or broad-based appeal) of such a PAC. While I ws certainly aware and knowledgeable of DeNardis finance committee affairs - the existence of the Urban Coalition as a sole-purpose supporting PAC never was known. Similarly, the existence of the Urban Coalition was never recognized by myself or other finance committee members as having the DeNardis campaign as any major part of its purpose.

In summary, I feel neither the substance nor intent of the FEC law was violated. While ignorance is no excuse of a law, neither is justice the application of a law where one cannot determine the substance of others actions. I am certain any future donations would be more closely scrutinized by myself, but also realize that there was nothing in my actions which even remotely resembled an attempt to avoid any laws. I respectfully request your consideration of my reply as meritous in resolving this issue.

Sincerely,

Wendell C. Harp

Wendell C. Harp

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Urban Coalition	)	MUR 1845
Juan Scott, Treasurer	)	

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within ten (10) days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on , 1985.

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachment
Interrogatories

8 0 4 4 0 5 9 8

5

INTERROGATORIES TO JUAN SCOTT, TREASURER
OF THE URBAN COALITION

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   c) who distributed it.

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5. Were any of the individuals associated with the Urban Coalition, either currently or formerly, an officer of any DeNardis committee? If so please explain.

6. Were any of the individuals associated with the Urban Coalition, either currently or formerly, receiving any form of compensation or reimbursement from DeNardis, his committees, or agents? If so, please describe.

7. Was the letter by the Urban Coalition based on information about DeNardis' plans, projects, or needs which were provided to you or someone else associated with the Urban Coalition by DeNardis or his agents with a view towards having an expenditure made? If so, please describe.

8. Was the poster by the Urban Coalition based on information about DeNardis' plans, projects or needs which was provided to you or someone else associated with the Urban Coalition by DeNardis or his agents with a view towards having an expenditure made? If so, please describe.

9. Was the tabloid by the Urban Coalition based on information about DeNardis' plans, projects, or needs which was provided to you or someone else associated with the Urban Coalition by DeNardis or his agents with a view towards having an expenditure made? If so, please describe.

10. The attached sheet reflects in-kind contributions totalling $700.11 to the candidacy of Lawrence DeNardis. Please explain your reason for reporting these contributions as such.

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SCHEDULE B

ITEMIZED DISBURSEMENTS

(CONTRIBUTION TO FEDERAL CANDIDATES)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for any commercial purpose, other than using the name and address of any political committee to solicit or contribute to such committee.

Name of Committee (in Full)

Union Coalition C00190173

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Gerald Thornton 600 Winthrop Ave. New Haven, CT 06511	Posters (In-Kind Contri DeNardis Camp. Disbursement for Primary X General Other (specify)	9-14-84	100.00
B. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Tyco 262 Elm Street New Haven, CT	Fundraising letter for DeNardis for Congress In Kind Contri. Disbursement for Primary X General Other (specify)	9-18-84	30.11
C. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
MSA Comp. 22 Broadway North Haven, CT 06473	Printing of Tabloid-In-Kind Contri, DeNardis for Congress Disbursement for Primary X General Other (specify)	9/18/84	200.00
D. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
MSA Comp. 22 Broadway North Haven, CT 06473	Balance Printing Tabloid-In-Kind DeNardis for Congress Disbursement for Primary General Other (specify)	10/5/84	220.00
E. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Peter Adamowich Jr. 113 Broad Street New Britain, CT	In-Kind Photographer DeNardis Disbursement for Primary General Other (specify)	10/11/84	85.00
F. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
Andrea M. Scott 130 Roger White Pe New Haven, CT 065]]	Re-Imbursement 50-Postage In kind DeNardis 15 Envelops Camp. Disbursement for Primary General Other (specify)		65.00
G. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
	Disbursement for Primary General Other (specify)		
H. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
	Disbursement for Primary General Other (specify)		
I. Full Name, Mailing Address and ZIP Code	**Purpose of Disbursement**	**Date (month, day, year)**	**Amount of Each Disbursement This Period**
	Disbursement for Primary General Other (specify)		
SUBTOTAL of Disbursements This Page (optional)			700.11
TOTAL This Period (last page this line number only)			

8

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Juan Scott
130 Roger White Drive
New Haven, Connecticut 06511

RE: MUR 1845
Urban Coalition
Juan Scott, as treasurer

Dear Mr. Scott:

On April 2, 1985, you were notified that the Commission found reason to believe the Urban Coalition and you, as treasurer, violated 2 U.S.C. §§ 434(a), 441d and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires you to provide information and answers which will assist the Commission in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this subpoena and order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this subpoena and order.

If you have any questions, please direct them to Judy Thedford, the staff member handling this matter, at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order
Questions

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(9)

BCC #7330
RECEIVED THE FEC
85 APR 30 P12: 03

Wendell C. Harp
74 Dwight Street
New Haven, Connecticut
06511

April 16, 1985

85 APR 30 P4: 01

Mr. John Warren McGarry, Chariman
1325 K. St., N.W.
Federal Election Commission

Washington, D.C.
20463

RE: MUR 1845/WENDELL HARP @
DENARDIS RE-ELECTION COMMITTEE
URBAN COALITION (PAC)

Dear Mr. McGarry:

In response to your letter of April 2, 1985, and the accompanying questionnaire concerning campaign contributions for the above referenced activities, the following is submitted for your consideration.

I. REPLY TO 7 - POINT QUESTIONNAIRE

1. I was solicited by Mr. Juan Scott for a contribution to the Urban Coalition. (Mr. Scott is personally known to me through various business associations; his role as a Small Business staff member for Senator Weicker; and his past role as Director of the University of New Haven Small Business Development Office.

2. The solicitation for funds to support the Urban Coalition was made in mid-August of 1984.

3. The solicitation was made personally by Mr. Scott. Mr. Scott advised me that he was intending to form a state-wide PAC that would primarily be focused on raising monies to assist congressional candidates who would be sensitive to Hispanic and Black small business concerns. I have known Mr. Scott for years and felt his past business and political experiences in advocating for minority business concerns reinforced the credibility of the Urban Coalition goals.

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4. The solicitation was never referenced toward individual candidates but instead focused upon the goals of how sensitivity to minority business concerns could be achieved by active broad-based political involvement.

5. The solicitation did not allow me to earmark my contribution nor was that ever sought by me.

6. I was not involved in the formation of the Urban Coalition nor was I aware of the expenditure of funds it received.

7. I was involved in Lawrence DeNardis's candidacy as a member of his campaign finance committee for 1984. The existence of the Urban Coalition as a PAC expending funds toward DeNardis candidacy as a sole purpose candidate was not known to me - nor did I believe it was the purpose of the Urban Coalition to do so.

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II. GENERAL REPLY

I recently had the opportunity to speak to Ms. Thedford concerning what I feel are the facts surrounding this issue. Basically, I contributed to the PAC on the basis of its stated goals of promoting minority business goals through the electoral process. While I was aware of newsletters prepared by the Urban Coalition attesting to DeNardis's record of accomplishment for minority social and business activity - I did not understand these to be campaign contributions (vis a vis monetary donations). And, I was certainly not aware that such an activity could be construed as an additional donation by individual contributor's. Nor, was I aware that the Urban Coalition had not issued or prepared newsletters for other candidates.

It is my understanding from Mr. Scott that the Urban Coalition sent fund solicitation letters to several thousand persons but was not successful in raising but a very small sum of the stated goal. Since I was an early contributor - I of course had no way of knowing that the fund solicitation efforts would be so poor or that the Urban Coalition would be unable to carry-out its stated goals. I believe that an interpretation of violation of the FEC law would be unjust to myself or anyone else who was an early contributor to a PAC and who could not reasonably guarantee the success (or broad-based appeal) of such a PAC. While I ws certainly aware and knowledgeable of DeNardis finance committee affairs - the existence of the Urban Coalition as a sole-purpose supporting PAC never was known. Similarly, the existence of the Urban Coalition was never recognized by myself or other finance committee members as having the DeNardis campaign as any major part of its purpose.

