



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20461

THIS IS THE BEGINNING OF MUR # 3553

DATE FILMED 10/28/93 CAMERA NO. 2

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A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6600

July 1, 1992

MUR 3553

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUL - 1 PM 3:50

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

Dear Commissioners:

The Democratic Congressional Campaign Committee ("DCCC") files this complaint charging violations of the Federal Election Campaign Act of 1971, as amended ("FECA" or "the Act"), 2 U.S.C. §§ 431 et seq., and related Federal Election Commission ("FEC") regulations, 11 C.F.R. §§ 100.1 et seq., by Tom Scott and his principal campaign committee, Scott for Congress ("the Committee") (referred to collectively hereafter as "Respondents").

Respondents have violated the Act by accepting excessive contributions and by failing to file accurate reports of receipts and disbursements. Reports from 1990 to the present day have been filed with information that is inaccurate and incomplete, despite requests from the FEC for clarification and additional information.

The FEC must act to bring Respondents into compliance. The reports filed show a pattern of failing to adequately report to the public the campaign activities of Mr. Scott. This pattern cannot be attributed simply to "sloppy" reporting or commonplace administrative error. The FEC should take all necessary steps to correct this situation as soon as possible, including, if necessary, conducting an audit of the books and records of the Committee, to ensure that the activities of the Committee have been conducted in complete compliance with the FECA and the FEC regulations and to ensure that the public record accurately reflects the activities of the Committee.

Evidence of Violations

Even a brief review of the public records filed by the Committee reveals the extent of the problems here:

1. Excessive Contributions. The Committee has accepted, and not refunded in a timely matter, contributions that exceed the lawful limits provided in the Act.

[04031-0034/DA921760.070]

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a. English First Political Victory Fund

On June 29, 1990, the Committee reported receiving a \$1,000 convention contribution from this committee. On October 13, 1990, the reports reflect an additional \$3,000 reported for the general election. On October 31, 1990, an additional \$1,000 was received for the general election. While the Committee had received \$5,000 from this committee, the aggregate year-to-date reported by the Committee was \$4,000.

On December 6, the Committee reported a refund to the committee of \$1,000. On December 11, the FEC sent a request for additional information to the Committee notifying it that English First did not qualify as a multicandidate committee. It could not, therefore, contribute in excess of \$1,000 to any election.

Mr. Scott did not refund the excessive contributions. Rather, on December 13, 1990 and April 19, 1991, he accepted additional \$1,000 contributions from this committee, one designated for the general election, and the second for debt retirement (but did not specify which election debt it was designated to retire). After two additional warning letters from the Commission notifying the Committee that this committee did not qualify for contributions over \$1,000, Mr. Scott finally refunded an additional \$1,000 on June 12, 1991.

This still left Mr. Scott with an excessive contribution. He received a total of \$7,000 from the committee, and refunded only \$2,000. Contributions totalling \$4,000 were contributed toward the general election alone, where he was legally allowed to accept only \$1,000. There is no evidence on his reports that any amounts were redesignated by the contributor for other elections.

b. U.S. Security PAC

The same pattern emerges with contributions from this PAC. On October 27, 1990, Mr. Scott accepted \$1,800 from this committee and reported it as a general election contribution. On January 2, 1991, the FEC notified Mr. Scott that the committee did not qualify as a multicandidate committee and that the contribution was excessive. A follow-up letter from the Commission was also ignored. The

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excessive contribution has never been refunded; nor is there any evidence that the contribution had been redesignated within 60 days for debt retirement.

c. GOP 3

Once again, Mr. Scott accepted excessive contributions from this committee and failed to refund the excessive amounts despite repeated notices from the Commission. An original \$3,000 contribution was received in September 1991 and reported as general election related. An additional \$650, also for the general election, was received in October. The Commission notified the Committee on December 11 that the contribution was illegal. Again, there has been no refund of the excessive contribution.

d. Other Excessive Contributions

The Committee received over \$20,000 during 1990 from various state and local party committees in Connecticut. All party committees in the same state are presumed to be affiliated and, therefore, to share a single contribution limit to any candidate. Assuming the Republican State Committee qualifies as a multicandidate committee, all party committees could contribute up to an aggregate of \$5,000 per election to Mr. Scott's election. Even assuming three elections (convention, primary, and general), the parties exceeded the limit. There has been no refund.

In addition, through the reports, Mr. Scott failed to accurately compute and report the aggregate year-to-date total of contributions. As noted above, the reports reflect understated year-to-dates. For other contributors there is no year-to-date at all. A careful review of these contributions may also reveal excessive amounts donated to Mr. Scott.

2. Inadequate Filings. The Committee has filed reports that do not comply with the legal requirements for clear, full disclosure of the activities of a candidate's campaign activities. Vital, required information is inaccurately or inadequately disclosed. The public record reflects notices from the FEC about deficiencies on reports filed by the Committee. These deficiencies are not insignificant. A partial list of the problems reflected on the reports includes:

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- Inadequate disclosure of contributor information and no clear indication of any best efforts to obtain the missing information. Nearly one-quarter of the occupation and employer information is missing altogether. Contributor information that does appear is often vague and uninformative. Occupation information is listed without any employer and with such inadequate descriptions as "physician," "investor," "real estate," "publisher."
- The failure to provide separate schedules for different types of receipts and disbursements. Contribution schedules lump together individual contributors, party committees, refunds, candidate loans. Disbursement schedules are similarly jumbled, showing not only operating schedules, but also contributions made by the Committee, loan repayments, refunds, etc.
- Inconsistent reporting of candidate loans or contributions. One contribution/loan appears and disappears on the schedules and summary pages of several reports and is cited in various places as both a contribution and a loan.
- Debts are improperly disclosed and are not carried accurately from report to report. On one report, for example, debts are listed as outstanding at the beginning of the reporting period, but were not disclosed on the previous report. On another report, debts are listed as incurred during the reporting period, but had been listed on the previous report as incurred during that period.
- In-kind contributions are not included in aggregate year-to-date totals for the contributors. The contributions also do not disclose the actual vendor who received payment for the in-kind contribution, making it impossible to determine the actual purpose of the disbursement.
- Contributions are not redesignated when they exceed the limits for a particular election. In addition to the PAC contributions discussed above, individual contributors would appear to have exceeded the per

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election limit. Mr. William L. Hanley, for example, gave \$1,000 for the primary on March 26, 1990. On August 21, 1990, he gave another \$1,000, also designated for the primary. The contribution exceeds the primary election limit, but was never redesignated for another election.

The initial filing of these reports with these problems is of sufficient significance, standing alone, to warrant Commission investigation. But a review of the documents in the public record would indicate that Respondents have repeatedly failed to respond to the Commission's notifications of these deficiencies and requests for corrections or additional information.

Conclusion

Respondents are not new to the FECA and the reporting requirements, having run a federal campaign in 1990. Nor did Respondents run a small campaign which, arguably was insufficiently staffed. During the 1990 campaign, the Committee raised over \$300,000, more than enough to hire a staff member to attend to its obligation to publicly disclose its activities.

The failure to respond to the Commission and to correct the errors called to Respondents' attention, as well as the apparent lack of effort to improve the Committee's reporting, results in a confused, inaccurate and incomplete public record of Scott's campaign finances. This does a disservice to the voters of Connecticut who must rely on these reports for information about the campaign activities of Respondents. It also flies in the face of one of the most important principles of campaign finance reform: public disclosure.

On the basis of the foregoing, DCCC asks that the Commission take the following actions:

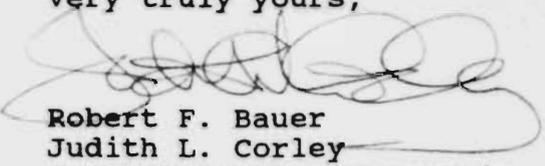
1. Conduct a prompt investigation, including, as necessary, an audit, of the charges made in this complaint;
2. Enter into a prompt conciliation with the Respondents to remedy the violations alleged in this complaint and, more importantly, to ensure that no further violations occur; and

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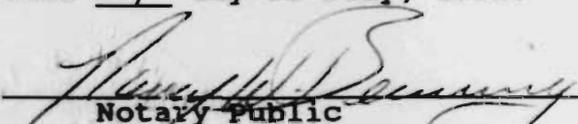
Federal Election Commission
July 1, 1992
Page 6

3. Impose any and all penalties appropriate for the violations found.

Very truly yours,


Robert F. Bauer
Judith L. Corley
Counsel to the Democratic
Congressional Campaign Committee

Subscribed and sworn to before me
this 1st day of July, 1992.


Notary Public

My commission expires May 31, 1995.

NANCY W. BENNING
Notary Public, Washington, D.C.

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUL - 1 PM 3:50



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 7, 1992

Judith Corley, Esq.
Perkins Coie
607 Fourteenth Street, NW
Washington, DC 20005-2011

RE: MUR 3553

Dear Ms. Corley:

This letter acknowledges receipt on July 1, 1992, of your complaint on behalf of the Democratic Congressional Campaign Committee alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Tom Scott, Tom Scott for Congress, and John D. Marvell, as treasurer, Scott for Congress, and Marc Zanghi, as treasurer, English First Political Victory Fund, and Frank McGlynn, as treasurer, U.S. Security PAC, Inc., and Curtin Winsor, as treasurer, Connecticut Third Congressional District Republicans, and Benjamin S. Proto Jr., as treasurer, and the Connecticut Republican Federal Campaign Committee and Robert Norman, as treasurer. 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 3553. 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.

Sincerely,

Jonathan A. Bernstein
Assistant General Counsel

Enclosure
Procedures

93040984175



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 7, 1992

Tom Scott
105 Hawley Avenue
Milford, CT 06460

RE: MUR 3553

Dear Mr. Scott:

The Federal Election Commission received a complaint which indicates 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 3553. 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.

