



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3356

DATE FILMED 11/8/91 CAMERA NO. 2

CAMERAMAN AS

91040374101

06-C 1896

JULES GLAZER
BUSINESS MANAGEMENT

444 S. OCCIDENTAL BLVD., SUITE 421
LOS ANGELES, CA 90057
(213) 384-7030
FAX: (213) 384-5548

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

91 JUL 15 AM 10:31

77-731 LOS ARBOLES
LA QUINTA, CALIFORNIA 92253
(619) 564-4972

July 1, 1991

91 JUL 16 AM 11:14

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE SERVICES BRANCH

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

MUR
3356

Dear Mr. Noble:

We wish to file a complaint with the Federal Election Commission under provision 2 U.S.C. Section 437g(a)(1) of the Federal Election Campaign Act against the Salomon for Congress Committee, the principal campaign committee for Jim Salomon, a Republican candidate for Congress from the 23rd Congressional District of California in the 1990 election cycle.

It appears from the public records at the Federal Election Commission that certain individuals contributed excessive contributions to the Salomon for Congress Committee in clear violation of 2 U.S.C. Section 441a(a)(1)(A) which governs the individual contribution limitations. The individuals and the dates of their contributions are as follows:

Len Fisch of 922 Santee Street, Los Angeles, California 90015, who contributed \$2,000 on December 27, 1989, and \$1,000 on August 6, 1990;

Alexander Cappello of 1888 Century Park East, Los Angeles, California 90067, who contributed \$2,000 on December 29, 1989, and \$350 on October 30, 1990;

Jack Salzberg of 9350 Civic Center Drive, Beverly Hills, California 90210, who contributed \$2,000 on November 7, 1989, in two \$1,000 contributions and \$1,000 on November 5, 1990.

If you need additional information, I can be reached at 213/384-7030.

Signed and sworn on this 9th day of July 1991.



Julius Glazer
Julius Glazer
Treasurer
Beilenson Campaign Committee

91040374102



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 22, 1991

Julius Glazer
444 S. Occidental Blvd., Suite 421
Los Angeles, CA 90057

RE: MUR 3356

Dear Mr. Glazer:

This letter acknowledges receipt on July 16, 1991, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by the Salomon for Congress Committee, Len Fisch, Alexander Cappello, and Jack Salzberg. The respondents will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3356. Please refer to this number in all future correspondence. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

If you have any questions, please contact Retha Dixon, Docket Chief, at (202) 376-3110.

Sincerely,

Lawrence M. Noble
General Counsel

By: Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

91040374103



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 22, 1991

**Saloman for Congress Committee
Cary Davidson, Treasurer
146 Spalding Drive
Beverly Hills, CA 90212**

RE: MUR 3356

Dear Mr. Davidson:

The Federal Election Commission received a complaint which alleges that the Saloman for Congress Committee and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3356. 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 this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

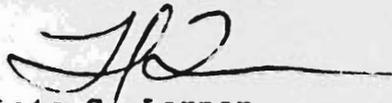
This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

21040374104

If you have any questions, please contact Mark Allen, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

cc: Jim Salomon

91040874105



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 22, 1991

Len Fisch
922 Santee Street
Los Angeles, CA 90015

RE: MUR 3356

Dear Mr. Fisch:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3356. 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 you in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

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

21040374106

If you have any questions, please contact Mark Allen, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

91040374107



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1991

Alexander Cappello
1888 Century Park East
Los Angeles, CA 90067

RE: MUR 3356

Dear Mr. Cappello:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3356. 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 you in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

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

91040374108

If you have any questions, please contact Mark Allen, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

91040374109



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1991

Jack Salzberg
9350 Civic Center Drive
Beverly Hills, CA 90210

RE: MUR 3356

Dear Mr. Salzberg:

The Federal Election Commission received a complaint which alleges that you may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3356. 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 you in this matter. 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. Your response, which should be addressed to the General Counsel's Office, 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.