In summary, I feel neither the substance nor intent of the FEC law was violated. While ignorance is no excuse of a law, neither is justice the application of a law where one cannot determine the substance of others actions. I am certain any future donations would be more closely scrutinized by myself, but also realize that there was nothing in my actions which even remotely resembled an attempt to avoid any laws. I respectfully request your consideration of my reply as meritous in resolving this issue.

Sincerely,

Wendell C. Harp

Wendell C. Harp

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 22, 1985

Mark Shiffrin, Esquire
P.O. Box 262
New Haven, Connecticut 06502

RE: MUR 1845

Dear Mr. Shiffrin:

Pursuant to your telephone conversation with Judy Thedford on April 16, 1985, we have enclosed a Designation of Counsel Statement for your client to complete and return to the Commission. Upon receipt of the completed Statement, all communications from the Commission will be directed to you.

If you have any questions, please contact Jduy Thedford at (202)523-4000.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosure
Designation of Counsel Statement

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ACC# 7151
Thedford

DeNardis

The better congressman because results count.

P.O. Box 785, New Haven, CT 06503-0785

85 APR 12 P12: 51

April 10, 1985

RECEIVED
GENERAL COUNSEL
85 APR 12 P7: 24

Mr. John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1845
DeNardis for Congress
Martin Anastasio, Treasurer

Dear Mr. McGarry:

The Urban Coalition, as previously stated in my letter of November 21, 1984, is an independent committee, not associated with the DeNardis for Congreee Committee in any way.

We have complied with all the information requested under the Federal Election Commission Regulations as stated in 11 CFR Ch.1 Par. 104.3. At no time did the DeNardis for Congress Committee receive any contributions from anyone (including the Urban Coalition) that were not reported in accordance with Federal Election Commission Regulations.

I am not familar with the contents of any filings by the Urban Coalition and since there was no connection with the DeNardis for Congress Committee I do not feel that I have any obligation or responsbility in this area.

If you can be more specific with the details of the alledged violation, perhaps I can better answer the Commissions concern.

Sincerely,

Martin R. Anastasio
Treasurer

Paid for by DeNardis for Congress Committee, Martin R. Anastasio, Treasurer

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 2, 1985

Martin R. Anastasio, Jr., Treasurer
DeNardis for Congress
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

RE: MUR 1845
DeNardis for Congress
Martin Anastasio, Jr.,
Treasurer

Dear Mr. Anastasio:

The Federal Election Commission notified the DeNardis for Congress Committee and you, as treasurer, on November 18, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on March 12, 1985, determined that there is reason to believe that DeNardis for Congress and you, as treasurer, have violated 2 U.S.C. § 434(b), and no reason to believe that you and your committee violated 2 U.S.C. § 441d. Specifically, it appears that the DeNardis for Congress Committee and you, as treasurer, failed to report in-kind contributions from the Urban Coalition. Additionally, the Commission determined to take no action at ths time to a possible violation of 2 U.S.C. § 441a(f) by you and your committee.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates

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that no further action should be taken against your committee and you, as treasurer, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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 your client wishes the matter to be made public.

If you have any questions, please contact Judy Thedford at 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosure
Procedures

cc: Lawrence J. DeNardis

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 2, 1985

Juan Scott, Treasurer
Urban Coalition
P.O. Box 3086
New Haven, Connecticut 06515

RE: MUR 1845
Urban Coalition
Juan A. Scott, Treasurer

Dear Mr. Scott:

The Federal Election Commission notified the Urban Coalition and you, as treasurer, on November 20, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March 12, 1985, determined that there is reason to believe that the Urban Coalition and you, as treasurer, have violated 2 U.S.C. §§ 434(a), 441d, and 441a(f) with respect to the election of Lawrence DeNardis and no reason to believe you and your committee violated 2 U.S.C. § 433. Specifically, it appears that you and your committee have failed to file reports required by the Act; published a poster without a proper disclaimer as required by 2 U.S.C. § 441d; and received an excessive contribution from Wendell Harp. Additionally, the Commission determined to take no action at this time to a possible violation of 2 U.S.C. § 441a(a) by you and your committee.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates

that no further action should be taken against your committee and you, as treasurer, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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 your client wishes the matter to be made public.

If you have any questions, please contact Judy Thedford at 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosure
Procedures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Wendell Harp
26 Lynwood Place
New Haven, Connecticut 06511

RE: MUR 1845
Wendell Harp

Dear Mr. Harp:

On March , 1985, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information. A copy of the complaint filed against DeNardis for Congress and the Urban Coalition is also attached for your information. The information alleged in the complaint served as a basis for the Commission's determination that the Urban Coalition was an unauthorized single candidate committee supporting the DeNardis' candidacy and as such, contributions to the Coalition count against an individual's 2 U.S.C. § 441a(a)(1)(A) limit.

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

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judy Thedford, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

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

3/28/85

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Martin R. Anastasio, Jr., Treasurer
DeNardis for Congress
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

RE: MUR 1845
DeNardis for Congress
Martin Anastasio, Jr.,
Treasurer

Dear Mr. Anastasio:

The Federal Election Commission notified the DeNardis for Congress Committee and you, as treasurer, on November 18, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on March 12, 1985, determined that there is reason to believe that DeNardis for Congress and you, as treasurer, have violated 2 U.S.C. § 434(b), and no reason to believe that you and your committee violated 2 U.S.C. § 441d. Specifically, it appears that the DeNardis for Congress Committee and you, as treasurer, failed to report in-kind contributions from the Urban Coalition. Additionally, the Commission determined to take no action at ths time to a possible violation of 2 U.S.C. § 441a(f) by you and your committee.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates

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that no further action should be taken against your committee and you, as treasurer, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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 your client wishes the matter to be made public.

If you have any questions, please contact Judy Thedford at 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosure
Procedures

cc: Lawrence J. DeNardis

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3/28/85

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Juan Scott, Treasurer
Urban Coalition
P.O. Box 3086
New Haven, Connecticut 06515

RE: MUR 1845
Urban Coalition
Juan A. Scott, Treasurer

Dear Mr. Scott:

The Federal Election Commission notified the Urban Coalition and you, as treasurer, on November 20, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on March 12, 1985, determined that there is reason to believe that the Urban Coalition and you, as treasurer, have violated 2 U.S.C. §§ 434(a), 441d, and 441a(f) with respect to the election of Lawrence DeNardis and no reason to believe you and your committee violated 2 U.S.C. § 433. Specifically, it appears that you and your committee have failed to file reports required by the Act; published a poster without a proper disclaimer as required by 2 U.S.C. § 441d; and received an excessive contribution from Wendell Harp. Additionally, the Commission determined to take no action at this time to a possible violation of 2 U.S.C. § 441a(a) by you and your committee.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Urban Coalition	)	
Juan A. Scott, Treasurer	)	MUR 1845
DeNardis for Congress	)	
Martin R. Anastasio, Jr.	)	
Treasurer	)	

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session of March 12, 1985, do hereby certify that the Commission took the following actions in MUR 1845:

1. Decided by a vote of 5-0 to find no reason to believe the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 433, and to take no action at this time with respect to a possible violation of 2 U.S.C. § 441a(a).

   Commissioners Aikens, Elliott, Harris, McGarry, and Reiche voted affirmatively for the decision. Commissioner McDonald was not present at the time of the vote.

