



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3558

DATE FILMED 8-31-94 CAMERA NO. 2

CAMERAMAN JMH

24043564150

Citizens for a Bright Light

MUR 3558

JUL 17 12 50 PM '92
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

Mr. Lawrence Noble
Office of the General Counsel
999 E. Street, N.W.
Washington, DC 20463

Dear Mr. Noble:

Enclosed is my sworn statement concerning Federal Election Law violations between Congressman Louis Stokes and Mr. John Coyne.

Please do not hesitate to contact me if you have any questions about this.

Sincerely,


Edmund V. Gudenas

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
92 JUL 17 PM 3:25

2 4 0 4 3 5 6 4 1 5 1



This is the Sworn Statement of Edmund V. Gudenas

I, Edmund V. Gudenas, am asking the Federal Elections Commission to investigate the origin of numerous \$1,000 donations to Congressman Louis Stokes. All of the donors are friends, relatives or employees of John M. Coyne, Mayor of the City of Brooklyn, Chairman of the Cuyahoga County Democratic Party and close political ally of Stokes.

I believe these funds were given to Louis Stokes in violation of Federal Election Laws because either the employees felt they were obligated to make these donations or money was given to the donor so the donor could pass the money onto Stokes.

These donors do not live in a district Stokes represents and most do not have incomes high enough to justify such large donations. All donations were exactly \$1,000 and most came in blocks on the same day.

It seems impossible that Mr. Coyne, the Mayor of Brooklyn, did not ask several of his employees at the City of Brooklyn to make these donations. On one day, August 31, 1990, Mr. Coyne and three city employees, plus four employees of Westbrook Village Apartments (partly owned by Mr. Coyne), plus two direct relatives and one friend all gave \$1,000 each to Stokes. These were the only donations Stokes received at this time and these were not part of a fund raising event. Mr. Coyne clearly organized this group and either told the employees that they must make a donation or actually provided the money for the donation.

The people who made these donations on that day of \$1,000 each had occupations as follows: co-property manager, clerk, leasing agent, co-property manager, co-property manager, leasing agent, manager, housewife, mayor, administrative assistant and retired.

Other donors of \$1,000 each were unemployed students who did not live in the district. These students are relatives of Mr. Coyne. The same day the students made the donations, another block of relatives, friends and employees also made donations of exactly \$1,000.

Only people who are friends, family or employees of Mr. Coyne made donations of \$1,000 in groups on the same day to Mr. Stokes. No other "middle class" resident of the Stokes District ever made this type of donation to Mr. Stokes. Even people who are much wealthier did not make these kinds of donations.

Coyne and Stokes are friends and each knew what the other person was doing. Stokes was well aware that the funds given to his Committee were from many people who could not have the funds on their own or who were told to make these contributions. The Stokes Campaign Committee has also given thousands of dollars to the Coyne Campaign Committee.

24043564152

Mr. Coyne has refused to provide public salary information on what the City of Brooklyn employees that made donations are paid. This is in direct violation of our State law. High salaries for lower-level positions may indicate that public money was used to pay City employees more so that they could make large donations.

The bottom line is that I do not believe that these "middle class" people would give \$1,000 donations to a Congressman who they could not vote for, had only token opposition and who already had hundreds of thousands of dollars in the bank without first being told to do so or given the money to do so. Louis Stokes knew exactly what was going on.

If the donors felt they had to make these donations then, very likely they will feel that they must protect Coyne and Stokes now.

I do not believe they will voluntarily provide all of the facts. Some research on your part will be necessary. With this in mind, I am suggesting several questions to ask these donors.

1. Who contacted the donors concerning the donation they made?
2. Why did they make the donation they did on that particular day?
3. What contact have they had with Louis Stokes?
4. How did they select the amount they did?
5. Why did they pick a Congressman outside of their own district instead of a person they could actually vote for?
6. Did Mr. Coyne ever discuss making a donation to Stokes with them?
7. Was their salary adjusted in any way to reflect the donation they made?
8. Did Mr. Coyne ever give them money to give to Mr. Stokes or other candidates?
9. How do they know Mr. Coyne? Or how are they related to Mr. Coyne?
10. What debts did they have at the time of these donations and amounts?
11. How many donations have they made to Louis Stokes? When? How much?
12. Have they ever made a donation of more than \$100 to any other candidate since 1986?

24043564153

Questions to Mr. Stokes.

1. What contact did you have with these donors? (personal visits, letters, thank you notes, etc.)
2. Which of these donors did you meet in person?

The attached list are the donations that I believe are possibly illegal.

Edmund V. Gudenas

Sworn to before me, a Notary Public in and for said County of Cuyahoga and State of Ohio, personally appeared the above named Edmund V. Gudenas, who acknowledge that he did sign the foregoing statement and that the same is his free act and deed.

In testimony whereof, I have hereunto set my hand and official seal at Euclyd, Ohio, this 14th day of July, 1992.