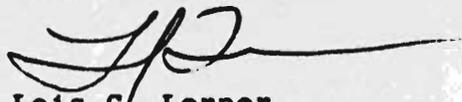
This matter will remain confidential in accordance with 2 U.S.C. 55 437g(a)(4)(B) and 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

91040374110

If you have any questions, please contact Mark Allen, the attorney assigned to this matter, at (202) 376-5690. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Lawrence M. Noble
General Counsel



By: Lois G. Lerner
Associate General Counsel

Enclosures

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

91040374111

707 N. Hillcrest Road
Beverly Hills, CA 90210

Jack I. Salzberg
9350 Civic Center Drive
Beverly Hills, California 90210
(213) 274-0296

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM

91 AUG -9 AM 11:05

MUR 3354

August 5, 1991

91 AUG -9 PM 3:38

RECEIVED
FEDERAL ELECTION COMMISSION

Ms. Lois G. Lerner
Associate General Counsel
FEDERAL ELECTION COMMISSION
999 E Street Northwest
Washington, D.C. 20463

Dear Ms. Lerner,

I acknowledge receipt of your letter dated July 22, 1991. I did not respond earlier because I have just returned from a business trip to Europe.

In response to the complaint that you have received, please be informed that the \$2,000 donated to the campaign of Mr. Jim Salomon is from a joint account that Mrs. Salzberg is a co-signer on. The campaign contribution was for \$1,000 on her behalf and \$1,000 on my behalf. That contribution was made on November 7, 1989.

Enclosed please find an affidavit signed by Mrs. Salzberg confirming that \$1,000 was given on her behalf. The Campaign Committee of Salomon for Congress was informed that the \$2,000 check represented a contribution from the undersigned for \$1,000 and a contribution from Mrs. Salzberg for \$1,000.

Sincerely yours,

Jack I. Salzberg
Jack I. Salzberg

JIS:lm

cc: Carey Davidson, Treasurer
SALOMON FOR CONGRESS COMMITTEE

91040374112

AFFIDAVIT

Under penalty of perjury, I hereby declare that my husband, Jack I. Salzberg, on November 7, 1989 issued a check for \$2,000 to the Campaign of Mr. Jim Salomon of which \$1,000 was a contribution made on my behalf. I am a co-signer on that account.

Anna S. Salzberg
Anna S. Salzberg

Date: 8-5-91

91040874113

06C 2155

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM

REED & DAVIDSON

ATTORNEYS AT LAW

550 SOUTH FLOWER STREET, 7TH FLOOR
LOS ANGELES, CALIFORNIA 90071

TELEPHONE (213) 624-6200

FACSIMILE (213) 623-1692

91 AUG 12 AM 9:40

ORANGE COUNTY OFFICE
3151 AIRWAY AVENUE, SUITE M-1
COSTA MESA, CALIFORNIA 92626
TELEPHONE (714) 641-1688
FACSIMILE (714) 546-1003

DANA W. REED
CARY DAVIDSON
DARRYL R. WOLD
OF COUNSEL

August 7, 1991

Mark Allen, Esq.
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RE: MUR 3356 - Salomon for Congress

Dear Mr. Allen:

This letter responds to the complaint filed against Salomon for Congress and me, as treasurer, as detailed in your July 22, 1991 letter.

The purpose of this letter is to demonstrate that no action should be taken against the committee and me, as treasurer. Mr. Glazer has alleged that individuals contributed sums in excess of limits permitted under the Federal Election Campaign Act. In fact, there were no excessive contributions, but some contributions were mistakenly reported in a fashion that would suggest they were excessive.

The apparent contributions of Len Fisch on December 27, 1989 were drawn on a joint account belonging to Mr. Fisch and his wife. These contributions were simply misreported. One \$1,000 contribution should have been listed as having been received for the primary election from Selma Fisch, whose occupation is a housewife. The other should have been reported as a \$1,000 contribution from Mr. Fisch. Likewise, both Mr. and Mrs. Fisch contributed \$1,000 to the general election on August 6, 1990.

Similarly, the contributions from Jack Salzberg were misdescribed. The November 7, 1989 contributions were \$1,000 each for the primary election and were received from Sima Salzberg, whose occupation is housewife and from Jack Salzberg. On November 5, 1990 Mr. Salzberg contributed \$1,000 to the general election.

The campaign has obtained letters signed by Mrs. Fisch and Mrs. Salzberg that they had designated \$1,000 of the \$2,000 checks to the campaign committee. Copies of those letters are attached.