2. Decided by a vote of 5-0 to find reason to believe the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. §§ 434(a) and 441d by failing to file reports and to affix a proper disclaimer on a campaign poster, and to find reason to believe the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. § 441a(f).

(continued)

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Commissioners Aikens, Elliott, Harris, McGarry and Reiche voted affirmatively for the decision. Commissioner McDonald was not present at the time of the vote.

3. Decided by a vote of 5-0 to find reason to believe Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A) by making contributions to the DeNardis for Congress Committee and to the Urban Coalition which exceed the limitations.

   Commissioners Aikens, Elliott, Harris, McGarry and Reiche voted affirmatively for the decision; Commissioner McDonald was not present at the time of the vote.

4. Decided by a vote of 4-1 to find reason to believe DeNardis for Congress and Martin Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b) by failing to report the receipt of in-kind contributions from the Urban Coalition.

   Commissioners Elliott, Harris, McGarry, and Reiche voted affirmatively for the decision. Commissioner Aikens dissented. Commissioner McDonald was not present at the time of the vote.

5. Decided by a vote of 5-0 to take no action at this time as to a possible violation of 2 U.S.C. § 441a(f) by DeNardis for Congress and Martin Anastasio, Jr., as treasurer, but find no reason to believe DeNardis for Congress and Martin Anastasio, Jr., as treasurer, violated 2 U.S.C. § 441d.

   Commissioners Aikens, Elliott, Harris, McGarry, and Reiche voted affirmatively for the decision. Commissioner McDonald was not present at the time of the vote.

(continued)

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6. Decided by a vote of 5-0 to direct the Office of General Counsel to send appropriate letters pursuant to the actions taken this date.

Commissioners Aikens, Elliott, Harris, McGarry and Reiche voted affirmatively for the decision; Commissioner McDonald was not present at the time of the vote.

Attest:

3-14-85
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY
85 MAR 4 A 9:01

In the Matter of	)	
	)	
Urban Coalition	)	MUR 1845
Juan A. Scott, Treasurer	)	
DeNardis for Congress	)	
Martin R. Anastasio, Jr.	)	
Treasurer	)	

GENERAL COUNSEL'S REPORT

I. SUMMARY OF ALLEGATIONS

On November 5, 1984, Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee, filed a complaint with the Commission against the Urban Coalition ("the Coalition") and DeNardis for Congress ("DeNardis Committee"). The complainant alleged that the Coalition:

1) failed to register properly;

2) failed to file a report;

3) solicited and accepted funds in excess of the limits as evidenced by a solicitation letter submitted with the complaint;

4) expended funds in excess of the $1,000 limit on behalf of DeNardis as evidenced by a solicitation letter submitted with the complaint;

5) published and paid for a campaign flyer in coordination with DeNardis which makes false accusations as evidenced by the copy of the flyer submitted with the complaint;

6) improperly used the stationery and frank of Senator Lowell Weicker;

7) published and paid for a campaign poster without affixing a proper disclaimer; and

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8) conspired with the DeNardis Committee to avoid campaign limitations by creating an independent political committee, the Coalition.

Further the complainant alleged that the DeNardis for Committee:

1) accepted funds in excess of the $1,000 limit from the Coalition;

2) failed to report in-kind contributions from the Coalition;

3) conspired with the Coalition to avoid limitations by creating an "independent" political action committee; and

4) published and paid for a campaign poster without affixing a proper disclaimer.

Submitted with the complaint was a copy of the Coalition's Statement of Organization, solicitation letter, and flyer.

Copies of the complaint were forwarded to the respondents on November 13, 1984. A response was received from the DeNardis Committee on November 29, 1984.

The DeNardis Committee response denies association with the Coalition and that in-kind contributions were made to it by the Coalition. The DeNardis Committee claims the Coalition is an independent commmittee and that any expenditures made on behalf of DeNardis' candidacy were independent expenditures. With regard to the disclaimer allegation, the DeNardis Committee claims the poster is a product of the Coalition and, therefore, any disclaimer problems should be directed to the Coalition.

Lastly, the DeNardis Committee denies any coordination with the Coalition or any conspiracy to violate FEC laws.

No response has been filed by the Coalition.

II. FACTUAL AND LEGAL ANALYSIS

Since this matter involves a number of allegations against each respondent, each respondent will be addressed separately.

A. The Urban Coalition

1) 2 U.S.C. § 433

It is alleged that the Coalition failed to register properly. Specifically, the Coalition is accused of failing to designate what type of committee it is.

A review of the Statement of Organization filed by the Coalition reveals that box (f) under line 5 has been checked. This line designates the committee type. The Coalition registered as a committee supporting/opposing more than one Federal candidate and is not a separate segregated fund nor a party committee.

The Office of General Counsel, therefore, recommends that the Commission find no reason to believe the Coalition violated 2 U.S.C. § 433.

2) 2 U.S.C. § 434(a)

The second allegation states that the Coalition failed to file a required report. Specifically, the complainant alleges that a report was due October 20, 1984, and has not been filed.

A review of the reports filed by the Coalition indicates that the 1984 October Quarterly report was filed on October 26,

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1984, and no other reports have been filed. The report covered 9/14/85 through 10/11/84. Pursuant to 2 U.S.C. § 434(a), the Coalition's 1984 October Quarterly Report was due October 15, 1984, and should have covered 9/14/84, the date the Coalition registered, through 9/30/84. The report was 11 days late.

The next reports required to be filed by the Coalition are the 12 Day Pre-General Election Report, the 30 Day Post-General Election Report and the Year-End Report. The 12 Day Pre-General Election Report was due October 25, 1984, covering 10/1/84 through 10/17/84. Most of this time period was included on the Coalition's October Quarterly report, five days are unaccounted for. The 30 Day Post-General Election Report was due December 6, 1984, covering 10/18/84 through 11/26/84. The Year-End Report was due January 31, 1985 covering 11/27/84 through 12/31/84.

The Office of General Counsel, therefore, recommends that the Commission find reason to believe the Coalition violated 2 U.S.C. § 434(a)(4)(A) for its late filing of the 1984 October Quarterly Report and its failure to file the 12 Day Pre-General Election, 30 Day Post-General Election and Year-End reports.

3) 2 U.S.C. §§ 441a(a) and 441a(f)

It is alleged that the Coalition solicited, accepted, and disbursed funds in excess of the limits set forth at § 441a. The complainant supports the allegation by submitting a copy of a solicitation letter sent out by the Coalition. This letter requests contributions up to $5,000 per year and states its intention to raise and spend $30,000 for DeNardis.

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2 U.S.C. § 441a(a)(1)(C) limits the contributions that an individual may make to a political committee to $5,000 per calendar year.

2 U.S.C. § 441a(a)(1)(A) limits the contributions that a non-multicandidate political committee may make to a candidate to $1,000 per election.

2 U.S.C. § 441a(f) prohibits any political committee from accepting contributions or making contributions in excess of the limits.

The solicitation letter submitted by the complainant requested contributions up to $5,000 per year. This solicitation, therefore, is clearly within the limits of the Act set forth at 2 U.S.C. § 441a(a)(1)(C). A review of the Coalition's October Quarterly report reveals that no individual is reported as making a contribution in excess of $5,000 and disbursements to DeNardis total $700.11. The disbursements to DeNardis are reported by the Coalition as in-kind contributions and not independent expenditures as alleged by the complainant. Clearly, the Coalition has not accepted contributions in excess of the limitations ($5,000) or made expenditures on behalf of DeNardis in excess of the limits ($1,000).

The Office of General Counsel, therefore, recommends that the Commission find no reason to believe the Coalition violated 2 U.S.C. § 441a(f) and § 441a(a).

4) 2 U.S.C. § 441d

It is alleged that the Coalition published and paid for a poster which failed to carry a § 441d disclaimer. The poster is

described as carrying DeNardis' name and a rainbow. A copy of the poster was not submitted by the complainant.