William R. Cervenk

Notary Public

WILLIAM R. CERVENK
Notary Public, State of Ohio
Recorded in Cuyahoga County
My Comm. Expires 08-31-95

94043564154

Joseph Pucci
102206 Biddulph Road
Brooklyn, OH 44144

Pamela J. Krickler
6279 Dawning Road
Brooklyn, OH 44144

Sandra L. Maloney
4740 Autumn Lane
Brooklyn, OH 44144

Candace R. Vitas
252 Gayle Drive
Sheffield Lake, OH 44054-1913

Debra J. Dixon
144 N. Beachon Street, #4A
Brighton, MA 92135

James Dixon, Jr.
1215 Ramona
Lakewood, OH 44107

Peter Luckianow
4691 Ridge Road
Brooklyn, OH 44144

Lois Pucci
10206 Biddulph Road
Brooklyn, OH 44144

Marlene Rain
1005 Oak Street
Medina, OH 44256

Jeanette Coyne
7130 Stone Road
Medina, OH 44256

Penny J. Dixon
1215 Ramona Avenue
Lakewood, OH 44107

24043564155

John M. Coyne
6620 Glencoe Avenue
Cleveland, OH 44144

Mary Coyne
4610 Sunset Trail
Brooklyn, OH 44144

Kathleen M. Rolland
4002 Bush Avenue
Cleveland, OH 44109

Paulette C. Higgins
3879 West 36th Street
Cleveland, OH 44109

Brenda S. Hartel
11391 Schwab Drive
Parma, OH 44130

Brenda S. Hartel
11391 Schwab Drive
Parma, OH 44130

Jeanie Joyce
3619 West 148th Street
Cleveland, OH 44111

James Coyne
6620 Glencoe Avenue
Brooklyn, OH 44114

Ruth J. Coyne
6620 Glencoe Avenue
Brooklyn, OH 44144

Maryann Merce
8060 North Hills Drive
Broadview Hts., OH 44147

Robert J. Mickey
6252 Brookside Drive
Brooklyn, OH 44144

94043564156

*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)

LOUIS STOKES FOR CONGRESS COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Sidney Spector 23305 Chagrin Blvd. Beachwood, OH 44122	Senior Housing Associates	8/25/86	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Managing Partner	Aggregate Year-to-Date > \$ 250.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
John M. Coyne 1296 West 6th Street Cleveland, OH 44113	Central Coordinating Services	2/5/86	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Owner	Aggregate Year-to-Date > \$ 1,500.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
James M. Carney, Jr. 1710 Ohio Savings Plaza Cleveland, OH 44114	Carney & Broadbent	9/5/86	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Attorney	Aggregate Year-to-Date > \$ 1,000.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Robert P. Madison 2339 North Park Blvd. Cleveland, OH 44106	Madison-Madison International	9/23/86	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Architect	Aggregate Year-to-Date > \$ 500.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
R. S. Sondhe 114 Anglers Drive Chagrin Falls, OH 44022	Polycarb, Inc.	9/30/86	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Resident	Aggregate Year-to-Date > \$ 550.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Manohar Daga 5507 Renee Drive Highland Heights, OH 44143	Dingus & Daga	9/30/86	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: CPA	Aggregate Year-to-Date > \$ 300.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Ramesh Y. Gavhane 9579 Shadow Hill Trail Chesterland, OH 44026	Arrow Fabricating Company	9/30/86	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: President	Aggregate Year-to-Date > \$ 300.00	

SUBTOTAL of Receipts This Page (optional) 8,450.00

TOTAL This Period (last page this line number only)

24043564157

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)

LOUIS STOKES FOR CONGRESS COMMITTEE

24043564158

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Joseph Pucci 10206 Biddulph Rd. Brooklyn, OH 44144	City of Brooklyn	10/21/86	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Fire Chief Aggregate Year-to-Date > \$ 1,000.00		
B. Full Name, Mailing Address and ZIP Code George B. Lane 6325 York Rd. Parma Hts., OH 44130	Retired Developer	10/21/86	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Aggregate Year-to-Date > \$ 1,000.00		
C. Full Name, Mailing Address and ZIP Code Pamela J. Krickler 6279 Dawning Rd. Brooklyn, OH 44144	City of Brooklyn	10/21/86	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Personnel & Records Clerk Aggregate Year-to-Date > \$ 1,000.00		
D. Full Name, Mailing Address and ZIP Code Sandra L. Maloney 4740 Autumn Lane Brooklyn, OH 44144	City of Brooklyn	10/29/86	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Clerk Aggregate Year-to-Date > \$ 1,000.00		
E. Full Name, Mailing Address and ZIP Code Barbara S. Resenthal 22276 Douglas Rd. Cleve., OH 44122	Jerry Sales	10/29/86	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: President Aggregate Year-to-Date > \$ 300.00		
F. Full Name, Mailing Address and ZIP Code Carole F. Hoover One Bratenahl Place Cleve., OH 44108	Greater Cleveland Growth Association	10/29/86	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Sr. Staff Officer Aggregate Year-to-Date > \$ 200.00		
G. Full Name, Mailing Address and ZIP Code Albert W. Thompson 100 Erieview Plaza, 34th Floor Cleve., OH 44114	Al Thompson & Associates	10/29/86	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Insurance Underwriter Aggregate Year-to-Date > \$ 300.00		

SUBTOTAL of Receipts This Page (optional) 4,800.00

TOTAL This Period (last page this line number only)

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)