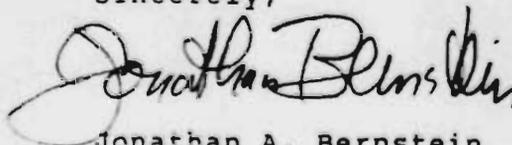
This matter will remain confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) unless you notify the Commission in writing that you wish the matter to be made public. If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed 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.

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Tom Scott
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein
Assistant General Counsel

Enclosures

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

93040984177



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 7, 1992

Tom Scott for Congress
John D. Marvell, Treasurer
22 Broad Street
Milford, CT 06460

RE: MUR 3553

Dear Mr. Marvell:

The Federal Election Commission received a complaint which indicates that Tom Scott 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 3553. 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.

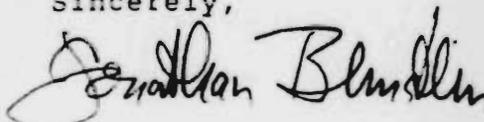
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93040984178

Tom Scott for Congress
John D. Marvell, Treasurer
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein
Assistant General Counsel

Enclosures

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

93040984179



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

July 7, 1992

Scott for Congress
Marc Zanghi, Treasurer
P.O. Box 5106
Milford, CT 60460

RE: MUR 3553

Dear Mr. Zanghi:

The Federal Election Commission received a complaint which indicates that Scott 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 3553. 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.

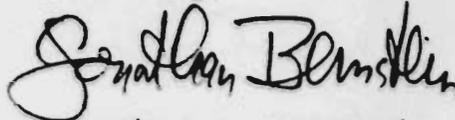
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Scott for Congress
Marc Zanghi, Treasurer
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein
Assistant General Counsel

Enclosures

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

93040984181



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 7, 1992

English First Political Victory Fund
Frank McGlynn, Treasurer
8001 Forbes Place, Suite 102
Springfield, VA 22151

RE: MUR 3553

Dear Mr. McGlynn:

The Federal Election Commission received a complaint which indicates that the English First Political Victory Fund ("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 3553. 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.

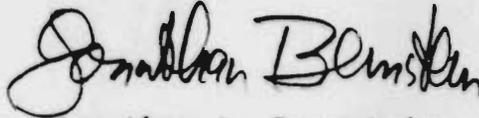
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English First Political Victory Fund
Frank McGlynn, Treasurer
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein
Assistant General Counsel

Enclosures

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

93040984183



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

July 7, 1992

U.S. Security PAC, Inc.
Curtin Winsor, Treasurer
50 E Street, SE
Suite 301
Washington, DC 20003

RE: MUR 3553

Dear Mr. Curtin:

The Federal Election Commission received a complaint which indicates that U.S. Security PAC, Inc. ("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 3553. 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.

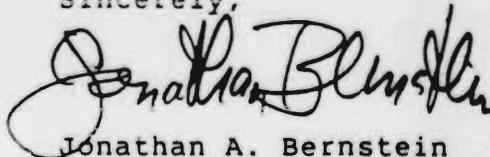
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U.S. Security PAC, Inc.
Curtin Winsor, Treasurer
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein
Assistant General Counsel

Enclosures

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

93040984185



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 7, 1992

Connecticut Third Congressional
District Republicans
Benjamin S. Proto Jr., Treasurer
1877 Broadbridge Avenue
Stratford, CT. 06497

RE: MUR 3553

Dear Mr. Proto:

The Federal Election Commission received a complaint which indicates that Connecticut Third Congressional District Republicans ("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 3553. 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.

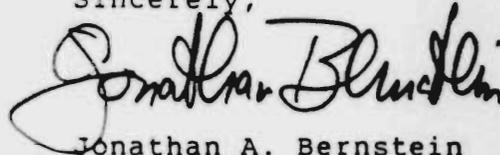
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Connecticut Third Congressional
District Republicans
Benjamin S. Proto Jr., Treasurer
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein
Assistant General Counsel

Enclosures

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

93040984187



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 7, 1991

Connecticut Republican Federal
Campaign Committee
Robert Norman, Treasurer
78 Oak Street
Hartford, CT. 06106

RE: MUR 3553

Dear Mr. Norman:

The Federal Election Commission received a complaint which indicates that Connecticut Republican Federal Campaign Committee ("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 3553. 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.

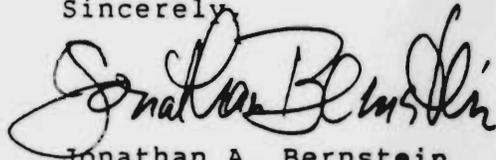
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93040984188

Connecticut Republican Federal
Campaign Committee
Robert Norman, Treasurer
Page 2

If you have any questions, please contact Richard M. Zanfardino, the staff member assigned to this matter, at (202) 219-3690. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,



Jonathan A. Bernstein
Assistant General Counsel

Enclosures

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

93040984189

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3553

NAME OF COUNSEL: James Altham

ADDRESS: 60 Allene Dr.

Hamden, Ct. 06517

TELEPHONE: 203-288-9424

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
WASHINGTON, D.C. 20543

92 JUL 16 PM 5:09

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

7/16/92
Date

Thomas Scott
Signature

RESPONDENT'S NAME: Thomas Scott

ADDRESS: P.O. Box 5106

Milford, Ct. 06460

HOME PHONE: _____

BUSINESS PHONE: 203-878-1162

93040984190

STATEMENT OF DESIGNATION OF COUNSEL

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUL 17 AM 9:28

NR 3553

NAME OF COUNSEL: James Altham

ADDRESS: 60 Allene Dr.

Hamden, Ct. 06517

TELEPHONE: 203-288-9424

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

7/16/92
Date

Marc Zanghi
Signature

RESPONDENT'S NAME: Marc Zanghi

ADDRESS: P.O. Box 5106

Milford, Ct. 06460

HOME PHONE: _____

BUSINESS PHONE: 203-874-9031

93040984191

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3553

NAME OF COUNSEL: James Altham

ADDRESS: 60 Allene Dr.
Hamden, Ct. 06517

TELEPHONE: 203-288-9424

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUL 17 AM 9:25

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

7/16/92
Date

John J. Marvell
Signature

RESPONDENT'S NAME: John Marvell

ADDRESS: 22 Broad St.
Milford, Ct. 06460

HOME PHONE: _____

BUSINESS PHONE: 203-878-1162

93040984192

**JAMES F. ALTHAN, JR.
ATTORNEY AND COUNSELOR AT LAW
60 ALIEN DRIVE
HAMDEN, CT 06517
(203) 288-9424**

July 22, 1992

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

Attention: Richard M. Zenfardino, Esq.
General Counsel's Office

Re: MUR 3553

Complainants: Robert F. Bauer, Esq.
Judith L. Corey, Esq.
Counsel to the Democratic Congressional
Campaign Committee

Respondent: Tom Scott
Tom Scott for Congress Committee (CT-3) and
John Marvell, Its Treasurer

Date of Complaint: 7/1/92 (Received by FEC: 7/1/92)

Date of FEC Notification to Respondent: 7/7/92

Date of Receipt by Respondents: 7/10/92 (est.)

Dear Mr. Zenfardino,

Please be advised that this office represents the above-named respondents in MUR 3553. Enclosed please find a duly executed Statement of Designation of Counsel reflecting that representation. Said statements were previously faxed to your office on or about 7/16/92.

We are in receipt of the following documents relevant to MUR 3553:

- a) A copy of the 6-page complaint filed by the Democratic Congressional Campaign Committee acting through its Counsel Robert F. Bauer, Esq. and Judith L. Corey, Esq. dated July 1, 1992, and apparently received by the FEC on July 1, 1992;
- b) A form entitled "Statement of Designation of Counsel;
- c) A two page letter directed to Tom Scott for Congress to the attention of Mr. John D. Marvell from FEC Asst. General Counsel Jonathan A. Bernstein.

You have indicated to me in a telephone conversation regarding this matter that, despite the requirement of Mr. Bernstein's letter that a reply be forwarded by July 22, 1992,

The following is the response of the above-named respondents to the complaint.

93040984193

92 JUL 29 PM 12:25
RECEIVED
COMMUNICATIONS SECTION

RESPONSE TO THE COMPLAINT:

1. *The Respondents Tom Scott for Congress Committee and its Treasurer John D. Marvell deny that there is reason to believe that they have committed any violation as alleged in the complaint filed by the Complainant. The Respondent Tom Scott denies that there is reason to believe that he has committed any such violation individually as regards activities of either committee or its treasurer.*
2. For the purpose of clarity, each of said respondents would raise to the attention of the Commission the fact that the complaint as stated in complainants' letter relates solely to activities attributed to another committee---Scott for Congress---which was Tom Scott's principal campaign committee for the 1990 election (see the first paragraph of complainants' letter and each and every substantive allegation).
3. The commission has nonetheless notified Mr. Scott, "Tom Scott for Congress"---his 1992 principal campaign committee---and his 1992 treasurer John D. Marvell, although there are no allegations whatsoever as to 1992 election activity.
4. To the extent that the complainants attempt to implicate Tom Scott personally by speaking of him as though he were the committee or its treasurer, i.e.:

Page 2, Paragraph 3: "Mr. Scott did not refund.;"
"Mr. Scott finally refunded..."

Page 2, Paragraph 4: "This still left Mr. Scott with...He received a total of...where he was legally allowed to accept only...There is no evidence on his reports..."

Page 2, Paragraph 5: "...Mr. Scott accepted..."

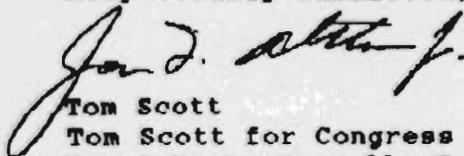
Page 3, Paragraph 2: "Once again, Mr. Scott accepted..."