A review of the Coalition's report reveals a $100 expenditure for DeNardis posters on September 14, 1984. Since the DeNardis Committee response indicates that the Coalition is responsible for the posters, and the Coalition failed to respond to the Commission's notice of complaint, the allegation that the poster failed to contain a § 441d disclaimer has not been refuted.

The Office of General Counsel, therefore, recommends that the Commission find reason to believe that the Coalition violated 2 U.S.C. § 441d by failing to display the required disclaimer.

5) 2 U.S.C. § 441a(a)(1)(A) and 11 C.F.R. § 110.1(h)

It is alleged that the DeNardis Committee and the Coalition conspired to create an independent political action committee in order to avoid campaign limitations and that the activities of the two committees were coordinated.

It is difficult to determine the validity of this allegation based on the evidence submitted. However, the Coalition reported its activity on behalf of DeNardis as in-kind contributions, not independent expenditures. Therefore, the Coalition's activity would be subject to the contribution limitations of the Act.

Two contributors are itemized on the Coalition's report, Juan Scott, its treasurer, and Wendell Harp. Both Scott and Harp gave $1,000 to the Coalition, Mr. Harp's $1,000 contribution is dated September 14, 1984. Mr. Harp is also listed as contributor

to the DeNardis Committee. He gave $300 for the primary election on March 19, 1984, and $1,000 for the general election on March 29, 1984.

Pursuant to 11 C.F.R. § 110.1(h), an individual may contribute to a candidate or his authorized committee with respect to a particular election and also contribute to a political committee supporting the same candidate in the same election as long as:

1- the committee is not the candidate's principal campaign committee, an authorized committee or a single candidate committee;

2- the contributor does not give with the knowledge that a substantial portion of the contribution will be expended on that same candidate for the same election; and

3- the contributor does not retain control over the funds.

In this particular situation, Mr. Harp, a contributor to both the Coalition and the DeNardis Committee, would have known, based on the solicitation letter, that the funds he was contributing to the Coalition would support DeNardis. Also, the Coalition acted as a single candidate committee by only supporting DeNardis. Thus, the contribution to the Coalition would count against his individual contribution limitation of $1,000 per election to a candidate resulting in an excessive contribution of $1,000 for the general election.*/ The Office of

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*/ Since Mr. Harp's contribution to the Coalition was received after the date of the Connecticut primary, September 11, 1984, the contribution is attributed to the general election pursuant to 11 C.F.R. § 110.1(a)(2)(ii).

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General Counsel recommends finding reason to believe Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A). Furthermore, in order to ascertain the circumstances surrounding Harp's contribution to the Coalition, it is recommended that interrogatories be issued to Mr. Harp.

Since the Coalition is not an authorized committee of candidate DeNardis, it was not required to file reports with DeNardis' principal campaign committee pursuant to 2 U.S.C. § 432(f). Therefore, neither the Coalition or the DeNardis Committee were in a position to know whether its contributor had reached the contribution limit. Therefore, the Office of General Counsel will not recommend that reason to believe findings be made against the Coalition or the DeNardis Committee for a violation of 2 U.S.C. § 441a(f).

6) Other Allegations

The two allegations which deal with the publishing of campaign material making false accusations and the improper use of Senator Weicker's stationery and frank do not fall within the Commission's jurisdiction.

B) DeNardis for Congress

It is alleged that the DeNardis Committee accepted funds in excess of $1,000 from the Coalition. As previously discussed on page 5, the Coalition made contributions (in-kind) totalling $700.10 to DeNardis. This activity is within the $1,000 limitation. It is recommended that the Commission find no reason to believe the DeNardis Committee violated 2 U.S.C. § 441a(f).

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2) 2 U.S.C. § 434(b)

It is alleged that the DeNardis Committee failed to report in-kind contributions from the Coalition. From a review of the DeNardis reports, these in-kind contributions are not reported. The DeNardis Committee response indicates that the Coalition's activity constituted independent expenditures. However, the Coalition reported its activity as in-kind contributions. The Office of General Counsel recommends that the Commission find reason to believe the DeNardis Committee violated 2 U.S.C. § 434(b) by failing to report the receipt of in-kind contributions from the Coalition.

3) 2 U.S.C. § 441a(f)

The third allegation is that the DeNardis Committee conspired with the Coalition to avoid the contribution limitations by creating an independent committee, the Coalition, to conduct coordinated activities.

This allegation is the same as the fifth allegation made against the Coalition discussed previously.

As the Coalition reported its activity as in-kind contributions and that activity falls within the prescribed limitations, the Office of General Counsel recommends that the Commission find no reason to believe the DeNardis Committee accepted excessive funds from the Coalition in violation of 2 U.S.C. § 441a(f).

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4) 2 U.S.C. § 441d

The complainant alleges that posters appearing throughout New Haven with DeNardis' name and rainbow failed to have a proper disclaimer.

As expenditures for posters are listed by the Coalition, and the DeNardis Committee denies that it is responsible for the posters, the Office of General Counsel recommends that the Commission find no reason to believe the DeNardis Committee violated 2 U.S.C. § 441d.

III RECOMMENDATIONS

The Office of General Counsel recommends that the Commission:

1. Find no reason to believe the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. §§ 433, 441a(a) and 441a(f).
2. Find reason to believe the Urban Coalition and Juan Scott, as treasurer, violated 2 U.S.C. §§ 434(a) and 441d by failing to file reports and to affix a proper disclaimer on a campaign poster.
3. Find reason to believe Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A) by making contribution to the DeNardis for Congress Committee and to the Urban Coalition which exceed the limitations.
4. Find reason to believe DeNardis for Congress and Martin Anastasio, Jr., as treasurer, violated 2 U.S.C. § 434(b) by failing to report the receipt of in-kind contributions from the Urban Coalition.

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5. Find no reason to believe DeNardis for Congress and Martin Anastasio, Jr., as treasurer, violated 2 U.S.C. § 441a(f) and § 441d.

6. Send the attached letters.

Charles N. Steele
General Counsel

March 1, 1985
Date

By: Kenneth A. Gross
Associate General Counsel

Attachments
DeNardis Response
Proposed Letters
Factual and Legal Analysis

R 5 0 4 0 5 9 4 4 4 0

DeNardis
The better congressman ... because results count.
P.O. Box 785, New Haven CT 06503-0785
288-1984

RECEIVED FEC 1984 NOV 29 A 9:15

November 21, 1984

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

Dear Mr. Steele:

This letter is a reply to your correspondence of November 13, 1984 notifying the DeNardis for Congress Committee of a complaint filed with the Federal Election Commission by Mr. Vincent Mauro, Democratic Town Chairman of New Haven, Connecticut.

The Urban Coalition, about whom Mr. Mauro filed his complaint is an independent committee, not associated with the DeNardis for Congress Committee. Any expenditures that the Urban Coalition may have made in support of the candidacy of Larry DeNardis were independent expenditures undertaken by the Urban Coalition. They were not, as Mr. Mauro alleges, in-kind contributions to the DeNardis campaign.

The poster carrying the DeNardis name and a rainbow referred to in the letter by the complainant, was a product of the Urban Coalition, not of the DeNardis for Congress Committee. Any discussion of a disclaimer on these posters should be directed to the Urban Coalition not the DeNardis for Congress Committee.

The DeNardis for Congress Committee did not coordinate its activities with the Urban Coalition, nor did it conspire to violate FEC law. The DeNardis Committee has fully complied with FEC regulations and requirements. No evidence was presented in these allegations to the contrary.

The Urban Coalition is a committee independent of the DeNardis for Congress Committee. No action should be taken against the DeNardis Committee for the Urban Coalition's alleged violation of FEC regulations.