LOUIS STOKES FOR CONGRESS COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Candace R. Vitas 19504 Chickasaw Cleve., OH 44119 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Central Coordinating Services	11/3/86	1,000.00
	Secretary	Aggregate Year-to-Date > \$ 1,000.00	
Fred Rzepka 25250 Rockside Rd. Bedford Hts., OH 44146 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	LPFM Partnership	11/3/86	250.00
	Partner	Aggregate Year-to-Date > \$ 250.00	
Peter Rzepka 25250 Rockside Rd. Bedford Hts., OH 44146 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	LPFM Partnership	11/3/86	250.00
	Partner	Aggregate Year-to-Date > \$ 250.00	
Louis Freiberg 25250 Rockside Rd. Bedford Hts., OH 44146 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	LPFM Partnership	11/3/86	250.00
	Partner	Aggregate Year-to-Date > \$ 250.00	
Martin Liston 25250 Rockside Rd. Bedford Hts., OH 44146 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	LPFM Partnership	11/3/86	250.00
	Partner	Aggregate Year-to-Date > \$ 250.00	
Ronald Ratner 10800 Brookpark Rd. Cleve., OH 44130 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Forest City Enterprises	11/3/86	500.00
	Executive	Aggregate Year-to-Date > \$ 500.00	
Charles Ratner 10800 Brookpark Rd. Cleve., OH 44130 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Forest City Enterprises	11/3/86	500.00
	Vice President	Aggregate Year-to-Date > \$ 500.00	

24043564159

TOTAL of Receipts This Page (optional)	11,100.00
TOTAL This Period (last page this line number only)	

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 6 OF 2
FOR LINE NUM: 115

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 campaign purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

LOUIS STOKES FOR CONGRESS COMMITTEE

60
 ✓
 35
 ✓
 43
 ✓
 24
 ✓
 4
 ✓
 7
 ✓
 2
 ✓
 4
 ✓
 1
 ✓
 60

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Arthur M. Reynolds 1155 - 15th Street, NW, #1004 Wash., DC 20005	Reynolds & Mundy Occupation: Attorney Aggregate Year-to-Date > \$500.00	6/9/88	500.00
Arthur E. Cameron 316 Pennsylvania Avenue, SE, #402 Wash., DC 20003	Self-Employed Occupation: Attorney Aggregate Year-to-Date > \$500.00	6.9/88	500.00
Thomas J. Davis 1501 Euclid Avenue Cleveland, OH 44115	Tom Davis Agency Occupation: President Aggregate Year-to-Date > \$500.00	6/9/88	500.00
Debra J. Dixon 144 N. Beacon Street, #4A Brighton, MA 02135	Student Occupation: Aggregate Year-to-Date > \$1,000.00	6/11/88	1,000.00
James Dixon, Jr. 1215 Ramona Lakewood, OH 44107	Student Occupation: Aggregate Year-to-Date > \$1,000.00	6/11/88	1,000.00
Pamela Krickler 6279 Dawning Drive Brooklyn, OH 44144	City of Brooklyn Occupation: Secretary Aggregate Year-to-Date > \$1,000.00	6/11/88	1,000.00
Peter Luckianow 4591 Ridge Road Brooklyn, OH 44144	General Coordinating Service Occupation: Aggregate Year-to-Date > \$1,000.00	6/11/88	1,000.00

SUBTOTAL of Receipts This Page (upright):

TOTAL This Period (list page this line number only):

SCHEDULE A

ITEMIZED

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

PAGE 7 OF 23
FOR LINE NUMBER 11a

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)

LOUIS STOKES FOR CONGRESS COMMITTEE

✓
✓
✓
✓
✓
✓
✓
✓

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lois Pucci 10206 Biddulph Road Brooklyn, OH 44144	Retired	6/11/88	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date \$ 1,000.00
Marlene Rain 1005 Oak Street Medina, OH 44256	Housewife	6/11/88	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date \$ 1,000.00
Jeanette Coyne 7130 Stone Road Medina, OH 44256	Housewife	6/11/88	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date \$ 1,000.00
Penny J. Dixon 1215 Ramona Avenue Lakewood, OH 44107	Housewife	6/11/88	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date \$ 1,000.00
John M. Coyne 6620 Glencoe Avenue Cleveland, OH 44144	City of Brooklyn	6/11/88	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Mayor		Aggregate Year-to-Date \$ 1,000.00
Mary Coyne 4610 Sunset Trail Brooklyn, OH 44144	Housewife	6/11/88	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		Aggregate Year-to-Date \$ 1,000.00
Cheryl Bobbins 1471 Girard Street, NW Wash., DC 20009	C. J. Bobbins	6/22/88	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Writer/Program Developer		Aggregate Year-to-Date \$ 200.00

SUBTOTAL of Receipts This Page (optional)

17,450.00

TOTAL This Period (Must use this line number only)

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 4 OF 14
FOR LINE NUMBER 11a

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)