91040874114

91 AUG 12 AM 10:33

RECEIVED
FEDERAL ELECTION COMMISSION

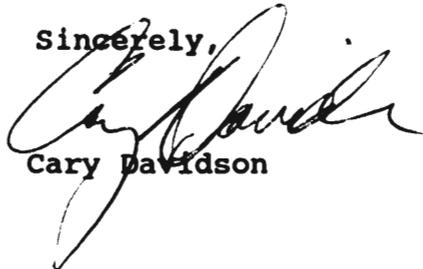
Mark Allen, Esq.
Federal Election Commission
August 7, 1991
Page 2

The \$350 contribution from Alexander Cappello on October 30, 1990 was supposed to have been made by Mr. Cappello's brother, Gerard. Alexander Cappello knew that he had contributed the maximum allowed and believed his brother was making a \$700 contribution for both of them to attend a fundraiser. According to the campaign records, it is unclear whether Gerard issued the \$350 check or whether it was mistakenly issued by Alexander's assistant from Alexander's account.

If there was an error, Gerard will write a \$350 check to the campaign, which the campaign will endorse to Alexander as a refund of his contribution. As you may know, the campaign no longer maintains a checking account so it cannot refund the contribution to Alexander out of its own account should a refund be required. Any receipt of a contribution in excess of the limits was completely inadvertent, and the campaign will do whatever is necessary to rectify the matter.

If you have any questions or we can provide additional information, please do not hesitate to contact us.

Sincerely,



Cary Davidson

CD:jp

Enclosures

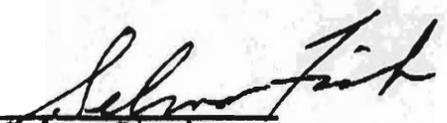
cc: Mr. Jim Salomon

CD10726.4

21040374115

AFFIDAVIT

Under penalty of perjury, I hereby declare that on December 21, 1989, my husband, Len Fisch, issued a check for \$2,000.00 to the Campaign of Mr. Jim Salomon of which \$1,000.00 was a contribution made on my behalf. I am a co-signer on that account.


Selma Fisch

Date: 8-6-91

91040874116

AFFIDAVIT

Under penalty of perjury, I hereby declare that my husband, Jack I. Salsberg, on November 7, 1989 issued a check for \$2,000 to the Campaign of Mr. Jim Salomon of which \$1,000 was a contribution made on my behalf. I am a co-signer on that account.

Anna S. Salsberg
Anna S. Salsberg

Date: 8-5-91

91040374157

06C 2177

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM

91 AUG 13 AM 11: 10

Leonard Fisch

922 Santee Street, Los Angeles, California 90015 • Telephone (213) 689-0101 • FAX (213) 689-0102

mur 3356

August 6, 1991

Ms. Lois G. Lerner
Associate General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

91 AUG 13 PM 4: 40

RECEIVED
FEDERAL ELECTION COMMISSION

Dear Ms. Lerner:

I am in receipt of your letter dated July 22, 1991.

Please be advised that the \$2,000.00 donated to the campaign of Mr. Jim Salomon is from a joint account of which Mrs. Selma Fisch is a co-signer. The campaign contribution was for \$1,000.00 on my wife's behalf and for \$1,000.00 on my behalf. That contribution was made on December 21, 1989.

Enclosed please find an affidavit signed by Mrs. Fisch confirming that \$1,000.00 was given on her behalf. The Campaign Committee of Salomon for Congress was informed that the \$2,000.00 check represented a contribution from Mrs. Fisch for \$1,000.00 and an additional contribution from me for \$1,000.00.

Yours truly,

Len Fisch

LF/rjr

cc: Carey Davidson, Treasurer
SALOMON FOR CONGRESS COMMITTEE

21040374118

AFFIDAVIT

Under penalty of perjury, I hereby declare that on December 21, 1989, my husband, Len Fisch, issued a check for \$2,000.00 to the Campaign of Mr. Jim Salomon of which \$1,000.00 was a contribution made on my behalf. I am a co-signer on that account.


Selma Fisch

Date: 8-6-91

91040874119

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

FIRST GENERAL COUNSEL'S REPORT

MUR # 3356
DATE COMPLAINT RECEIVED
BY OGC 7-16-91
DATE OF NOTIFICATION TO
RESPONDENTS 7-22-91
STAFF MEMBER Mark Allen

COMPLAINANT: Julius Glazer

RESPONDENTS: Salomon for Congress Committee and Cary Davidson,
as treasurer
Alexander Cappello
Len Fisch
Jack Salzberg

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: disclosure reports

FEDERAL AGENCIES CHECKED: none

I. GENERATION OF MATTER

The Office of the General Counsel received a complaint on July 16, 1991 from Julius Glazer. The complaint asserts that three individuals, Alexander Cappello, Len Fisch, and Jack Salzberg, made excessive contributions to the Salomon for Congress Committee and Cary Davidson, as treasurer, ("the Committee") during the 1990 election cycle.