Sincerely,

Martin R. Anastasio
Treasurer

MRA:rs

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Martin R. Anastasio, Jr., Treasurer
DeNardis for Congress
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

RE: MUR 1845
DeNardis for Congress
Martin Anastasio, Jr.,
Treasurer

Dear Mr. Anastasio:

The Federal Election Commission notified the DeNardis for Congress Committee and you, as treasurer, on November 18, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, and information supplied by you, the Commission, on March , 1985, determined that there is reason to believe that DeNardis for Congress and you, as treasurer, have violated 2 U.S.C. § 434(b), and no reason to believe that you and your committee violated 2 U.S.C. § 441a(f) and § 441d. Specifically, it appears that the DeNardis for Congress Committee and you, as treasurer, failed to report in-kind contributions from the Urban Coalition.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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(2)

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 your client wishes the matter to be made public.

If you have any questions, please contact Judy Thedford at 523-4000.

Sincerely,

John Warren McGarry
Chairman

Enclosure
Procedures

cc: Lawrence J. DeNardis

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Juan Scott, Treasurer
Urban Coalition
P.O. Box 3086
New Haven, Connecticut 06515

RE: MUR 1845
Urban Coalition
Juan A. Scott, Treasurer

Dear Mr. Scott:

The Federal Election Commission notified the Urban Coalition and you, as treasurer, on November 20, 1984, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to you at that time.

Upon further review of the allegations contained in the complaint, the Commission, on February , 1985, determined that there is reason to believe that the Urban Coalition and you, as treasurer, have violated 2 U.S.C. §§ 434 and 441d, and no reason to believe you and your committee violated 2 U.S.C. §§ 433, 441a(a) and 441a(f). Specifically, it appears that you and your committee have failed to file reports required by the Act and published a poster without a proper disclaimer as required by 2 U.S.C. § 441d.

You may submit any factual or legal materials that you believe are relevant to the Commission's analysis of this matter. Please submit any such response within ten days of your receipt of this notification.

The Office of General Counsel would like to settle this matter through conciliation prior to a finding of probable cause. However, in the absence of any information which demonstrates that no further action should be taken against your committee and you, as treasurer, the Office of General Counsel must proceed to the next compliance stage as noted on page 2, paragraph 2 of the enclosed procedures.

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(4)

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 your client wishes the matter to be made public.

If you have any questions, please contact Judy Thedford at 523-4000.

Sincerely,

Enclosure
Procedures

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Wendell Harp
26 Lynwood Place
New Haven, Connecticut 06511

RE: MUR 1845
Wendell Harp

Dear Mr. Harp:

On March , 1985, the Federal Election Commission determined that there is reason to believe you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information. A copy of the complaint filed against DeNardis for Congress and the Urban Coalition is also attached for your information. The information alleged in the complaint served as a basis for the Commission's determination that the Urban Coalition was an unauthorized single candidate committee supporting the DeNardis' candidacy and as such, contributions to the Coalition count against an individual's 2 U.S.C. § 441a(a)(1)(A) limit.

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

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if so desired. See 11 C.F.R. § 111.18(d).

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

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Judy Thedford, at (202) 523-4000.

Sincerely,

John Warren McGarry
Chairman

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

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

MUR 1845
STAFF MEMBER(S) & TEL. NO.
Judy Thedford (202) 523-4000

RESPONDENT Wendell Harp

SUMMARY OF ALLEGATIONS

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, it appears that Wendell Harp has violated 2 U.S.C. § 441a(a)(1)(A) by contributing in excess of $1,000 per election to the candidacy of Lawrence DeNardis.

FACTUAL BASIS AND LEGAL ANALYSIS

Two contributors are itemized on the Urban Coalition's 1984 October Quarterly Report, Juan Scott, its treasurer, and Wendell Harp. Both Scott and Harp gave $1,000 to the Urban Coalition, Mr. Harp's $1,000 contribution is dated September 14, 1984. Mr. Harp is also listed as contributor to DeNardis for Congress. He gave $300 for the primary election on March 19, 1984, and $1,000 for the general election on March 29, 1984.

Pursuant to 11 C.F.R. § 110.1(h), an individual may contribute to a candidate or his authorized committee with respect to a particular election and also contribute to a political committee supporting the same candidate in the same election as long as:

1- the committee is not the candidate's principal campaign committee, an authorized committee or a single candidate committee;

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2- the contributor does not give with the knowledge that a substantial portion of the contribution will be expended on that same candidate for the same election; and

3- the contributor does not retain control over the funds.

In this particular situation, Mr. Harp, a contributor to both the Urban Coalition and DeNardis for Congress, would have known, based on the solicitation letter, that the funds he was contributing to the Urban Coalition would support DeNardis. Also, the Urban Coalition acted as a single candidate committee by only supporting DeNardis. Thus, the contribution by Harp to the Urban Coalition would count against his individual contribution limitation of $1,000 per election to a candidate resulting in an excessive contribution of $1,000 for the general election.*/ The Office of General Counsel recommends find reason to believe Wendell Harp violated 2 U.S.C. § 441a(a)(1)(A).

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*/ Since Mr. Harp's contribution to the Urban Coalition was received after the date of the Connecticut primary, September 11, 1984, the contribution is attributed to the general election pursuant to 11 C.F.R. § 110.1(a)(2)(ii).

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Questions to be answered by Wendell Harp
concerning his $1,000 contribution to
the Urban Coalition on September 14, 1984

1. By whom were you solicited to make a contribution to the Urban Coalition?

2. When was the subject solicitation made?

3. How was the solicitation made (phone, letter, personally, etc.)? If you were solicited by letter, please submit a copy.

4. Did the solicitation identify the candidate(s) the Urban Coalition would support? If so, please name the candidate(s).

5. Did the solicitation allow you to earmark your contribution for a certain candidate? If so, did you earmark your contribution and to which candidate(s).

6. Were you involved in the formation of the Urban Coalition? If so, please explain your role.

7. Were you involved in Lawrence DeNardis's candidacy for the U.S. House of Representatives in 1984? If so, explain your role.

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SENSITIVE

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

RECEIVED
OFFICE OF THE FEC
COMMISSION SECRETARY

FIRST GENERAL COUNSEL'S REPORT

84 DEC 20 A8:52

DATE AND TIME OF TRANSMITTAL BY OGC TO THE COMMISSION 12/20/84 - 8:50

MUR 1845
DATE COMPLAINT RECEIVED BY OGC 11/5/84
DATE OF NOTIFICATION TO RESPONDENT 11/13/84
STAFF MEMBER Thedford

COMPLAINANT'S NAME: Vincent E. Mauro, Chairman
New Haven Democratic Town Committee

RESPONDENTS' NAME: DeNardis for Congress
Martin R. Anastasio, Treasurer
Urban Coalition
Juan A. Scott, Treasurer

RELEVANT STATUTE: 2 U.S.C. §§ 433, 434, 441a, 11 C.F.R. § 110.1(h)(1)

INTERNAL REPORTS CHECKED: DeNardis for Congress
Urban Coalition

FEDERAL AGENCIES CHECKED: N/A

SUMMARY OF ALLEGATIONS

On November 5, 1984, Vincent E. Mauro, Chairman of the New Haven Democratic Town Committee, filed a complaint with the Commission against the Urban Coalition ("the Coalition") and DeNardis for Congress ("DeNardis Committee"). The complainant alleged that the Coalition:

1) failed to register properly;

2) failed to file a report;

3) solicited and accepted funds in excess of the $5,000 limits;

4) expended funds in excess of the $1,000 limit on behalf of DeNardis;

5) published and paid for campaign flyer in coordination with DeNardis which makes false

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accusations;

6) improperly used the stationery and frank of Senator Lowell Weicker;

7) published and paid for campaign material without a disclaimer; and

8) conspired with DeNardis Committee to avoid campaign limitations by creating an independent political committee.