LOUIS STOKES FOR CONGRESS COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Richard Meyers 2250 Clarendon Blvd., #411 Arlington, VA 22201	Self Employed	7/30/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Lobbyist	Aggregate Year-to-Date > \$ 1,000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dale P. Dirks 511 Capitol Ct., N.W., #300 Wash., D.C. 20002	Health and Medicine Counsel of Washington	7/30/90	2,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President	Aggregate Year-to-Date > \$ 2,000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Maurice Tempelsman 529 Fifth Avenue New York, NY 10017	Self Employed	7/30/90	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Lobbyist	Aggregate Year-to-Date > \$ 500.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Kathleen M. Rolland 4002 Bush Avenue Cleveland, OH 44109	Westbrook Village Apartments	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Co-Property Mgr.	Aggregate Year-to-Date > \$ 1,000.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Pamela Krickler 4737 Autumn Lane Brooklyn, OH 44144	City of Brooklyn	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Clerk	Aggregate Year-to-Date > \$ 1,000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Paulette C. Higgins 3879 West 36th Street Cleveland, OH 44109	Westbrook Village Apartments	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Leasing Agent	Aggregate Year-to-Date > \$ 1,000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Brenda S. Hartel 11391 Schwab Drive Parma, OH 44130	Westbrook Village Apartments	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Co-Property Mgr.	Aggregate Year-to-Date > \$ 1,000.00	

SUBTOTAL of Receipts This Page (optional)

7,500.00

TOTAL This Period (last page this line number only)

24947564162 ✓ ✓ ✓

SCHEDULE A

ITIALIZED RECEIPTS

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

PAGE OF
5 14
FOR LINE NUMBER
11a

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)

LOUIS STOKES FOR CONGRESS COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Brenda S. Hartel 11391 Schwab Drive Parma, OH 44130	Westbrook Village Apartments	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Co-property Mgr.	Aggregate Year-to-Date > \$ 1,000.00	
Jeanie Joyce 3619 West 148th Street Cleveland, OH 44111	Westbrook Village Apartments	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Leasing Agent	Aggregate Year-to-Date > \$ 1,000.00	
James Coyne 6620 Glencoe Avenue Brooklyn, OH 44114	City of Brooklyn	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Manager	Aggregate Year-to-Date > \$ 1,000.00	
Ruth J. Coyne 6620 Glencoe Avenue Brooklyn, OH 44144	Housewife	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	
John M. Coyne 6620 Glencoe Avenue Brooklyn, OH 44144	City of Brooklyn	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Mayor	Aggregate Year-to-Date > \$ 1,000.00	
Maryann Merce 8060 North Hills Drive Broadview Hts., OH 44147	City of Brooklyn	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Admin. Assistant	Aggregate Year-to-Date > \$ 1,000.00	
Robert J. Mickey 6252 Brookside Drive Brooklyn, OH 44144	Retired	8/31/90	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 1,000.00	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

13,500.00

62
64
35
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

Cheryle A. Wills, Treasurer
Louis Stokes for Congress Committee
P.O. Box 99358
Cleveland, Ohio 44199

RE: MUR 3558
Louis Stokes for Congress Committee
and Cheryle A. Wills, as treasurer

Dear Ms. Wills:

The Federal Election Commission received a complaint which indicates that the Louis Stokes for Congress 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 3558. 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.

94043564164

Ms. Cheryle A. Wills
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E Klein (by XM)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564165



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

July 23, 1992

Representative Louis Stokes
U.S. House of Representatives
2365 Rayburn House Office Building
Washington, D.C. 20515

RE: MUR 3558

Dear Honorable Stokes:

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 3558. 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.

74043564166

Representative Louis Stokes
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (By XM)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564167



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20541

July 23, 1992

Mr. John M. Coyne
6620 Glencoe Avenue
Cleveland, Ohio 44144

RE: MUR 3558

Dear Mr. Coyne:

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 3558. 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.

94043564168

Mr. John M. Coyne
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (b2xm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564169



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

July 23, 1992

Ms. Mary Coyne
4610 Sunset Trail
Brooklyn, Ohio 44144

RE: MUR 3558

Dear Ms. Coyne:

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 3558. 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.

94043564170

Ms. Mary Coyne
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (b2xm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564171



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

July 23, 1992

Ms. Kathleen M. Rolland
4002 Bush Avenue
Cleveland, Ohio 44109

RE: MUR 3558

Dear Ms. Rolland:

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 3558. 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.

74043564172

Ms. Kathleen M. Rolland
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (bsxm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564173



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20543

July 23, 1992

Ms. Paulette C. Higgins
3879 West 36th Street
Cleveland, Ohio 44109

RE: MUR 3558

Dear Ms. Higgins:

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 3558. 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.

74043564174

Ms. Paulette C. Higgins

Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein

Lisa E. Klein
Assistant General Counsel

Enclosures

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

24043564175



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

July 23, 1992

Ms. Brenda S. Hartel
11391 Schwab Drive
Cleveland, Ohio 44130

RE: MUR 3558

Dear Ms. Hartel:

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 3558. 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.

94043564176

Ms. Brenda S. Hartel

Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (b2xm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564177



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20541

July 23, 1992

Ms. Jeanie Joyce
3619 West 148th Street
Cleveland, Ohio 44111

RE: MUR 3558

Dear Ms. Joyce:

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 3558. 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.

94043564178

Ms. Jeanie Joyce
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564179



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

July 23, 1992

Mr. James Coyne
6620 Glencoe Avenue
Brooklyn, OH 44114

RE: MUR 3558

Dear Mr. Coyne:

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 3558. 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.