Page 3, Paragraph 4: "...Mr. Scott failed to accurately compute..." "...excessive amounts donated to Mr. Scott."

complainants have done what may charitably be described as a very sloppy job of making allegations in light of their professional backgrounds. One is actually compelled to conclude that, motivated to use the FEC for political advantage, they have intentionally filed a complaint worded and designed in such fashion as to mislead the press and others less sophisticated and knowledgeable as to FEC regulations than FEC staff to believe that they have filed a substantive complaint against Mr. Scott. *They have made not a single allegation of any wrongdoing by Mr. Scott.*

5. The allegations of the July 1, 1992 complaint relate solely to DCCC claims as to activities of "Scott for Congress"--Tom Scott's principal campaign committee for the 1990 election and its treasurer(s) but not the candidate, Tom Scott, whom I believe to have no independent reporting obligation of his own.
6. Tom Scott has, pursuant to law, created a principal campaign committee "Scott for Congress" for the 1990 campaign and designated Miss Doraen Rymkiewicz as its Treasurer, and later designated Marc Zanghi as her successor in that position. Tom Scott has, pursuant to law, created a principal campaign committee "Tom Scott for Congress" for the 1992 campaign and designated John D. Marvell as its Treasurer. Consequently, to the extent that the complaint MUR 3553 by counsel for the Democratic Congressional Campaign Committee names Tom Scott individually as a respondent, it is groundless and no reasonable ground for the complaint should be found against him by the FEC.
7. **CONCLUSION** The following conclusions should be reached by the FEC regarding Tom Scott for Congress, John D. Marvell, its Treasurer, and Tom Scott individually:
- a) No violation has occurred attributable to any one of said three respondents;
 - b) Tom Scott has had no personal obligation as to filing such reports, having established a principal campaign committee and having designated a treasurer other than himself, and he is therefore not a proper party Respondent to this complaint and there is no reason to believe that he has violated the act in any way and the complaint as to him should be dismissed with prejudice;
 - c) Tom Scott for Congress is Tom Scott's principal campaign committee for the 1992 election. All allegations of this complaint of July 1, 1992, relate to allegations against a previous committee for a previous campaign. Therefore neither Tom Scott for Congress nor John D. Marvell, its Treasurer, have violated the act in any way alleged in said complaint and said complaint as to each of them should be dismissed with prejudice.

Respectfully submitted,



Tom Scott
Tom Scott for Congress
Mr. John D. Marvell, Treasurer of Tom Scott for Congress
by James F. Altham, Jr., their attorney

**JAMES F. ALTHAM, JR.
ATTORNEY AND COUNSELOR AT LAW
60 ALIKNE DRIVE
HAMDEN, CT 06517
(203) 288-9424**

July 22, 1992

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

Attention: Richard M. Zanfardino, Esq.
General Counsel's Office

Re: MUR 3553

Complainants: Robert F. Bauer, Esq.
Judith L. Corey, Esq.
Counsel to the Democratic Congressional
Campaign Committee

Respondent: Scott for Congress Committee (CT-3) AND
Marc Zanghi, Its Treasurer

Date of Complaint: 7/1/92 (Received by FEC: 7/1/92)

Date of FEC Notification to Respondent: 7/7/92

Date of Receipt by Respondent: 7/10/92 (est.)

Dear Mr. Zanfardino,

Please be advised that this office represents the above-named respondents in MUR 3553. Enclosed please find a duly executed Statement of Designation of Counsel reflecting that representation. Said statements were previously faxed to your office on or about 7/16/92.

We are in receipt of the following documents relevant to MUR 3553:

- a) A copy of the 6-page complaint filed by the Democratic Congressional Campaign Committee acting through its Counsel Robert F. Bauer, Esq. and Judith L. Corey, Esq. dated July 1, 1992, and apparently received by the FEC on July 1, 1992;
- b) A form entitled "Statement of Designation of Counsel;
- c) A two page letter directed to Tom Scott for Congress to the attention of Mr. Marc Zanghi from FEC Asst. General Counsel Jonathan A. Bernstein.

You have indicated to me in a telephone conversation regarding this matter that, despite the requirement of Mr. Bernstein's letter that a reply be forwarded by July 22, 1992.

The following is a preliminary and partial response. I hereby request, at your suggestion, an additional thirty days to complete our response to MUR 3553.

PARTIAL AND PRELIMINARY RESPONSE TO THE COMPLAINT:

1. *The Respondents Scott for Congress Committee and its Treasurer Marc Zanghi expect to deny that there is reason to believe that they have committed any violation as alleged in the complaint filed by the Complainant. Nonetheless, the complaint as to them is very wide-ranging and requires additional time to formulate a well-documented and carefully accurate response. It will be necessary to retrieve and review many documents. Therefore, we are requesting a thirty day extension to do so.*
2. For the purpose of clarity, each of said respondents would raise to the attention of the Commission the fact that the complaint as stated in complainants' letter relates solely to activities attributed to this committee---Scott for Congress---which was Tom Scott's principal campaign committee for the 1990 election (see the first paragraph of complainants' letter and each and every substantive allegation).
3. The commission has nonetheless notified Mr. Scott, "Tom Scott for Congress---his 1992 principal campaign committee---and his 1992 Treasurer John D. Marvell, although there are no allegations whatsoever as to 1992 election activity.
4. To the extent that the complainants attempt to implicate Tom Scott personally by speaking of him as though he were the committee or its treasurer, i.e.:

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"Mr. Scott finally refunded..."

Page 2, Paragraph 4: "This still left Mr. Scott with...He received a total of...where he was legally allowed to accept only...There is no evidence on his reports..."

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Page 3, Paragraph 2: "Once again, Mr. Scott accepted"

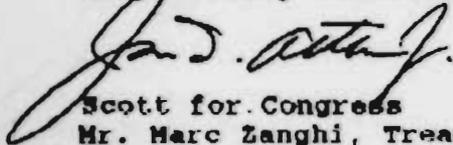
Page 3, Paragraph 4: "...Mr. Scott failed to accurately compute..." "...excessive amounts donated to Mr. Scott."

complainants have done what may charitably be described as a very sloppy job of making allegations in light of their professional backgrounds. One is actually compelled to conclude that, motivated to use the FEC for political advantage, they have intentionally filed a complaint worded and designed in such fashion as to mislead the press and others less sophisticated and knowledgeable as to FEC regulations than FEC staff to believe that they have filed a substantive complaint against Mr. Scott. *They have made not a single allegation of any wrongdoing by Mr. Scott.*

5. The allegations of the July 1, 1992 complaint relate solely to DCCC claims as to activities of "Scott for Congress"--Tom Scott's principal campaign committee for the 1990 election and its treasurer(s) but not the candidate, Tom Scott, whom I believe to have no independent reporting obligation of his own.
6. Tom Scott has, pursuant to law, created a principal campaign committee "Scott for Congress" for the 1990 campaign and designated Miss Doreen Rynkiewicz as its Treasurer, and later designated Marc Zanghi as her successor in that position. Tom Scott has, pursuant to law, created a principal campaign committee "Tom Scott for Congress" for the 1992 campaign and designated John D. Marvell as its Treasurer. *Consequently, to the extent that the complaint MUR 3553 by counsel for the Democratic Congressional Campaign Committee names Tom Scott individually as a respondent, it is groundless and no reasonable ground for the complaint should be found against him by the FEC.*
7. At this point, we disregard the shotgun allegations of the first three paragraphs of the DCCC complaint, which contain no specific charges but the usual broad tarbrush so often used by the complainants' principal and servants.
8. We are establishing communication with the English First Political Victory Fund. Our response will follow.
9. We are establishing communication with U. S. Security PAC. Our response will follow.
10. We are attaching hereto GOP 3's response to the substance of this complaint previously filed by Attorney Benjamin S. Proto, Jr. on or about July 19, 1992. Scott for Congress and Marc Zanghi, its Treasurer, hereby adopt the response of GOP-3 as our own as well. GOP-3 is far better versed in its own internal operations than are we and we have no reason to believe that Mr. Proto's response is inaccurate.
11. As to those items listed under "Inadequate Filings," disregarding DCCC's gratuitous editorializing, we would observe generally that the complainant should have a threshold responsibility to specify each item complained of. The Democratic Congressional Campaign Committee is not a mom-and-pop grocery store lacking in sophistication. By filing very generalized allegations, the complainants place an undue burden on respondents and are engaging in what amounts to an unacceptable "fishing expedition" that is rather analogous to discovery in a civil action. The DCCC behaves like a plaintiff's attorney suing General Motors in a products liability case and propounding interrogatories to the effect of "1. Have you ever been sued? If so, please provide all relevant details as to each and every case." FEC should require the complainants to make specify items.

12. As to "Inadequate Filings," we have begun researching our response, but we also ask some relief in the form of a direction by FEC to complainants to narrow the scope of the complaint to specific items.
13. Finally, as to "Inadequate Filings," we would like to observe that this complaint was filed just short of the second anniversary of a previous complaint by DCCC---MUR 3082---and that it is likely no coincidence that DCCC is in the habit of filing such complaints against those involved in very competitive Scott campaigns every two years at convention time. Coupled with the burdensome broadness and lack of specificity of the allegations, this chronological "coincidence" leads us to believe that DCCC is intentionally using the FEC process to require excessive staff time to be devoted to responding to DCCC fishing expeditions in a circumstance in which the Rosa DeLauro re-election campaign is, as usual, much more lavishly financed and staffed than is Scott's campaign. We feel that this is an abuse of the FEC process by DCCC and should be regarded as such.
14. **CONCLUSION** We will defer recommending conclusions until our final response as to Scott for Congress and Marc Zanghi, its Treasurer.

Respectfully submitted,



Scott for Congress
Mr. Marc Zanghi, Treasurer of Scott for Congress
by James F. Altham, Jr., their attorney

93040984199

BENJAMIN S. PROTO, JR.
ATTORNEY AT LAW
1877 BROADBRIDGE AVENUE
STRATFORD, CONNECTICUT 06497
(203) 378-9595

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FEDERAL ELECTION
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Admitted:
Connecticut
New Hampshire

July 19, 1992

Richard M. Zanfardino
Federal Elections Commission
999 E Street NW
Washington DC 20463

RE: MUR 3553

Dear Mr. Zanfardino:

This letter will serve as the official response of the Connecticut Third Congressional District Republicans a/k/a GOP-3 to the complaint filed by Democratic Congressional Campaign Committee (DCCC) against the Scott for Congress Committee.