The allegations against the DeNardis Committee are as follows:

1) Acceptance of funds in excess of the $1,000 limit from the Urban Coalition;

2) Failure to report in-kind contributions from the Urban Coalition; and

3) conspiracy with the Urban Coalition to avoid limitations by creating an "independent" political action committee.

Submitted with the complaint was a copy of the Coalition's Statement of Organization and a solicitation letter and tabloid paid for by the Coalition.

Copies of the complaint were forwarded to the respondents on November 13, 1984. A response was received from DeNardis Committee on November 29, 1984.

Currently, the Office of General Counsel is reviewing the allegations, the DeNardis response, and reports filed by the DeNardis Committee and the Coalition. Due to the numerous

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allegations at issue and the need to analyze and address each allegation, additional time is needed. Therefore, a report with recommendations will be presented to the Commission shortly.

Charles N. Steele
General Counsel

Dec. 19, 1977
Date

By: Kenneth A. Gross
Associate General Counsel

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DeNardis
The better congressman
...because results count.
P.O. Box 785, New Haven, CT 06503-0785
288-1984

RECEIVED BY THE FEC
GCL#5817
84 NOV 29 A9:15
84 NOV 29 A9:58
GENERAL COUNSEL

November 21, 1984

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

Dear Mr. Steele:

This letter is a reply to your correspondence of November 13, 1984 notifying the DeNardis for Congress Committee of a complaint filed with the Federal Election Commission by Mr. Vincent Mauro, Democratic Town Chairman of New Haven, Connecticut.

The Urban Coalition, about whom Mr. Mauro filed his complaint is an independent committee, not associated with the DeNardis for Congress Committee. Any expenditures that the Urban Coalition may have made in support of the candidacy of Larry DeNardis were independent expenditures undertaken by the Urban Coalition. They were not, as Mr. Mauro alleges, in-kind contributions to the DeNardis campaign.

The poster carrying the DeNardis name and a rainbow referred to in the letter by the complainant, was a product of the Urban Coalition, not of the DeNardis for Congress Committee. Any discussion of a disclaimer on these posters should be directed to the Urban Coalition not the DeNardis for Congress Committee.

The DeNardis for Congress Committee did not coordinate its activities with the Urban Coalition, nor did it conspire to violate FEC law. The DeNardis Committee has fully complied with FEC regulations and requirements. No evidence was presented in these allegations to the contrary.

The Urban Coalition is a committee independent of the DeNardis for Congress Committee. No action should be taken against the DeNardis Committee for the Urban Coalition's alleged violation of FEC regulations.

Sincerely,

Martin R. Anastasio
Treasurer

MRA:rs

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Paid for by DeNardis for Congress Committee Martin R. Anastasio, Treasurer

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 13, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Martin R. Anastasio, Jr.
Treasurer
DeNardis for Congress Committee
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

Re: MUR 1845

Dear Mr. Anastasio:

This letter is to notify you that on November 5, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, as treasurer may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1845. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

If you have any questions, please contact Judy Thedford, the staff person assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

cc: Lawrence J. DeNardis

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 13, 1984

Vincent E. Mauro
Chairman
New Haven Democratic
Town Committee
823 Edgewood Avenue
New Haven, Connecticut 06515

Dear Mr. Mauro:

This letter is to acknowledge receipt of your complaint which we received on November 5, 1984, against The Urban Coalition, DeNardis for Congress Committee, and Martin R. Anastasio, Jr., which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondent will be notified of this complaint within five days.

You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. We suggest that this information be sworn to in the same manner as your original complaint. For your information, we have attached a brief description of the Commission's procedure for handling complaints. If you have any questions, please contact Barbara A. Johnson at (202) 523-4143.

Sincerely,

Charles N. Steele
General Counsel

By Kenneth A. Gross
Associate General Counsel

Enclosure

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 13, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Juan H. Scott
Treasurer
The Urban Coalition
P.O. Box 3086 - Westville Station
New Haven, Connecticut 06515

Re: MUR 1845

Dear Mr. Scott:

This letter is to notify you that on November 5, 1984 the Federal Election Commission received a complaint which alleges that The Urban Coalition may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1845. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against The Urban Coalition in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

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If you have any questions, please contact Judy Thedford, the staff person assigned to this matter at (202) 523-4000. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
General Counsel

By: Kenneth A. Gross
Associate General Counsel

Enclosures
1. Complaint
2. Procedures
3. Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 13, 1984

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Martin R. Anastasio, Jr.
Treasurer
DeNardis for Congress Committee
1768 Litchfield Turnpike
Woodbridge, Connecticut 06525

Re: MUR 1845

Dear Mr. Anastasio:

This letter is to notify you that on November 5, 1984 the Federal Election Commission received a complaint which alleges that the committee and you, as treasurer may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 1845. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate, in writing, that no action should be taken against the committee and you, as treasurer in connection with this matter. Your response must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath.

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

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Vincent E. Mauro
DEMOCRATIC TOWN CHAIRMAN
823 Edgewood Avenue
New Haven, Connecticut 06515

GCC#5504
RECEIVED AT THE FEC
84 NOV 5 A11:57
84 NOV 5 P1:29
GENERAL COUNSEL

MUR 1845

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

RE: Urban Coalition
DeNardis for Congress

Dear Mr. Steele:

This letter is a formal complaint about activities of the candidate campaign committee and the political action committee listed above. The substance of the complaint is as follows:

I. The political action committee, the Urban Coalition has:

A) Failed to register properly. The type of political action committee was not indicated on the registration forms (see attached registration form).

B) Failed to file a required report. The first report of the Urban Coalition was due on October 20, 1984, and has not yet been filed. The delinquency violates the law and deprives voters the opportunity to review contributions to and expenditures on behalf of candidates prior to an election. (see FEC file on Urban Coalition).

C) Solicited funds from individuals in excess of legal limitations. (See attached solicitation letter, page 3.) The $5,000 request exceeds the amount allowed by law unless the committee has been registered for six months.

D) Expended more in support of Lawrence J. DeNardis than is allowed by law. (See attached solicitation letter.) The letter indicates that the committee intends to spend $30,000 and has already collected $9,000. Subsequent public statements raised the objective to $40,000. All of the estimates clearly exceed the required limit of $1,000 for a political action committee of less than six months.

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E) Accepted contributions in excess of legal limitations. Although no report has been filed, there is reason to believe that the initial contribution came from fewer than nine people.

F) Published and paid for, in coordination with DeNardis for Congress, a campaign flyer which makes false representations. The flyer (attached hereto) depicts individuals as supporters who are not supporters.

G) Improperly used federal funds. Juan Scott, the treasurer of the Urban Coalition, used the stationery and frank of Senator Lowell Weicker to communicate with an individual to whom the campaign flyer had been delivered. The letter included a typed return address which is that of the Urban Coalition.

H) Published and paid for campaign material without the disclaimer required by 11 CFR 110.11. A poster carrying the name DeNardis and a rainbow, without any disclaimer, has been posted throughout the City of New Haven.

I) Conspired with DeNardis for Congress to avoid campaign finance limitations through the creation of an independent political action committee, the activities of which are actually coordinated with DeNardis for Congress.

II. DeNardis for Congress has:

A) Accepted support from the Urban Coalition in excess of the amount allowed by law. The Urban Coalition has expended more than $1,000 in support of Lawrence J. DeNardis.

B) Failed to include the in-kind support received from the Urban Coalition in its periodic FEC financial reports (see DeNardis for Congress campaign finance reports on file).