II. FACTUAL AND LEGAL ANALYSIS

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that no person shall make contributions to any candidate and his or her authorized political committees with respect to an election which, in the aggregate, exceed \$1,000.

91040874120

2 U.S.C. § 441a(a)(1)(A). In addition, no committee shall knowingly accept any contribution in violation of this provision.

2 U.S.C. § 441a(f). Finally, the Commission's regulations provide that any contribution made by more than one person shall include the signature of each contributor on the check or in a separate writing. 11 C.F.R. § 110.1(k)(1).

The complaint alleges that three individuals made excessive contributions to the Salomon Committee during the 1990 election cycle. The public record bears out such allegations, and the contributions of the three individuals are listed below.

<u>contributor</u>	<u>amount</u>	<u>date</u>	<u>election</u>	<u>excessive</u>
Cappello, A.	\$2,000 350	12-29-89 10-30-90	primary & general general	\$ 350
Fisch, L.	\$2,000 1,000	12-27-89 8-06-90	primary & general general	\$1,000
Salzberg, J.	\$2,000 1,000	11-07-89 11-05-90	primary & general general	\$1,000

In their responses to the complaint, both Len Fisch and Jack Salzberg state that their \$2,000 contributions, dated December 27, 1989 and November 7, 1989, respectively, were intended to be split between themselves and their spouses (Attachment 1). Both responses include statements from the spouses to this effect and that they are cosigners on the accounts on which the contribution checks were drawn.

While this circumstance may mitigate the excessive nature of the contributions, the fact remains that Fisch and Salzberg each made excessive contributions to the Committee. Neither respondent nor the Committee stated in its response that the contribution

91040374121

checks themselves or any other writing showed the joint nature of the contributions. See 11 C.F.R. § 110.1(k)(1).

The third contributor-respondent, Alexander Cappello, has not responded to the complaint, but the Committee's response states that Alexander Cappello's \$350 contribution on October 30, 1990, was supposed to have been made by Cappello's brother (Attachment 1, page 6). The response states that it is unclear whether Cappello or his brother made the \$350 contribution.

In the present matter, Len Fisch and Jack Salzberg each made contributions \$1,000 in excess of their limits, and Cappello's contribution is excessive by \$350. Therefore, this Office recommends that the Commission find reason to believe that Len Fisch, Jack Salzberg, and Alexander Cappello violated 2 U.S.C. § 441a(a)(1)(A), but take no further action.

The Committee has attempted to terminate, but cannot do so due to its outstanding debt. In view of these circumstances and the modest amount of the total excessives, this Office suggests that further pursuit of the Committee may not be

91040374122

the best use of the Commission's scarce resources. Therefore, this Office recommends that the Commission find reason to believe that Salomon for Congress Committee and Cary Davidson, as treasurer, violated 2 U.S.C. § 441a(f), but exercise its prosecutorial discretion and take no further action.

III. RECOMMENDATIONS

1. Find reason to believe that Len Fisch, Jack Salzberg, and Alexander Cappello violated 2 U.S.C. § 441a(a)(1)(A), but take no further action.
2. Find reason to believe that Salomon for Congress Committee and Cary Davidson, as treasurer, violated 2 U.S.C. § 441a(f), but take no further action.
3. Close the file.
4. Approve the appropriate letters.

Lawrence M. Noble
General Counsel

10/3/91
Date

BY: Lois G. Lerner
Associate General Counsel

Attachments

1. Responses to the complaint (3)

91040374123

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Salomon for Congress Committee) MUR 3356
and Cary Davidson, as treasurer;)
Alexander Cappello;)
Len Fisch;)
Jack Salzberg.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 8, 1991, the Commission decided by a vote of 5-0 to take the following actions in MUR 3356:

1. Find reason to believe that Len Fisch, Jack Salzberg, and Alexander Cappello violated 2 U.S.C. § 441a(a)(1)(A), but take no further action.
2. Find reason to believe that Salomon for Congress Committee and Cary Davidson, as treasurer, violated 2 U.S.C. § 441a(f), but take no further action.
3. Close the file.