The DCCC alleges that the Scott for Congress Committee accepted contributions from GOP-3 in excess of the legal limit. It is GOP-3's contention that it is a multi-candidate committee as set forth in 11 C.F.R. Section 100.5(e)(3).

As you are aware, a multi-candidate committee is a political committee which has met three criteria, namely, it has been in existence at least six (6) months, has received contributions from at least 50 persons and has made contributions to at least five (5) federal candidates.

GOP-3 was formed on June 15 1987 by the filing of a Statement of Organization with the Commission. The Commission requested additional information by letter dated July 1, 1987 and an amended Statement of Organization was filed on August 1, 1987.

GOP-3 filed its first report with the Commission on July 31, 1987. At that time GOP-3 had in excess of fifty (50) contributors. (Copies of contributors checks are available if the Commission so desires.) GOP-3's contributors now total in excess of 300 people.

In 1988 GOP-3 made contributions to two Federal candidate committees, Diette for Congress in the amount of \$300.00 made on May 23, 1988 and Patton for Congress in the amount of \$1000.00 made on June 23, 1988. These contributions appear on the report covering the period from April 1, 1987 to July 15 1987.

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Page 2
Federal Elections Commission
July 19, 1992

During the 1990 election cycle GOP-3 contributed to the following Federal candidate committees: Chase for Congress, \$100.00 on May 7, 1990; Scott for Congress, \$100.00 on May 7, 1990; Patton for Congress (this was a different candidate committee than the 1988 committee) \$100.00 on September 10, 1990; Franks for Congress, \$50.00 on September 10, 1990; Johnson for Congress, \$50.00 on September 10, 1990; Scott for Congress, \$3000.00 on September 10, 1990; and Scott for Congress, \$550 on October 18, 1990. The total contributions made to the Scott for Congress committee by GOP-3 in 1990 was \$3,650.00.

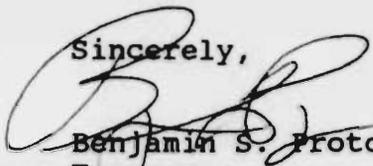
11 C.F.R section 110.2(b) limits the contributions from a multi-candidate committee to any candidate to \$5,000.00 for any election. Clearly, GOP-3's total contributions to the Scott for Congress committee, which included contributions to a convention election, a primary election and a general election, were far below the limitation of \$5,000.00. In fact, GOP-3's total contributions to the Scott for Congress committee, as outlined above totaled \$3650.00.

GOP-3, at the time it made a contribution to Scott for Congress had met all the requirements for status as a multi-candidate committee and as such did not make excessive contributions to the Scott for Congress committee.

Therefore, the DCCC's complaint that GOP-3 contributed to the Scott for Congress committee in excess of the limit as set by law is completely and totally without merit and I therefore request that the Commission dismiss the DCCC's complaint as it applies to GOP-3.

If the Commission requires any further information please contact me at the above address.

Sincerely,



Benjamin S. Proto, Jr.
Treasurer

Certified Mail P 852 250 588
Return Receipt Requested

93040984201



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 30, 1992

James F. Altham, Esq.
60 Allene Dr.
Hamden, CT 06517

RE: MUR 3553
Tom Scott, Tom Scott
for Congress Committee
and John Marvell, as
treasurer, Scott for
Congress Committee and
Marc Zangi, as treasurer

Dear Mr. Altham:

This is in response to your letter dated July 22, 1992, which we received on July 24, 1992, requesting an extension of 30 days to respond to the complaint filed in this matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on August 21, 1992.

If you have any questions, please contact me at (202) 219-3460.

Sincerely,

A handwritten signature in black ink, appearing to read "R. M. Zanfardino".

Richard M. Zanfardino
Staff Member

93040984202

WILLIAM J. OLSON, P.C.

ATTORNEYS AT LAW

8180 GREENSBORO DRIVE, SUITE 1070
MCLEAN, VIRGINIA 22102-0800

TELEPHONE (703) 388-8070

FAX (703) 388-8088

WILLIAM J. OLSON
D.C. VA. IJOHN S. MILES
D.C. MD. OF COUNSEL
GILMAN & PANKA
IOP COUNSEL1625 H STREET, N.W.
SUITE 800
WASHINGTON, D.C. 20006-3004
TELEPHONE (202) 331-8000
FAX (202) 331-8000

July 31, 1992

BY FAX TO 202-219-3923Richard Zanfardino, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463Re: MUR 3553;
English First Political Victory Fund

Dear Mr. Zanfardino:

This will confirm our telephone conversation of today and my request that our clients in the above matter, English First Political Victory Fund and Frank McGlynn, Treasurer, be allowed a brief extension of time to submit their response to your letter of July 7, 1992.

Per our conversation, the response will be sent as soon as it can be prepared during the coming week, and hopefully no later than August 7, 1992.

We thank you for your consideration and cooperation in this matter.

Sincerely yours,



John S. Miles

JSM:kjh

cc: English First Political Victory Fund

93040984203

STATEMENT OF DESIGNATION OF COUNSEL

NO: 3553

NAME OF COUNSEL: William J. Olson, PC (William J. Olson & John S. Miles)

ADDRESS: 9180 Greensboro Drive
#1070
McLean, VA 22102

TELEPHONE: (703) 356-5085

The above-named individuals ^{are} ~~is~~ hereby designated as my
counsel and ^{are} ~~is~~ authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
92 JUL 31 AM 10:28

7-27-92
Date

Frank McGlynn
Signature

RESPONDENT'S NAME: English First Political Victory Fund &
Frank McGlynn, Treasurer

ADDRESS: 3001 Forbes Place
Suite 102
Springfield, VA 22151

HOME PHONE: _____

BUSINESS PHONE: (703) 321-9818

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WILLIAM J. OLSON, P.C.

ATTORNEYS AT LAW

8180 GREENSBORO DRIVE, SUITE 1070
MCLEAN, VIRGINIA 22102-3823
TELEPHONE (703) 356-5070
FAX (703) 356-5085

1815 H STREET NW
SUITE 500
WASHINGTON, D.C. 20006-3604
TELEPHONE (202) 823-9086
FAX (202) 331-8986

WILLIAM J. OLSON
(DC VA)
JOHN S. MILES
DC MD. OF COUNSEL
GILMAN & PANGIA
(OF COUNSEL)

July 28, 1992

By mail and
fax to 202-219-3923

Richard Zanfardino, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3553;
English First Political Victory Fund

Dear Mr. Zanfardino:

As you know, our firm represents English First Political Victory Fund and Frank McGlyn, Treasurer, in the above-referenced matter. We understand that our clients telefaxed you yesterday the Statement of Designation of Counsel that you requested. A copy thereof is also attached to this letter.

This will acknowledge receipt of your letter, dated July 7, 1992, to our clients regarding MUR 3553, which was received by our clients on or about July 10, 1992. We would ask that the matter remain confidential.

This will also confirm our clients intend to respond to your letter. Indeed, this office was contacted promptly after receipt of your letter of July 7, 1992, and we have been working diligently in an effort to respond as requested.

As I informed you in our telephone conversation last week, I had some difficulty locating some of the documents relative to this matter prior to my out-of-town trip, from which I just returned, necessitating our request for an extension of time to file a response in this matter.

We expect that our response can be sent on or before July 31, 1992, as we discussed. If this becomes impossible, however, we will notify you of our situation, as you suggested.

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WILLIAM J. OLSON, P.C.

ATTORNEYS AT LAW

8180 GREENSBORO DRIVE, SUITE 1070
MCLEAN, VIRGINIA 22102-3823

TELEPHONE (703) 356-8070

FAX (703) 356-8085

WILLIAM J. OLSON
(D.C. VA.)
JOHN S. MILES
(D.C., MD., OF COUNSEL)
GILMAN & PANGIA
(OF COUNSEL)

1815 H STREET N.W.
SUITE 500
WASHINGTON, D.C. 20006-3604
TELEPHONE (202) 223-9088
FAX (202) 331-8988

July 28, 1992

By mail and
fax to 202-219-3923

Richard Zanfardino, Esquire
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3553;
English First Political Victory Fund

Dear Mr. Zanfardino:

As you know, our firm represents English First Political Victory Fund and Frank McGlyn, Treasurer, in the above-referenced matter. We understand that our clients telefaxed you yesterday the Statement of Designation of Counsel that you requested. A copy thereof is also attached to this letter.

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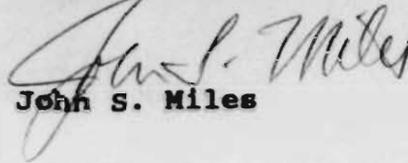
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OFFICE OF GENERAL COUNSEL
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Thank you for your cooperation in this matter.

Sincerely yours,


John S. Miles

JSM:kjh

cc: English First Political Victory Fund

93040984206



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 3, 1992

BY FACSIMILE

John S. Miles, Esq.
8180 Greensboro Dr. Suite 1070
McLean, VA 22102-3823

RE: MUR 3553
English First Political
Victory Fund, and Frank
McGlynn, as treasurer

Dear Mr. Miles:

This is in response to your letter dated July 31, 1992, which we received on July 31, 1992, requesting an extension until August 7, 1992 to respond to the complaint in this matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on August 7, 1992.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Richard M. Zarfardino
Staff Member

93040984207



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 5, 1992

BY FACSIMILE

Connecticut Republican Federal
Campaign Committee
Kevin Delgabbo, Executive Director
78 Oak St.
Hartford, CT. 06106

RE: MUR 3553

Dear Mr. Delgabbo:

Pursuant to our phone conversation today, I am enclosing a copy of the July 7, 1992 complaint notification letter sent to the Connecticut Republican Federal Campaign Committee and Robert Norman, as treasurer. Please review the letter and enclosures and respond to this Office within 15 days.