C) Conspired with Juan Scott and the Urban Coalition to avoid compliance with Federal elections finance limitations through creation of an "independent" political action committee, the activities of which are actually coordinated with DeNardis for Congress and which has consistently failed to comply with campaign election laws.

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D) Published and paid for campaign material without the disclaimer required by 11 CFR 110.11. A poster carrying the name DeNardis and a rainbow, without any disclaimer, has been posted throughout New Haven.

This letter should be considered a formal complaint.

We request that the Commission order the Urban Coalition to cease and desist the solicitation and expenditure of funds until such time as the required report is filed; to return all funds collected in violation of law from the treasury of the Urban Coalition; to return funds expended illegally by the Urban Coalition to recorded contributors from the treasury of DeNardis for Congress; and such other penalties as may be deemed appropriate.

Thank you for your consideration.

Sincerely,

Vincent E. Mauro
Chairman
New Haven Democratic Town Committee

Subscribed and sworn to before me this 30th day of October, 1984.

Notary Public
My Commission Expires 4/1/85

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Please give to Berlyne Glover

STATEMENT OF ORGANIZATION

1. (a) Name of Committee (in full)
Urban Coalition

(b) Address (Number and Street)
P.O. Box 308

(c) City, State and ZIP Code
New Haven, CT 06515

2. Check if name or address is changed

3. Date
September [illegible]

4. FEC Identification Number
No

5. Is this an unauthorized committee?

6. TYPE OF COMMITTEE (Check one)

A. (a) This committee is a principal campaign committee. (Complete the candidate information below.)

B. (a) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate	Candidate Party Affiliation	Office Sought	Identification

C. (a) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(Name of candidate)

D. (a) This committee is a _____ committee of the _____ Party.
(Principal, State or subordinate) (Democratic, Republican, etc.)

E. (a) This committee is a separate segregated fund.

F. (a) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

Type or Print Name of Treasurer	Signature of Treasurer	Date
Juan M. Scott	[illegible]	9/30/84

NOTE: [illegible] information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

For further information contact: Federal Election Commission Toll Free 800-424-9530, Local 202-523-4068

THE URBAN COALITION

Box 3086 - Westville Station
New Haven, Connecticut 06515

Dear Friend:

The Urban Coalition for Larry DeNardis seeks your help and financial support. As you are aware, in 1982, Larry DeNardis lost the City of New Haven by over 16,000 votes. In the City's Black community, he received a mere 6% of the vote. These dismal results are primarily attributable to the absence of a grass-roots organization in behalf of Larry DeNardis' campaign.

The Urban Coalition has taken on the responsibility of mounting a drive for DeNardis within the inner-city of New Haven. These areas have traditionally voted over 95% Democratic. The Incumbent has managed to develop a well-polished, public relations effort designed to inflate his dismal record of the last two years.

Larry DeNardis truly represents the community interests. He has a genuine story to tell and deserves to receive support from the inner-city voters. Unless this message is developed, articulated and presented in a cogent fashion, Larry will, once again, lose New Haven's Black community by a margin of 20 to 1.

We need volunteers — but more importantly -- we need financial contributions which will allow us to present a strong effort. Currently, we have secured committments from local Black businessmen of $9,000. In our estimation, a minimum war-chest of $30,000 will be necessary to wage a competitive battle in the inner-city.

PAID FOR AND SPONSORED BY THE URBAN COALITION
JUAN SCOTT, TREASURER

Dear Friend
Page two

Please find attached a brief outline of the Campaign Action Plan. To make financial contributions to the Urban Coalition for Larry DeNardis, an instructional sheet is attached for your convenience.

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CAMPAIGN ACTION PLAN

		BUDGET
(A)	Information Dissemenation	
	Three (3) Pieces: Two Positive One Negative about the opposition	$ 5,000
(B)	1,000 - Sixty Second Radio Parts	15,000
(C)	Posters, Signs & Flyers	3,000
(D)	Fifty (50) Canvassers	
	35 - Door Canvassers for Fourty Days 15 - Phone Canvassers	7,000
(E)	Operation of Two Inner-City Headquarters, including Staff, Phone and General Administrative Overhead	3,000
(F)	Election Day Expenses	7,000
	TOTAL BUDGET	$30,000

Note: This budget represents an ideal level to defeat the incumbent. If the goal of $30,000 is not realized, then expenditures will be scale down proportionally.

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PLEASE SEND CONTRIBUTION TO:

The Urban Coalition
Juan Scott, Treasurer
Box 3065 Westville Station
New Haven, CT 06515

The Urban Coalition is registered with the United States Federal Elections Commission and is authorized to accept contribution and to expend funds on behalf of candidates for Federal office.

An indivual may contribute up to $5,000 per calendar year. Contribution made from the treasury funds of corporations are prohibited.

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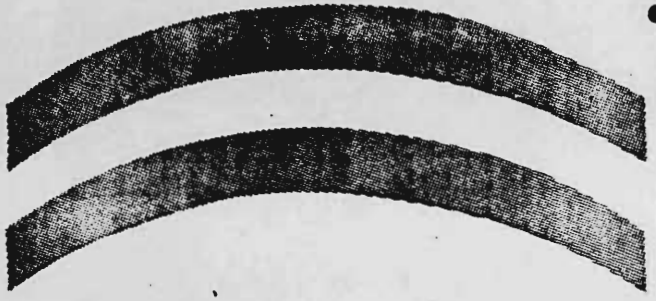
The Urban Coalition



Larry DeNardis

Deserves

The Black Vote

(seen above, left to right: Alderman Joshua Moore, Larry DeNardis, Juan Scott)

He Has Delivered!

Paid For By The Urban Coalition
Juan A. Scott, Treasurer

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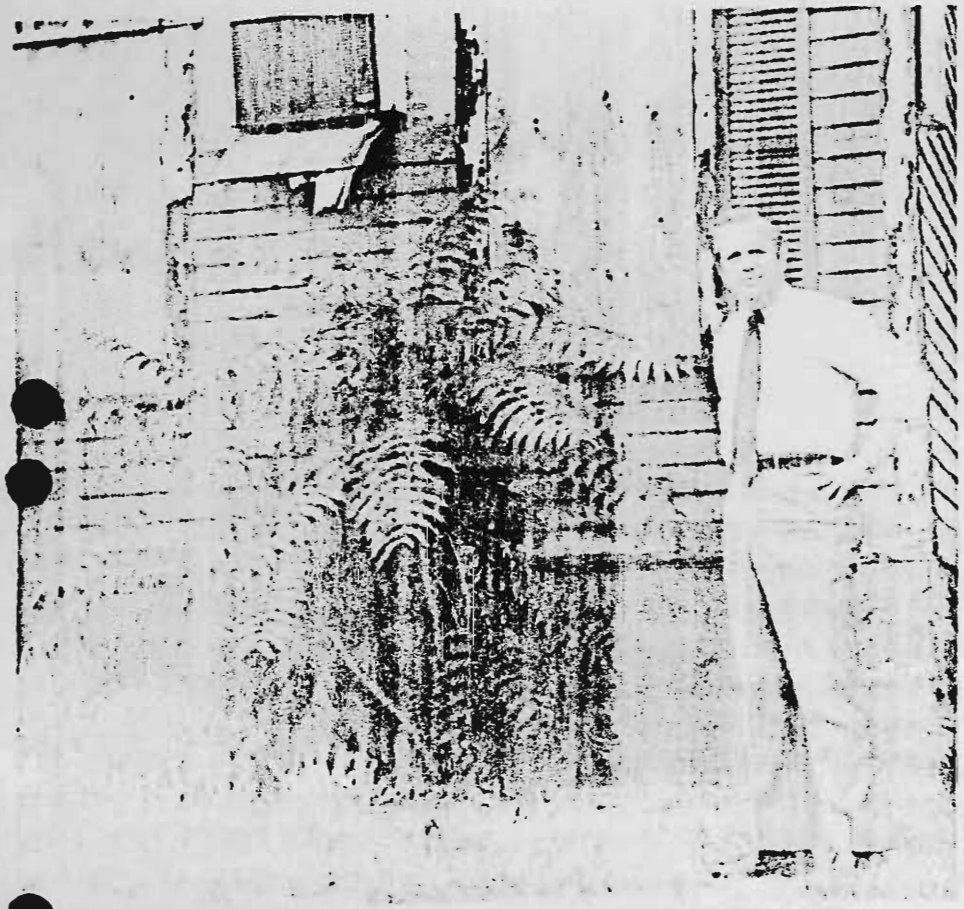
He Supports Black Business Which Means Support for Jobs!