(Continued)

91040874124

4. Approve the appropriate letters, as recommended in the General Counsel's Report dated October 3, 1991.

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

Attest:

10-9-91

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Thurs., Oct. 3, 1991 2:42 p.m.
Circulated to the Commission: Fri., Oct. 4, 1991 12:00 p.m.
Deadline for vote: Tues., Oct. 8, 1991 4:00 p.m.

dr

91040874125



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1991

CLOSED

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Julius Glazer
444 S. Occidental Blvd.
Suite 421
Los Angeles, CA 90057

RE: MUR 3356

Dear Mr. Glazer:

This is in reference to the complaint you filed with the Federal Election Commission on July 16, 1991, concerning contributions to the Salomon for Congress Committee during the 1990 election cycle.

Based on that complaint, on October 8, 1991, the Commission found that there was reason to believe that Len Fisch, Jack Salzberg, and Alexander Cappello violated 2 U.S.C. § 441a(a)(1)(A), and that Salomon for Congress Committee and Cary Davidson, as treasurer, violated 2 U.S.C. § 441a(f). Also on that date, however, in considering the circumstances of this matter, the Commission determined to take no further action against Len Fisch, Jack Salzberg, Alexander Cappello, Salomon for Congress Committee and Cary Davidson, as treasurer, and closed the file in this matter. This matter will become part of the public record within 30 days. The Federal Election Campaign Act of 1971, as amended ("the Act"), allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Enclosed is a copy of the General Counsel's Report which recommended that the Commission take no further action and close the file in this matter. You will notice that on page three text has been deleted. This text relates to the Commission's internal policies and procedures and cannot be made public.

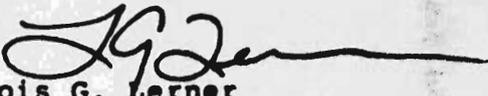
91040874126

Julius Glazer
Page 2

If you have any questions, please contact Mark Allen, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

91040374127



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1991

Cary Davidson, Treasurer
Salomon for Congress Committee
Reed & Davidson
550 South Flower Street
7th Floor
Los Angeles, CA 90071

RE: MUR 3356

Dear Mr. Davidson:

On October 8, 1991, the Federal Election Commission found reason to believe that the Salomon for Congress Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 441a(f), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The General Counsel's Report, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that accepting contributions of greater than \$1,000 from individuals in connection with any election appears to be a violation of 2 U.S.C. § 441a(f). You should take immediate steps to insure that this activity does not occur in the future.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

If you have any questions, please direct them to Mark Allen, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosure
General Counsel's Report

91040874128



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 16, 1991

Len Fisch
922 Santee Street
Los Angeles, CA 90015

RE: MUR 3356

Dear Mr. Fisch:

On October 8, 1991, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The General Counsel's Report, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that making contributions that total more than \$1,000 in connection with an election appears to be a violation of 2 U.S.C. § 441a(a)(1)(A). You should take immediate steps to insure that this activity does not occur in the future.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

If you have any questions, please direct them to Mark Allen, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosure
General Counsel's Report

91040374129



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 16, 1991

Alexander Cappello
1888 Century Park East
Los Angeles, CA 90067

RE: MUR 3356

Dear Mr. Cappello:

On October 8, 1991, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The General Counsel's Report, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that making contributions that total more than \$1,000 in connection with an election appears to be a violation of 2 U.S.C. § 441a(a)(1)(A). You should take immediate steps to insure that this activity does not occur in the future.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

If you have any questions, please direct them to Mark Allen, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosure
General Counsel's Report

91040874130



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 16, 1991

Jack Salzberg
9350 Civic Center Drive
Beverly Hills, CA 90210

RE: MUR 3356

Dear Mr. Salzberg:

On October 8, 1991, the Federal Election Commission found reason to believe that you violated 2 U.S.C. § 441a(a)(1)(A), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action and closed its file. The General Counsel's Report, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that making contributions that total more than \$1,000 in connection with an election appears to be a violation of 2 U.S.C. § 441a(a)(1)(A). You should take immediate steps to insure that this activity does not occur in the future.

The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

If you have any questions, please direct them to Mark Allen, the attorney assigned to this matter, at (202) 219-3400.

Sincerely,

Joan D. Aikens

Joan D. Aikens
Vice Chairman

Enclosure
General Counsel's Report

91040374131



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3356

DATE FILMED 11/2/91 CAMERA NO. 2

CAMERAMAN AS

91040874132