If you have any further questions, please contact me at (202) 219-3690.

Sincerely,

A handwritten signature in black ink, appearing to read "R. M. Zanfardino".

Richard M. Zanfardino
Staff Member

93040984208

GLC 6029

WILLIAM J. OLSON, P.C.

ATTORNEYS AT LAW

8180 GREENSBORO DRIVE, SUITE 1070
MCLEAN, VIRGINIA 22102-3823

TELEPHONE (703) 356-5070

FAX (703) 356-5085

WILLIAM J. OLSON
(D.C., VA.)
JOHN S. MILES
(D.C., MD., OF COUNSEL)
GILMAN & PANGIA
(OF COUNSEL)

1815 H STREET, N.W.
SUITE 800
WASHINGTON, D.C. 20006-3604
TELEPHONE (202) 223-9066
FAX (202) 331-8986

August 7, 1992

HAND DELIVER

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

Attention: Jonathan A. Bernstein, Esquire
Assistant General Counsel

Re: English First Political Victory Fund
Frank McGlynn, Treasurer; MUR 3553

Dear Sir:

This firm represents English First Political Victory Fund ("EF-PVF") and Frank McGlynn, Treasurer, in the above-referenced matter. Enclosed is a copy of the Statement of Designation of Counsel, signed by Frank McGlynn, Treasurer, EF-PVF, authorizing the undersigned to act as counsel in this matter. (A copy was previously forwarded to you directly by EF-PVF on July 27, 1992.)

MUR 3553 was instituted by the Commission following the filing of a complaint against Tom Scott, candidate for United States Representative from the State of Connecticut in 1990, and his principal campaign committee ("the Respondents"), filed by the Democratic Congressional Campaign Committee ("DCCC") on July 1, 1992. According to DCCC, the Respondents violated the Federal Election Campaign of 1971, as amended ("FECA" or "the Act"), 2 U.S.C. sections 431, et seq., and related Federal Election Commission regulations, 11 C.F.R. sections 100.1, et seq., by accepting excessive contributions and by failing to file accurate reports of receipts and disbursements.

With respect to EF-PVF, DCCC has alleged that \$3,000 in excessive contributions were made in 1990 to the Scott campaign and that appropriate refunds were never made. This does not appear to be accurate, as described below. Indeed, although EF-PVF was premature in designating itself as a multicandidate

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OFFICE OF GENERAL COUNSEL

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committee, it appears that the situation was rectified and the appropriate reports filed and refunds made.

We are writing in response to your letter of July 7, 1992, to EF-PVF, to demonstrate that no action should be taken against EF-PVF in this matter.

RELEVANT FACTS

EF-PVF was formed as a political committee on May 29, 1990. Its FEC Form 1 (Statement of Organization) apparently was filed with the Federal Election Commission on or before June 8, 1990.¹

EF-PVF became a multicandidate committee on December 8, 1990. At that time, it had been registered for six months, it had received contributions from more than 50 contributors, and it had made contributions to at least five federal candidates.

During 1990 and 1991, inter alia, EF-PVF made contributions totalling \$7,000 to the campaign committees of Tom Scott, Republican candidate for the United States House of Representatives from Connecticut. These contributions were made with respect to Mr. Scott's primary election campaign, general election campaign, and for debt retirement. The contributions were made as follows:

1. June 28, 1990 undesignated -- primary
 \$1,000 contribution
 see October 15, 1990 Quarterly Report
2. October 11, 1990 general election on September 11, 1990
 \$3,000 contribution
 see 12th day Report preceding general
 election on November 6, 1990
3. October 30, 1990 designated general
 \$1,000 contribution
 see 30 day Report following general
 election on November 6, 1990
4. December 9, 1990 designated, general but for debt
 retirement
 \$1,000 contribution

¹ It appears that the document was received at the FEC earlier, but was not officially registered until June 8, 1990. As discussed below, EF-PVF became confused about the time it became a multicandidate committee, believing that it had achieved that status in October 1990, rather than December 1990. Attached hereto as Exhibit A is the report of EF-PVF where it stated its belief that it was a multicandidate committee.

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see January 31, 1991 Year End Report 1990

5. April 18, 1991 undesignated, but for debt retirement
 \$1,000 contribution
 see July 31, 1991 Mid Year Report

As appears more fully below, a total of \$2,000 was refunded to EF-PVF by the Scott for Congress campaign, making the net contribution amount \$5,000, \$1,000 of which was for the primary election on September 11, 1990, and \$1,000 of which was made after the general election of November 6, 1990. As can be seen, \$2,000 of the contribution of October 11, 1990, and the contribution of \$1,000 on October 30, 1990, initially were excessive, because EF-PVC did not achieve multicandidate committee status until December 8, 1990 (when it had been officially registered with the FEC for six months). But EF-PVF believed that it had achieved multicandidate committee status on October 11, 1990, as indicated on its report to the FEC (12th day report preceding general election on November 6, 1990, covering the period between October 1, 1990 and October 17, 1990, Exhibit A hereto). The notification from the FEC that EF-PVF had not yet achieved multicandidate committee status (see letter of November 7, 1990, Exhibit B hereto) was the first notice to EF-PVF that its contributions to the Scott campaign were in excess of those allowed by law. Accordingly, referring to the FEC's letter of November 7, 1990, EF-PVF requested a refund from the Scott campaign.

Obviously, however, there was still some confusion about the extent of permissible contributions, especially since EF-PVF was about to become a multicandidate committee in early December and, upon receipt of a \$1,000 refund from the Scott for Congress campaign, on December 7, 1990, EF-PVF wrote to the FEC confirming that the refund had been received and asking for confirmation that the problems referred to (in the FEC letter of November 7, 1990, Exhibit B hereto) had been cleared up. See letter of December 7, 1990, Lawrence D. Pratt, President, English First, to Kenneth A. Davis, Jr., Reports Analysis Division, FEC, Exhibit C hereto. To the best of our knowledge, there was no response to that letter of December 7, 1990, other than a letter from the FEC (Mr. Davis) to EF-PVF, dated March 13, 1991 (Exhibit D hereto), requesting that EF-PVF amend its report to show the refund on the correct line. English First certainly believed that there was no problem.

As of December 8, 1990, EF-PVF had achieved multicandidate committee status. On December 9, 1990, it contributed an additional \$1,000 to the Scott for Congress campaign. An additional \$1,000 was donated to Scott for Congress on April 18, 1991. Both of these contributions were apparently for debt retirement.

93040984211

By letter dated March 19, 1991, the FEC for the first time addressed the question of an excessive contribution being reflected on the 30 day post-general report of EF-PVF covering the period 10/18/90 through 11/26/90. See Exhibit E hereto. As indicated above, EF-PVF had on that report reflected a contribution of \$1,000 to the Scott for Congress campaign. Upon receipt of the letter of March 19, 1991, from the FEC, however, it requested a refund of that \$1,000 contribution and the refund was reported as received on June 29, 1991.

DISCUSSION

Technically, as already indicated above, EF-PVF made pre-election contributions to the Scott for Congress campaign, in the amount of \$3,000 beyond the limit for new campaign committees, but within the limit of \$5,000 for multicandidate committees. Of that excess, \$2,000 was actually refunded to EF-PVF by the Scott for Congress campaign. Nevertheless, as we would hope you will realize, the error in this regard was not an intentional one, and was made through a misapprehension of EF-PVF's status as a multicandidate committee. In each instance, the facts were fully reported to the FEC, including the mistaken fact that EF-PVF had qualified for multicandidate committee status as of October 11, 1990 (see Exhibit A). Furthermore, EF-PVF acted to try to correct the situation as soon as an error was discovered. Upon receipt of notification from the FEC, in November 1990, of an excessive contribution, EF-PVF acted immediately to retrieve the excess, and obtained a refund from the Scott for Congress campaign on December 7, 1990.² And it wrote a letter to the FEC asking for assurance from the agency that all was in order and that the error in the earlier report had been rectified in full. There was no response to that letter and EF-PVF thus assumed that all was in order.

In short, EF-PVF made an initial error when it prematurely designated itself as a multicandidate committee. The erroneous reports and excessive contribution both stemmed from that initial error.

We would respectfully submit that EF-PVF acted reasonably under the circumstances. Although its error in prematurely

² In actual fact, although the excess was \$2,000, the refund was only \$1,000 because EF-PVF (correctly assuming that, as a new committee, it could contribute a total of \$2,000 to a candidate or a candidate's committee for an election cycle) apparently did not consider the \$1,000 contribution for the primary election it had made in June, 1990, to the Scott for Congress campaign. Again, it is important to note that EF-PVF believed that it had acted properly, and requested confirmation from the FEC that it had done so. (See letter of December 7, 1990, Exhibit C hereto.)

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designating itself as a multicandidate committee was made, it was clearly an error made in good faith, with total disclosure to the FEC. And both times the error was pointed out to it, EF-PVF acted to bring about rectification, including seeking (and obtaining) refunds of the excess contributions and amending its reports accordingly.

Moreover, aside from the timing of the contributions, no harm has been done. EF-PVF contributed a net of \$5,000 (\$1,000 for the primary election, \$2,000 for the general election, and \$2,000 for debt retirement) to the Scott for Congress campaign. It legally could have contributed at least \$6,000 (\$1,000 for the primary election, \$1,000 for the general election, and \$4,000 for debt retirement).

CONCLUSION

For the foregoing reasons, we would respectfully submit that the complaint against EF-PVF should be dismissed.