24043564180

Mr. James Coyne
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (ogxm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

24743564101



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

Ms. Ruth J. Coyne
6620 Glencoe Avenue
Brooklyn, Ohio 44144

RE: MUR 3558

Dear Ms. Coyne:

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 3558. 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.

24043564182

Ms. Ruth J. Coyne
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (Bjxm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564183



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

Ms. Maryann Merce
8060 North Hills Drive
Broadview Heights, Ohio 44147

RE: MUR 3558

Dear Ms. Merce:

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 3558. 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.

94043564184

Ms. Maryann Merce
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (B2XM)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564185



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 23, 1992

Mr. Robert J. Mickey
6252 Brookside Drive
Brooklyn, Ohio 44144

RE: MUR 3558

Dear Mr. Mickey:

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 3558. 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.

94743564106

Mr. Robert J. Mickey
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein

Lisa E. Klein
Assistant General Counsel

Enclosures

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

24043564187



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

July 23, 1992

Mr. Joseph Pucci
10206 Biddulph Road
Brooklyn, Ohio 44144

RE: MUR 3558

Dear Mr. Pucci:

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 3558. 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.

94043564188

Mr. Joseph Pucci
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (b2km)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564189



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

Ms. Pamela J. Krickler
6279 Drawing Road
Brooklyn, Ohio 44144

RE: MUR 3558

Dear Ms. Krickler:

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 3558. 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.

94043564190

Ms. Pamela J. Krickler
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (b2xm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564191



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

July 23, 1992

Ms. Sandra L. Maloney
4740 Autumn Lane
Brooklyn, Ohio 44144

RE: MUR 3558

Dear Ms. Maloney:

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 3558. 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.

24043564192

Ms. Sandra L. Maloney
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (638m)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

24043564193



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 23, 1992

Ms. Candace R. Vitas
252 Gayle Drive
Sheffield Lake, Ohio 44054-1913

RE: MUR 3558

Dear Ms. Vitas:

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 3558. 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.

94043564194

Ms. Candace R. Vitas
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (by XM)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564195



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

July 23, 1992

Ms. Debra J. Dixon
144 N. Beacon Street, #4A
Brighton, Massachusetts 02135

RE: MUR 3558

Dear Ms. Dixon:

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 3558. 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.

24043564196

Ms. Debra J. Dixon
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (Gykm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564197



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

Mr. James Dixon, Jr.
1215 Ramona Avenue
Lakewood, Ohio 44107

RE: MUR 3558

Dear Mr. Dixon:

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 3558. 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.

24043564198

Mr. James Dixon, Jr.
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (b2 km)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564199



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

Mr. Peter Luckianow
4691 Ridge Road
Brooklyn, Ohio 44144

RE: MUR 3558

Dear Mr. Luckianow:

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 3558. 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.

24043564200

Mr. Peter Luckianow
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (b2 km)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564201



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

Ms. Lois Pucci
10206 Biddulph Road
Brooklyn, Ohio 44144

RE: MUR 3558

Dear Ms. Pucci:

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 3558. 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.

24043564202

Ms. Lois Pucci
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein

Lisa E. Klein
Assistant General Counsel

Enclosures

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

24043564203



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 23, 1992

Ms. Marlene Rain
1005 Oak Street
Medina, Ohio 44256

RE: MUR 3558

Dear Ms. Rain:

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 3558. 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.

24043564204

Ms. Marlene Rain
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (62xm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564205



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 23, 1992

Ms. Jeanette Coyne
7130 Stone Road
Medina, Ohio 44256

RE: MUR 3558

Dear Ms. Coyne:

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 3558. 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.

94043564206

Ms. Jeanette Coyne
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (by KM)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564207



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 23, 1992

Ms. Penny J. Dixon
1215 Ramona Avenue
Lakewood, Ohio 44107

RE: MUR 3558

Dear Ms. Dixon:

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 3558. 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.

24043564208

Ms. Penny J. Dixon
Page 2

If you have any questions, please contact Veronica M. Gillespie, the attorney 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,

Lisa E. Klein (borm)

Lisa E. Klein
Assistant General Counsel

Enclosures

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

94043564209

STOKES FOR CONGRESS COMMITTEE

P.O. BOX 99358
CLEVELAND, OHIO 44199

Russell T. Adrine
Chairman

August 7, 1992

Brand and Lowell
Attorneys at Law
923 15th Street, N.W.
Washington, DC 20005
Attn: Stan Brand

92 AUG 10 AM 10:03

RECEIVED
FEDERAL ELECTION COMMISSION

Dear Stan:

Re: MUR 3558
Louis Stokes for Congress Committee
and Cheryle A. Wills, as treasurer

I enclose herewith all of the papers related to the above captioned complaint, including the form designating your law firm as Counsel for the Respondent.

I have contacted Ms. Veronica M. Gillespie at the Federal Election Commission for the purpose of acquiring an extension of the fifteen day rule. I advised her that while the letter from the Federal Election Commission transferring the complaint is dated July 23, 1992, it was just received by me a few days ago. I did not go into Cleveland until after the Democratic National Convention which I attended in New York. I also advised Ms. Gillespie that Ms. Cheryle A. Wills is not our current treasurer. The current treasurer is Eugene Pearson, who is designated as respondent on the Designation of Respondent form.