8 5 0 4 0 1 9 4 4 7 1



He Has Secured Better Housing and Living Conditions

- Westwood Village
- Renaissance Hill
- Casa Otonal Housing

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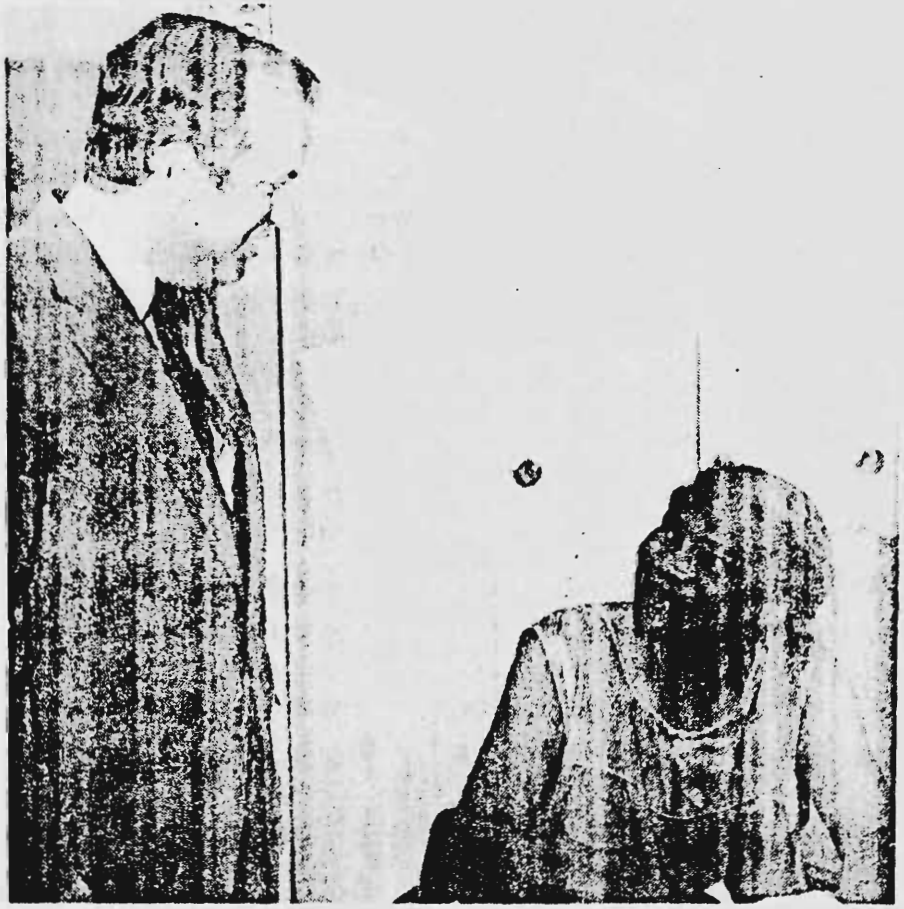
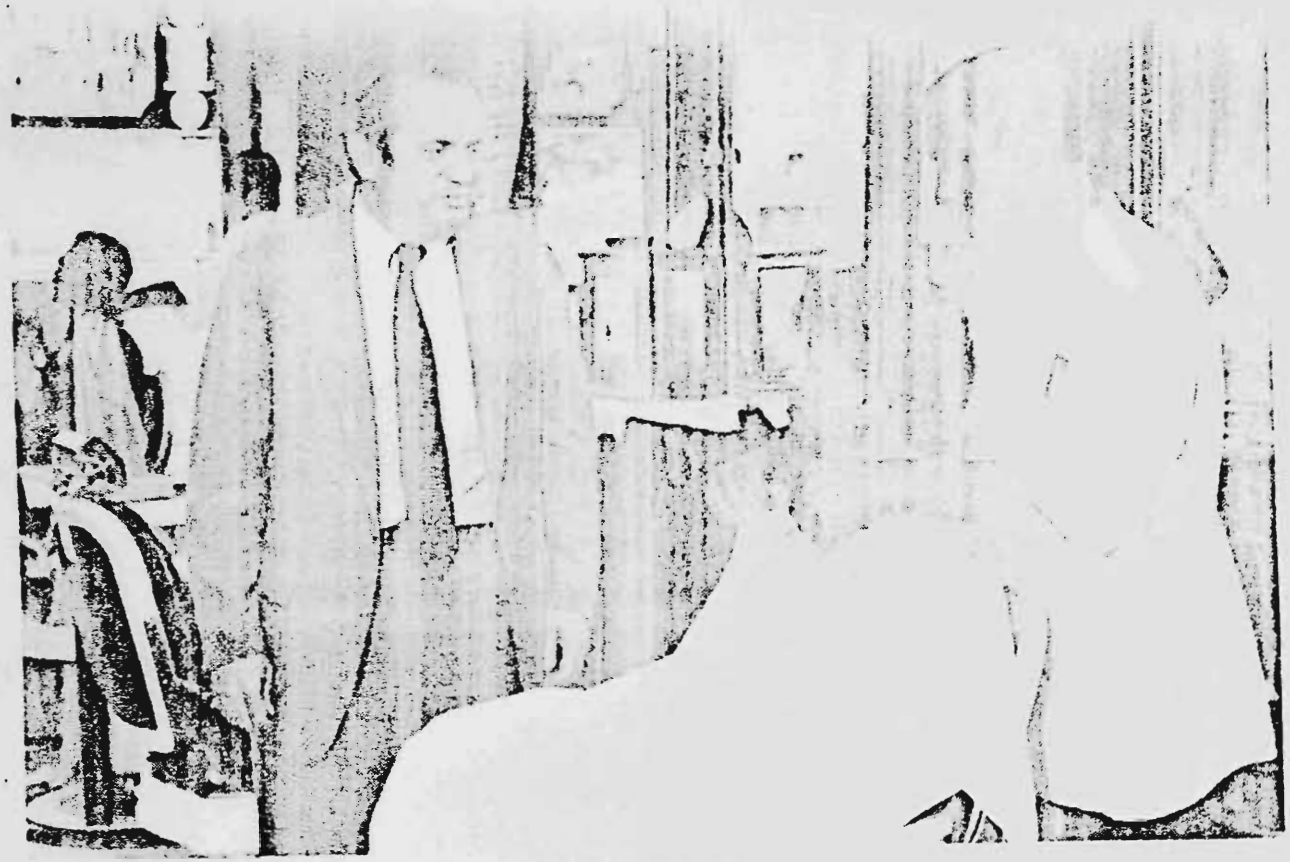
Larry Has Earned The Black Vote

As A Hard Working Congressman:

He Listened



He Cared



He Delivered!

The Black Community Supports

Larry DeNardis

Vote - Nov. 6 - Pull Lever 4B -

For Rides or Information:
562-8437

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FEDERAL ELECTION COMMISSION
1325 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1845

Date Filmed 6/30/86 Camera No. --- 2

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