Sincerely yours,


William J. Olson

WJO:kjh

Enclosures

cc: English First Political Victory Fund

93040984213

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) English First Political Victory Fund	2. FEC IDENTIFICATION NUMBER C00245720
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 8001 Forbes Pl., Suite 102	
CITY, STATE and ZIP CODE Springfield VA 22151	3. <input checked="" type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on <u>10/11/90</u> (date).

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report

Monthly Report Due On:

- | | | |
|--------------------------------------|---------------------------------------|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> June 20 | <input type="checkbox"/> October 20 |
| <input type="checkbox"/> March 20 | <input type="checkbox"/> July 20 | <input type="checkbox"/> November 20 |
| <input type="checkbox"/> April 20 | <input type="checkbox"/> August 20 | <input type="checkbox"/> December 20 |
| <input type="checkbox"/> May 20 | <input type="checkbox"/> September 20 | <input type="checkbox"/> January 31 |

- Twelfth day report preceding general
(Type of Election)
election on 11/6/90 in the State of _____
- Thirtieth day report following the General Election on _____
in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
8.	Covering Period <u>10/1/90</u> through <u>10/17/90</u>		
6.	(a) Cash on Hand January 1, 1990		\$ -0-
	(b) Cash on Hand at Beginning of Reporting Period	\$ 24,962.54	
	(c) Total Receipts (from Line 18)	\$ 202.50	\$ 48,954.80
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 25,164.04	\$ 48,954.80
7.	Total Disbursements (from Line 28)	\$ 12,757.00	\$ 36,546.76
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 12,408.04	\$ 12,408.04
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20483 Toll Free 800-424-9530 Local 202-376-3120
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$	

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

Type or Print Name of Treasurer: Frank McGlynn

Signature of Treasurer: _____ Date: _____

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

93040984214

DETAILED SUMMARY PAGE

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

Name of Committee (in full)	Report Covering the Period	
English First Political Victory Fund	From: 10/1/90	To: 10/17/90
I RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)		
(ii) Unitemized	202.50	48,954.80
(iii) Total of contributions from individuals	202.50	48,954.80
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))	202.50	48,954.80
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	202.50	48,954.80
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	7.00	11,796.76
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	12,750.00	24,750.00
22. INDEPENDENT EXPENDITURES (use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	12,757.00	36,546.76
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))	202.50	48,954.80
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)	202.50	48,954.80
32. TOTAL OPERATING EXPENDITURES (from Line 19)	7.00	11,796.76
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)		
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	7.00	11,796.76

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11(a)(i)
11(a)(ii)
11(a)(iii)
11(b)
11(c)
11(d)
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19
20
21
22
23
24
25
26(a)
26(b)
26(c)
26(d)
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34

SCHEDULE B

ITEMIZED DISBURSEMENTS

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

PAGE 1 OF 1
FOR LINE NUMBER 21

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

NAME OF COMMITTEE (In Full)

English First Political Victory Fund C00245720

93040984216

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jimmy J. Gloria 2116 Swetzer Rd. Penryn CA 95663	Independent expenditure for CA Assemblyman Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/2/90	1,000.00
B. Full Name, Mailing Address and ZIP Code Helms for Senate 4505 Falls of the Neuf Rd. Raleigh NC 27609	Contribution NC/Senate Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	2,000.00
C. Full Name, Mailing Address and ZIP Code Silber for Gov. 441 Stuart St., 2nd Fl. Boston MA 02116	Contribution MA/Governor Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	2,000.00
D. Full Name, Mailing Address and ZIP Code Scott for Congress P. O. Box 5106 Milford CT 06460	Contribution CT/3 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	3,000.00
E. Full Name, Mailing Address and ZIP Code Dudycz for Congress 6153 North Northwest Hwy Chicago IL 60646	Contribution IL/11 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	2,500.00
F. Full Name, Mailing Address and ZIP Code English First PAC 4246 2nd Ave. Sacramento CA 95817	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	2,000.00
G. Full Name, Mailing Address and ZIP Code Committee to Elect Ted Whitaker 41 Linwood Dr. N. Kingstown RI 02852	Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	250.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	12,750.00



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

NOV 7 1990

Frank McGlynn, Treasurer
English First Political Victory
Fund
8001 Forbes Place, Suite 102
Springfield, VA 22151

Identification Number: C00245720

Reference: 12 Day Pre-General Report (10/1/90-10/17/90)

Dear Mr. McGlynn:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. (2 U.S.C. §441a(a))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with a clarifying information. If you have made an excessive contribution, you should either notify the recipient and request a refund of the amount in excess of \$1,000 and/or notify the recipient, in writing, of your redesignation of the contribution. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal steps regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

93040984217

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Kenneth Davis, Jr.

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

93040984218

ENGLISH FIRST

OUR MODEL IS THE SPIRIT OF LIBERTY, FREEDOM, AND THE SPIRIT OF IMMIGRANTS WHO LEARNED ENGLISH AND BECAME FULL MEMBERS OF AMERICAN SOCIETY

December 7, 1990

Mr. Kenneth A. Davis, Jr.
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

Reference: 12 Day Pre-General Report (10/1/90-10/17/90)

Dear Mr. Davis:

We have now received a \$1000 refund from the Scott for Congress campaign. Earlier, per our letter of November 19, we were able to inform you that the \$500 refund from the Dudyca for Congress campaign had been received.

Hopefully this clears up the problems from the referenced report. Can you tell me if this now closes the matter?

Sincerely,



Lawrence D. Pratt
President

EXHIBIT C

93040984220



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MR 13 1991

Frank McGlynn, Treasurer
English First Political Victory Fund
8001 Forbes Place, Suite 102
Springfield, VA 22151

Identification Number: C00245720

Reference: Year End Report (11/27/90-12/31/90)

Dear Mr. McGlynn:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your letter dated December 7, 1990 stated that you received a \$1,000 refund from the Scott for Congress Campaign and a \$500 refund from the Dudyas for Congress Campaign. Refunds are reported on Line 16 of the report covering the period during which they are received. Please amend your report accordingly.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Kenneth A. Davis, Jr.

Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

93040984221



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

MAR 19 1991

Frank McGlynn, Treasurer
English First Political Victory
Fund
8001 Forbes Place, Suite 102
Springfield, VA 22151

Identification Number: C00245720

Reference: 30 Day Post-General Report (10/18/90-11/26/90)

Dear Mr. McGlynn:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. The Act precludes a political committee, other than a multicandidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. (2 U.S.C. §441a(a))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with a clarifying information. If you have made an excessive contribution, you should either notify the recipient and request a refund of the amount in excess of \$1,000 and/or notify the recipient, in writing, of your redesignation of the contribution. All refunds and redesignations must be made within sixty days of the treasurer's receipt of the contribution. Refunds are reported on Line 16 of the Detailed Summary Page and on Schedule A of the report covering the period during which they are received. Redesignations are reported as memo entries on Schedule B of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

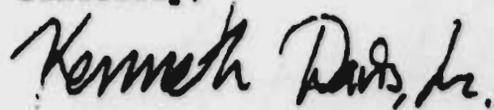
Although the Commission may take further legal steps regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

93040984222

-For future reporting, please be advised that contributions to federal candidates and political committees should be itemized on a separate Schedule B supporting Line 21 of the Detailed Summary Page. Contributions to non-federal candidates and committees should be itemized on Schedule B supporting Line 27.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,



Kenneth A. Davis, Jr.
Reports Analyst
Reports Analysis Division

93040984223

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Disbursements may not be sold or used by any person for the purpose of collecting contributions or for any other purpose other than using the name and address of any political committee to obtain contributions from such committee.

NAME OF COMMITTEE (in Full) **English First Political Victory Fund C00245720**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Jimmy J. Gloria 2116 Swetser Rd. Penryn CA 95663	Independent expenditure for CA Assemblyman Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/2/90	1,000.00
Helms for Senate 4508 Falls of the Neuf Rd. Raleigh NC 27609	Contribution NC/Senate Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	2,000.00
Silber for Gov. 441 Stuart St., 2nd Fl. Boston MA 02116	Contribution MA/Governor Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	2,000.00
Scott for Congress P. O. Box 5106 Milford CT 06460	Contribution CT/3 Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	3,000.00
Dudves for Congress 6153 North Northwest Hwy Chicago IL 60646	Contribution IL/11 Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	2,500.00
English First PAC 4246 2nd Ave. Sacramento CA 95817	Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	2,000.00
Committee to Elect Ted Whitaker 41 Linwood Dr. N. Kingstown RI 02852	Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10/11/90	250.00
	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

30653720

SUBTOTAL of Disbursements This Page (optional)	
TOTAL This Period (last page this line number only)	12,750.00

**JAMES F. ALTHAM, JR.
ATTORNEY AND COUNSELOR AT LAW
60 ALLENE DRIVE
HAMDEN, CT 06517
(203) 288-9424**

August 21, 1992

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

Attention: Richard M. Zanfardino, Esq.
General Counsel's Office

Re: NUR 3553

Complainants: Robert F. Bauer, Esq.
Judith L. Corey, Esq.
Counsel to the Democratic Congressional
Campaign Committee

Respondent: Tom Scott
Tom Scott for Congress Committee (CT-3) and
John Marvell, Its Treasurer

Date of Complaint: 7/1/92 (Received by FEC: 7/1/92)
Date of FEC Notification to Respondent: 7/7/92
Date of Receipt by Respondents: 7/10/92 (est.)

Dear Mr. Zanfardino,

The purpose of this letter is to request, based upon response submitted this date by fax and previous submissions, that the FEC summarily dismiss the above-numbered complaint against:

Respondent: Tom Scott
Tom Scott for Congress Committee (CT-3) and
John Marvell, Its Treasurer

Respectfully submitted,

J. D. Marvell

Tom Scott
Tom Scott for Congress
Mr. John D. Marvell, Treasurer of Tom Scott for Congress
by James F. Altham, Jr., their attorney

93040984225

**JAMES F. ALTHAM, JR.
ATTORNEY AND COUNSELOR AT LAW
60 ALLENE DRIVE
HAMDEN, CT 06517
(203) 288-9424**

August 21, 1992

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

Attention: Richard M. Zanfardino, Esq.
General Counsel's Office

Re: MUR 3553

Complainants: Robert F. Bauer, Esq.
Judith L. Corey, Esq.
Counsel to the Democratic Congressional
Campaign Committee

Respondent: Scott for Congress Committee (CT-3) and
Marc Zanghi, Its Treasurer

Date of Complaint: 7/1/92 (Received by FEC: 7/1/92)

Date of FEC Notification to Respondent: 7/7/92

Date of Receipt by Respondents: 7/10/92 (est.)