In requesting an extension of time in this matter, Ms. Gillespie advised when you have received the Designation of Counsel form from me, you should fax a copy to her and that if you call her, she will arrange an appropriate extension of time with you.

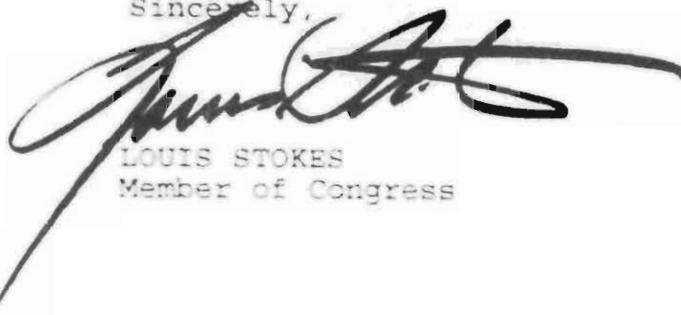
I am also enclosing herewith a copy of the transcription of taped recording of the press conference held by Ed Gudenat at the time he publicly announced his intention to file this complaint. As I advised you, Ed Gudenat is my opponent in the General Election in the Eleventh Congressional District of Ohio.

94043564210

Attorney Stan Brand
August 7, 1992
Page Two

I would appreciate hearing from you after you have had an opportunity to study these materials.

Sincerely,

A handwritten signature in black ink, appearing to read "Louis Stokes", written over a rectangular area.

LOUIS STOKES
Member of Congress

LS/jl
Enclosures

24043564211

OGC 6039

STOKES FOR CONGRESS COMMITTEE

P.O. BOX 99358
CLEVELAND, OHIO 44199

Russell T. Adrine
Chairman

RECEIVED
FEDERAL ELECTION COMMISSION
92 AUG 10 AM 10:03

August 7, 1992

Ms. Veronica M. Gillespie
Office of the General Counsel
Federal Election Commission
Washington, DC 20463

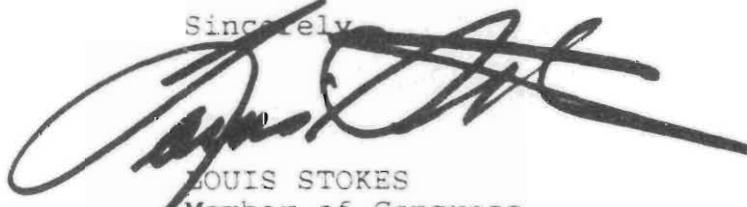
Re: MUR 3558
Louis Stokes for Congress Committee
and Cheryle A. Wills, as treasurer

Dear Ms. Gillespie:

In accordance with our telephone conversation of this date relative to the above captioned matter, I am enclosing herewith a copy of a letter dated April 25, 1991 in which Mr. Eugene Pearson advised the Clerk, U.S. House of Representatives that Ms. Cheryle Wills resigned as treasurer of the Louis Stokes for Congress Committee, effective April 1, 1991, and that he has taken her place as treasurer.

Also pursuant to our telephone conversation, I have forwarded the complaint in this matter to Attorney Stan Brand. A copy of this letter of transmittal is enclosed herewith.

Sincerely,



LOUIS STOKES
Member of Congress

LS/jl
Enclosure

24043564212

STOKES FOR CONGRESS COMMITTEE

P.O. BOX 99358

CLEVELAND, OHIO 44119

Russell T. Adrise
Chairman
Cheryle Wills
Treasurer

April 25, 1991

Clerk
U. S. House of Representatives
1036 Longworth HOB
Washington, D.C. 20515

RE: Louis Stokes for Congress
Committee
FEC ID #C00046995
October Quarterly, 12 Day
Pre-General, 30 Day Post-
General & Year End Reports

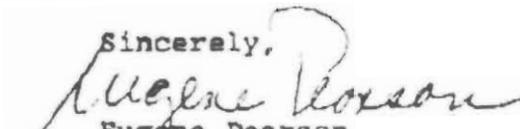
Dear Sir:

In accordance with letter dated April 11, 1991 from the Federal Elections Commission concerning the above, enclosed please find Amended Reports.

In regard to the excessive contribution made as indicated in the 30 Day Post-General Report, the Committee has notified the recipient and expect a refund shortly, which will be included in the report covering the period of receipt.

Additionally, this letter is to notify you of a change in the officers of this Committee. Mrs. Cheryle Wills resigned effective April 1, 1991 and the undersigned has taken her place, and we have added Mr. Linton Freeman as Financial Secretary.

Should you have any questions or need additional information, please contact me.

Sincerely,

Eugene Pearson
Treasurer

EP/jg
Enclosures

cc: The Honorable Robert Taft
Secretary of State

RECEIVED
FEDERAL ELECTION COMMISSION
92 AUG 10 AM 10:03

24043564213

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3558

NAME OF COUNSEL: BRAND AND LOWELL, ATTYS AT LAW

ADDRESS: ATTN. STAN BRAND
923 15TH ST. N.W.
WASHINGTON, D.C. 20005

TELEPHONE: (202) 662-9700

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.