Date to Which Response Deadline was Extended: 8/21/92

Dear Mr. Zanfardino,

As you know, this office represents the above-named respondents in MUR 3553. We have previously forwarded duly executed Statements of Designation of Counsel reflecting that representation.

We are in receipt of the following documents relevant to MUR 3553:

- a) A copy of the 6-page complaint filed by the Democratic Congressional Campaign Committee acting through its Counsel Robert F. Bauer, Esq. and Judith L. Corey, Esq. dated July 1, 1992, and apparently received by the FEC on July 1, 1992;
- b) A form entitled "Statement of Designation of Counsel;
- c) A two page letter directed to Tom Scott for Congress to the attention of Mr. Marc Zanghi from FEC Asst. General Counsel Jonathan A. Bernstein.

We understand that, despite the requirement of Mr. Bernstein's letter that a reply be forwarded by July 22, 1992, the time for replying has been formally extended to August 21, 1992

The following is our response. I hereby request, at your suggestion, an additional thirty days to complete our response to MUR 3553.

RESPONSE TO THE COMPLAINT:

1. *The Respondents Scott for Congress Committee and its Treasurer Marc Zanghi expect to deny that there is reason to believe that they have committed any violation as alleged in the complaint filed by the Complainant. Nonetheless, the complaint as to them is very wide-ranging and has required additional time to formulate a well-documented and carefully accurate response. We have made much progress but have not completed our search. It will be necessary to retrieve and review many documents. Therefore, we are requesting an additional time extension to do so.*
2. For the purpose of clarity, each of said respondents would raise to the attention of the Commission the fact that the complaint as stated in complainants' letter relates solely to activities attributed to this committee---Scott for Congress---which was Tom Scott's principal campaign committee for the 1990 election (see the first paragraph of complainants' letter and each and every substantive allegation).
3. The commission has nonetheless notified Mr. Scott, "Tom Scott for Congress---his 1992 principal campaign committee---and his 1992 treasurer John D. Marvell, although there are no allegations whatsoever as to 1992 election activity.
4. To the extent that the complainants attempt to implicate Tom Scott personally by speaking of him as though he were the committee or its treasurer, i.e.:

Page 2, Paragraph 3: "Mr. Scott did not refund.;"
"Mr. Scott finally refunded..."

Page 2, Paragraph 4: "This still left Mr. Scott with...He received a total of...where he was legally allowed to accept only...There is no evidence on his reports..."

Page 2, Paragraph 5: "...Mr. Scott accepted...."

Page 3, Paragraph 2: "Once again, Mr. Scott accepted"

Page 3, Paragraph 4: "...Mr. Scott failed to accurately compute..." "...excessive amounts donated to Mr. Scott."

complainants have done what may charitably be described as a very sloppy job of making allegations in light of their professional backgrounds. One is actually compelled to conclude that, motivated to use the FEC for political advantage, they have intentionally filed a complaint worded and designed in such fashion as to mislead the press and others less sophisticated and knowledgeable as to FEC regulations than FEC staff to believe that they have filed a substantive complaint against Mr. Scott. *They have made not a single allegation of any wrongdoing by Mr. Scott.*

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5. The allegations of the July 1, 1992 complaint relate solely to DCCC claims as to activities of "Scott for Congress"--Tom Scott's principal campaign committee for the 1990 election and its treasurer(s) but not the candidate, Tom Scott, whom I believe to have no independent reporting obligation of his own.
6. Tom Scott has, pursuant to law, created a principal campaign committee "Scott for Congress" for the 1990 campaign and designated Miss Doreen Rymkiewicz as its Treasurer, and later designated Marc Zanghi as her successor in that position. Tom Scott has, pursuant to law, created a principal campaign committee "Tom Scott for Congress" for the 1992 campaign and designated John D. Marvell as its Treasurer. Consequently, to the extent that the complaint NUR 3553 by Counsel for the Democratic Congressional Campaign Committee names Tom Scott individually as a respondent, it is groundless and no reasonable ground for the complaint should be found against him by the FEC.
7. At this point, we disregard the shotgun allegations of the first three paragraphs of the DCCC complaint, which contain no specific charges but the usual broad tarbrush so often used by the complainants' principal and servants.
8. We are, upon your advice, refraining from communication with the English First Political Victory Fund. We have previously received communications from FEC regarding 1990 contributions from English First Political Victory Fund and have, to the best of our knowledge, complied with each and every requirement of the regulations and those FEC communications regarding such contributions from English First Political Victory Fund and we await any further advice from FEC regarding such contributions and stand ready to do whatever FEC advises in that regard. We believe that we are in compliance already, however.
9. We are, upon your advice, refraining from communication with U. S. Security PAC. We have no reason, based upon our own knowledge, to believe that we are not in compliance with FEC requirements regarding U. S. Security PAC. When we were previously notified by FEC of the possibility that U. S. Security PAC was not qualified as a multicandidate committee, we contacted one Karen White of FEC to explain that Scott for Congress Committee and its Treasurer had not been able to reach U. S. Security PAC personnel to obtain specific information as to its multicandidate status and asked Karen White's assistance in that regard. She confirmed that U. S. Security PAC was merely a "potential" problem. We requested that Karen White get back to us if there was an actual problem. We have not heard from her or other FEC personnel since.

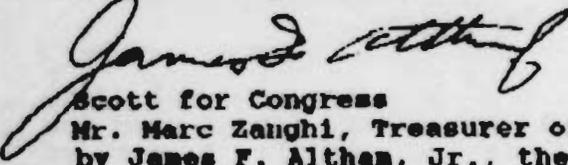
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10. We previously provided GOP 3's response to the substance of this complaint previously filed by Attorney Benjamin S. Proto, Jr. on or about July 19, 1992. Scott for Congress and Marc Zanghi, its Treasurer, have no reason to believe that they are in violation regarding GOP-3. We have, upon your advice, refrained from further communication with GOP-3. We believe that it is obvious that GOP-3 is far better versed in its own internal operations than are we and we have no reason to believe that Mr. Proto's response is inaccurate.
11. As to those items listed under "Other Excessive Party Contributions," and the specific allegation that the Scott for Congress Committee received "over \$20,000 during 1990 from various state and local party committees in Connecticut," the fact is that we received \$13,000 from such committees in 1990.
12. As to those items listed under "Inadequate Filings," disregarding DCCC's gratuitous editorializing, we would observe generally that the complainant should have a threshold responsibility to specify each item complained of. The Democratic Congressional Campaign Committee is not a mom-and-pop grocery store lacking in sophistication. By filing very generalized allegations, the complainants place an undue burden on respondents and are engaging in what amounts to an unacceptable "fishing expedition" that is rather analogous to discovery in a civil action. The DCCC behaves like a plaintiff's attorney suing General Motors in a products liability case and propounding interrogatories to the effect of "1. Have you ever been sued? If so, please provide all relevant details as to each and every case." FEC should require the complainants to make specify items.
13. As to "Inadequate Filings," we are providing this preliminary response, but we also continue to ask some relief in the form of a direction by FEC to complainants to narrow the scope of the complaint to specific items.
- o We attach a copy of the letter which we used as a form letter to each contributor who failed to provide full information. We understand that the mailing of such a letter to each such individual constitutes compliance with the "best efforts" standard and that we are therefore in compliance in this respect. When we received responses, we amended accordingly.
 - o The complaint as to separate and jumbled schedules is not specific and we cannot know to what the complainant refers from the information provided in the complaint.
 - o The same is true as to the following four items.
 - o However, as to the last item, the Hanley contribution of 3/26/90 should have been redesignated for the *convention*. Mr. Hanley gave a total of \$2,000 during the year which

included three periods and would have allowed \$3,000 in contributions from him.

14. Finally, as to "Inadequate Filings," we would like to observe that this complaint was filed just short of the second anniversary of a previous complaint by DCCC---MUR 3082---and that it is likely no coincidence that DCCC is in the habit of filing such complaints against those involved in very competitive Scott campaigns every two years at convention time. Coupled with the burdensome broadness and lack of specificity of the allegations, this chronological "coincidence" leads us to believe that DCCC is intentionally using the FEC process to require excessive staff time to be devoted to responding to DCCC fishing expeditions in a circumstance in which the Rosa DeLauro re-election campaign is, as usual, much more lavishly financed and staffed than is Scott's campaign. We feel that this is an abuse of the FEC process by DCCC and should be regarded as such.
15. As to Complainants' Conclusory paragraph, we will refrain from responding to the editorial commentary and respectfully suggest that the three requested remedies are surely excessive and unwarranted, particularly where, as here, there are either no violations whatsoever or a small number of minor violations.
14. **CONCLUSION** We respectfully urge that the FEC dismiss this complaint against Scott for Congress and Marc Zaughl, its Treasurer.

Respectfully submitted,


Scott for Congress
Mr. Marc Zaughl, Treasurer of Scott for Congress
by James F. Altham, Jr., their attorney

9 3 0 4 0 9 8 4 2 3 0

Scott for Congress - P.O. Box 5106 - Milford, Connecticut 06460 - (203) 876-7776 - Mac Zengh, Treasurer

**Tom
Scott**
UNITED STATES CONGRESS

Dear

Please allow me to thank you once again for your contribution to my Congressional campaign. With your help, we are waging an aggressive battle; each day I am more confident about victory on November 6.