8/7/92
Date

Louis Stokes For Congress
Committee

Signature

* FOR Cheryl A. Wills, Treasurer
and Eugene Pearson

RESPONDENT'S NAME: EUGENE PEARSON, TREASURER

ADDRESS: LOUIS STOKES FOR CONGRESS COMMITTEE
P.O. Box 99358

CLEVELAND, OHIO 44199

HOME PHONE: (216) 561-9432

BUSINESS PHONE: (216) 443-8628

* PLEASE NOTE THAT Cheryl A. Wills
IS NO LONGER TREASURER FOR THE LOUIS
STOKES FOR CONGRESS COMMITTEE. MR. EUGENE
PEARSON IS THE CURRENT TREASURER.

74043564214

OGC 6071

BRAND & LOWELL

A PROFESSIONAL CORPORATION
923 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE: (202) 662-9700
TELECOPIER: (202) 737-7565

August 11, 1992

BY HAND DELIVERY

Veronica Gillespie, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3558

Dear Ms. Gillespie:

As you know, we represent the Louis Stokes for Congress Committee and its treasurer, respondents in the above-captioned matter under review.

We transmitted the relevant designation of counsel form to you yesterday and thereupon requested, and were granted, an extension of time until August 26, 1992, to file a submission in response to the complaint. We also transmit under this cover the original designation of counsel form, which we "faxed" to you yesterday.

Thank you very much for accommodating our and the Committee's needs and schedules in granting the extension of time.

Sincerely,


David E. Frulla

Attachment

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
92 AUG 11 AM 9:26

24043564215



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 12, 1992

David E. Frulla, Esq.
Brand & Lowell
923 15th Street, N.W.
Washington, D.C. 20005

RE: MUR 3558
Louis Stokes for Congress Committee and
Eugene Pearson, as treasurer

Dear Mr. Frulla:

This is in response to your letter dated August 11, 1992, which we received on the same date, requesting an extension of 15 days until August 26, 1992 to file a response in the above-referenced matter. The Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on August 26, 1992.

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

Sincerely,

A handwritten signature in cursive script that reads "Veronica M. Gillespie".

Veronica M. Gillespie
Attorney

24043564216

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FIFTEENTH STREET N.W. • WASHINGTON, D.C. 20005-2011 • (202) 625-6000

ROBERT F. BAUER
(202) 434 1602

August 10, 1992

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

Re: MUR 3558: On behalf of John Coyne,
Mary Coyne, Debra Dixon,
James Dixon, Jr., Penny Dixon,
Pamela Krickler, Sandra Maloney,
Maryann Merce

Dear Ms. Klein:

This letter seeks an extension of time on behalf of the Respondents here identified, to respond to the Commission's notification of reason to believe in Matter Under Review 3558.

The number of Respondents are many, and interviews and relevant information involving each one must be scheduled. Vacation schedules in the month of August add to the difficulty of completing responses without an extension. Also, some apparent Respondents who have changed addresses have yet to receive their notifications which were no doubt directed to their previous residences.

Moreover, it may appear upon further inquiry that certain Respondents will require separate counsel. In the meantime, they have agreed to allow Perkins Coie to act on their behalf for the purpose of obtaining an extension of time.

For these reasons, I would request an extension of time, until September 30, 1992, at which time responses on behalf of these Respondents will be filed with the Commission by the

92 AUG 12 PM 6:29
FEDERAL ELECTION COMMISSION

94043564217

Federal Election Commission
August 10, 1992
Page 2

undersigned (or should it be necessary, the undersigned and other counsel).

Very truly yours,



Robert F. Bauer
Counsel to Mayor John Coyne

RFB:smb

94043564218



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 27, 1992

Robert F. Bauer, Esq.
Perkins Coie
607 14th Street, N.W.
Suite 800
Washington, D.C. 20005-2011

RE: MUR 3558

Dear Mr. Bauer:

This is in response to your letter dated August 10, 1992, which we received on August 12, 1992, requesting an extension until September 30, 1992, to file a response in the above-referenced matter. After our telephone conversation on August 25, 1992, in which you agreed to shorten your request and after considering all the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension for 30 days. Accordingly, your response is due by the close of business on September 10, 1992.

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

Sincerely,

Veronica M. Gillespie
Veronica M. Gillespie
Attorney

24043564219

OGC 6101

BRAND & LOWELL

A PROFESSIONAL CORPORATION
923 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE: (202) 662-9700
TELECOPIER: (202) 737-7565

August 14, 1992

BY HAND DELIVERY

Veronica Gillespie, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

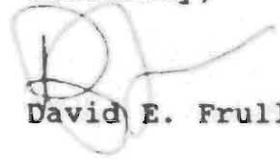
Re: MUR 3558

Dear Ms. Gillespie:

As you know, we represent the Louis Stokes for Congress Committee and its treasurer, respondents in the above-captioned matter under review. We enclose the original designation of counsel form which we "faxed" to you yesterday.

Please do not hesitate to contact me with questions or comments.