As a contributor to our campaign, federal law requires that we request the name of your employer and your occupation. For your convenience in helping us comply with this regulation, I have enclosed a donor card and a business reply envelope.

Please forgive this intrusion, and thank you again for your help.

Sincerely,

Tom Scott

9 3 0 4 0 9 8 4 2 3 1

U.S. Security Political Action Committee

Mr. L. Francis Bouchey, President
Ambassador Curtin Winsor, Treasurer

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

SEP 3 1 39 PM '92

September 2, 1992

Mr. Jonathan A. Bernstein
Assistant General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

ATTN: Mr. Richard M. Zanfardino

REF: MUR 3553

Dear Mr. Bernstein,

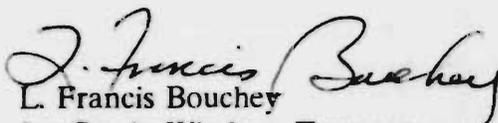
This is in response to your letter of July 7, 1992 which did not reach us at our new address until 20 August 1992.

It appears that we unintentionally violated F.E.C. rules by contributing an excessive \$800 to the campaign of Mr. Tom Scott, a fact reflected in our report to the commission. We did not understand that we had to wait until the F.E.C. certified the PAC as a multi-candidate committee once we had in fact satisfied the requirements, which had been done.

We shall be pleased to ask Mr. Scott to refund the amount in question if you advise we should do so.

Finally, we ask you take cognisance of the fact that the U.S. Security PAC is a small, essentially volunteer operation that gave less than \$10,000 during the 1990 election cycle and will only expand a comparable amount in 1992. We have made every good faith effort to comply with F.E.C. regulations and shall continue to do so. Please contact me if you require any further information.

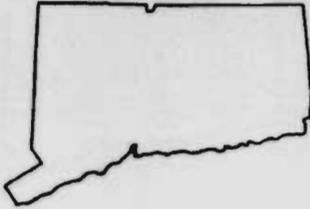
Sincerely,


L. Francis Bouchey
for Curtin Winsor, Treasurer

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
92 SEP -3 PM 4: 00

93040984232

OAC 9402



Connecticut Republicans

78 Oak Street, Hartford, Connecticut 06106
Telephone: (203) 547-0589 • Fax: (203) 278-8563

July 7, 1993

93 JUL 12 PM 3:50

Office of the General Counsel
Federal Elections Commission
999 E Street, S.W.
Washington, D.C. 20463

Re: Democratic Congressional Campaign Committee v.
Scott for Congress Committee, MUR 3553

To Whom It May Concern:

Please advise me of the status of the captioned complaint.

Thank you for your assistance with this matter.

Sincerely,

Philip L. Smith

JUL 12

93040984233



MUR # 3553

ADDITIONAL DOCUMENTS WILL BE ADDED TO THIS FILE AS THEY BECOME AVAILABLE. PLEASE CHECK FOR ADDITIONAL MICROFILM LOCATIONS.

93040984234



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3553

DATE FILMED 10/28/93 CAMERA NO. 2

CAMERAMAN MC

93040984235



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

Microfilm
 Public Records
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 3553.

12/10/93

93043542938

**THE READER IS REFERRED TO ADDITIONAL MICROFILM LOCATIONS
FOR THE FOLLOWING DOCUMENTS PERTINENT TO THIS CASE**

1. Memo, General Counsel to the Commission, dated September 22, 1992, Subject: Priority System Report. See Reel 354, pages 1590-94.
2. Memo, General Counsel to the Commission, dated April 14, 1993, Subject: Enforcement Priority System. See Reel 354, pages 1595-1620.
3. Certification of Commission vote, dated April 28, 1993. See Reel 354, pages 1621-22.
4. General Counsel's Report, In the Matter of Enforcement Priority, dated December 3, 1993. See Reel 354, pages 1623-1740.
5. Certification of Commission vote, dated December 9, 1993. See Reel 354, pages 1741-1746.

23043542939



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Bauer, Esq.
Judith Corley, Esq.
Perkins Coie
607 Fourteenth Street, NW
Washington, DC 20005-2011

RE: MUR 3553

Dear Ms. Corley and Mr. Bauer:

On July 1, 1992, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Tom Scott, Tom Scott for Congress, and John D. Marvell, as treasurer, Scott for Congress, and Marc Zanghi, as treasurer, U.S. Security PAC, Inc., and Curtin Winsor, as treasurer, Connecticut Third Congressional District Republicans, and Benjamin S. Proto Jr., as treasurer, and the Connecticut Republican Federal Campaign Committee and Robert Norman, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter. This matter will become part of the public record within 30 days.

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).

Sincerely,

Erik Morrison
Erik Morrison
Staff Member

Attachment
Narrative

Date the Commission voted to close the file:

DEC 09 1993

23043542940

MUR 3553
Tom Scott for Congress

This complaint generated matter involves alleged excessive contributions by some small PACs to Tom Scott's 1990 congressional campaign in Connecticut's 3rd CD. There are also some allegations regarding misreporting and a possible issue involving affiliation of local party committees. The activity involved no impact on the process, no serious intent, and no substantial amounts of money.

23043542941



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

Connecticut Third Congressional
District Republicans
Benjamin S. Proto Jr., Treasurer
1877 Broadridge Avenue
Stratford, CT 06497

RE: MUR 3553

Dear Mr. Proto:

On July 7, 1992, the Federal Election Commission notified the Connecticut Third Congressional District Republicans and you, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Connecticut Third Congressional District Republicans, and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (302) 219-3690.

Sincerely,

Erik Morrison

Erik Morrison
Staff Member

23043542942

Benjamin S. Proto Jr., treasurer
Page 2

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043542943

MUR 3553
Tom Scott for Congress

This complaint generated matter involves alleged excessive contributions by some small PACs to Tom Scott's 1990 congressional campaign in Connecticut's 3rd CD. There are also some allegations regarding misreporting and a possible issue involving affiliation of local party committees. The activity involved no impact on the process, no serious intent, and no substantial amounts of money.

23043542944



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

William J. Olson, PC
William J. Olson, Esq.
John S. Miles, Esq.
8180 Greensboro Drive,
#1070
McLean, VA 22102

RE: MUR 3553

Dear Mr. Olson and Mr. Miles:

On July 7, 1992, the Federal Election Commission notified the English First Victory Fund, and Frank McGlynn as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the English First Victory Fund, and Frank McGlynn as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Erik Morrison
Erik Morrison
Staff Member

23043542945

English First Political Victory Fund, Frank McGlynn as treasurer
Page 2

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043542946

MUR 3553

Tom Scott for Congress

This complaint generated matter involves alleged excessive contributions by some small PACs to Tom Scott's 1990 congressional campaign in Connecticut's 3rd CD. There are also some allegations regarding misreporting and a possible issue involving affiliation of local party committees. The activity involved no impact on the process, no serious intent, and no substantial amounts of money.

23043542947



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

DEC 10 1993

L. Francis Bouchey
U.S. Security PAC, Inc.
1667 K Street, NW
Suite 200
Washington, DC 20006

RE: MUR 3553

Dear Mr. Bouchey:

On July 7, 1992, the Federal Election Commission notified U.S. Security PAC, Inc. and Curtin Winsor, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against U.S. Security PAC, Inc. and Curtin Winsor, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Erik Morrison
Staff Member

23043542948

Curtin Winsor, treasurer
Page 2

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1993

73043542949

MUR 3553
Tom Scott for Congress

This complaint generated matter involves alleged excessive contributions by some small PACs to Tom Scott's 1990 congressional campaign in Connecticut's 3rd CD. There are also some allegations regarding misreporting and a possible issue involving affiliation of local party committees. The activity involved no impact on the process, no serious intent, and no substantial amounts of money.

23043542950



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1993

Robert Norman, Treasurer
Connecticut Republican Federal
Campaign Committee
78 Oak Street,
Hartford, CT 06106

RE: MUR 3553

Dear Mr. Norman:

On July 7, 1992, the Federal Election Commission notified the Connecticut Republican Federal Campaign Committee and you, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Connecticut Republican Federal Campaign Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Erik Morrison
Staff Member

23043542951

Robert Norman, treasurer
Page 2

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043542952

MUR 3553

Tom Scott for Congress

This complaint generated matter involves alleged excessive contributions by some small PACs to Tom Scott's 1990 congressional campaign in Connecticut's 3rd CD. There are also some allegations regarding misreporting and a possible issue involving affiliation of local party committees. The activity involved no impact on the process, no serious intent, and no substantial amounts of money.

93043542953



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

DEC 10 1995

James F. Altham, Esq.
60 Allene Drive
Hamden, CT 06517

RE: MUR 3553

Dear Mr. Altham:

On July 7, 1992, the Federal Election Commission notified Tom Scott, Tom Scott for Congress, John D. Marvell, as treasurer, and Scott for Congress, Marc Zanghi, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against Tom Scott. See attached narrative. Accordingly, the Commission closed its file in this matter.

The confidentiality provisions of 2 U.S.C. § 437g(a)(12) no longer apply and this matter is now public. In addition, although the complete file must be placed on the public record within 30 days, this could occur at any time following certification of the Commission's vote. If you wish to submit any factual or legal materials to appear on the public record, please do so as soon as possible. While the file may be placed on the public record prior to receipt of your additional materials, any permissible submissions will be added to the public record when received.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Erik Morrison
Erik Morrison
Staff Member

93043542954

Tom Scott, Tom Scott for Congress, John D. Marvell as treasurer,
Scott for Congress, Marc Zanghi as treasurer
Page 2

Attachment
Narrative

Date the Commission voted to close the file: DEC 09 1993

23043542955

MUR 3553
Tom Scott for Congress

This complaint generated matter involves alleged excessive contributions by some small PACs to Tom Scott's 1990 congressional campaign in Connecticut's 3rd CD. There are also some allegations regarding misreporting and a possible issue involving affiliation of local party committees. The activity involved no impact on the process, no serious intent, and no substantial amounts of money.

23043542956