Sincerely,



David E. Frulla

DEF:ldm
Enclosure

24043564220

92 AUG 14 AM 11:22
RECEIVED
GENERAL COUNSEL
FEDERAL ELECTION COMMISSION

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3558

NAME OF COUNSEL: ATTORNEY STAN BRAND

ADDRESS: BRAND & LOWELL

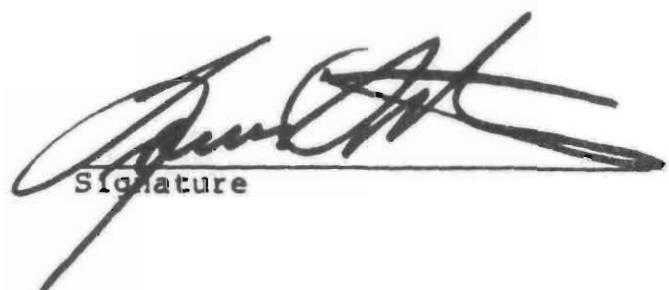
923 15TH STREET, N.W.

WASHINGTON, DC 20005

TELEPHONE: 202/662-9700

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.

AUGUST 12, 1992
Date


Signature

RESPONDENT'S NAME: HONORABLE LOUIS STOKES

ADDRESS: 11924 VIEWCREST TERRACE

SILVER SPRING, MD 20902

HOME PHONE: 301/593-1344

BUSINESS PHONE: 202/225-7032

24043564221



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 19, 1992

David E. Frulla, Esq.
Brand & Lowell
923 15th Street, N.W.
Washington, D.C. 20005

RE: MUR 3558
Congressman Louis Stokes

Dear Mr. Frulla:

This is in response to your telephone call and letter dated August 14, 1992, which we received on the same date, requesting an extension of 15 days until August 26, 1992 to file a response in the above-referenced matter on behalf of Congressman Louis Stokes. The Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on August 26, 1992.

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

Sincerely,

Veronica M. Gillespie

Veronica M. Gillespie
Attorney

94043564222

WEILER & WEILER

ATTORNEYS AT LAW
8920 BRECKSVILLE ROAD
BRECKSVILLE, OHIO 44141

RECEIVED
FEDERAL ELECTION
COMMISSION
HALL ROOM

Aug 21 8 53 AM '92

(216) 526-0876
FAX: (216) 526-4314

Kevin P. Weiler
Jennifer P. Weiler
Cheri L. Westerburg

August 18, 1992

Federal Election Commission
Office of General Counsel
Veronica M. Gillespie
Washington, D. C. 20463

RE: MUR 3558

Dear Ms. Gillespie:

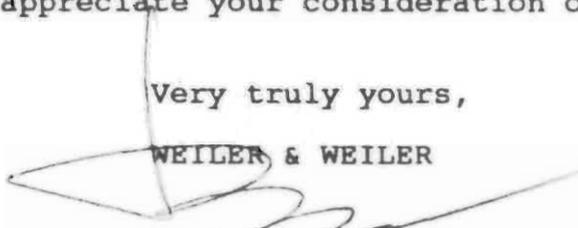
Please be advised that the undersigned represents Brenda S. Hartel (n.k.a. Rolland), Jeanie Joyce and Robert J. Mickey relative to the above-entitled case.

Confirming my telephone conversation with you on this date, August 18, 1992, please accept this as my formal request for filing my clients' response to be extended to August 28, 1992.

I sincerely appreciate your consideration of this request.

Very truly yours,

WEILER & WEILER


Kevin P. Weiler

KPW/sce

RECEIVED
FEDERAL ELECTION
COMMISSION
92 AUG 21 PM 3:22

94043564223

WEILER & WEILER

ATTORNEYS AT LAW
8920 BRECKSVILLE ROAD
BRECKSVILLE, OHIO 44141

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

AUG 21 10 54 AM '92

(216) 526-0876
FAX: (216) 526-4314

Kevin P. Weiler
Jennifer P. Weiler
Cheri L. Westerburg

August 18, 1992

Federal Election Commission
Office of General Counsel
Veronica M. Gillespie
Washington, D. C. 20463

RE: MUR 3558

Dear Ms. Gillespie:

Please be advised that the undersigned represents Brenda S. Hartel (n.k.a. Rolland), Jeanie Joyce and Robert J. Mickey relative to the above-entitled case. I am enclosing herein fully executed authorizations by said clients regarding such representation.

The complaint in question appears to have been filed by Edmund V. Gudenas of a group known as "Citizens for a Bright Light". In his complaint, Mr. Gudenas is charging that, among other things, my clients somehow were coerced or used as a conduit for campaign contributions to the Louis Stokes for Congress Committee.

I have spoken with my clients regarding this matter. All of my clients are employees of Westbrook Village Apartments. Westbrook Village Apartments is owned by a partnership consisting of Zaremba Builders, George Zane, and the Michael Hearn Trust, John M. Coyne, Co-Trustee. John M. Coyne has no equitable ownership in the Trust or Westbrook Village Apartments. As a practical matter, George Zane is the immediate manager of this particular organization.

My clients relate to me that Mr. Bob Mickey has an interest in the Louis Stokes campaign since Mr. Stokes is apparently a member of a number of committees involved in appropriations to the National Aeronautics and Space Administration (N.A.S.A.) as well as to the Veterans Administration (V.A.). Mr. Mickey is a disabled veteran. Moreover, his son Steve, as a student (and now an honors graduate) of Cornell University in Aeronautical engineering, has previously worked for N.A.S.A on a part-time basis and will be working full-time in the future. In addition, another employee of Westbrook Village Apartments who was mentioned as a contributor (although, apparently, not charged in this

92 AUG 21 PM 3:19

RECEIVED
FEDERAL ELECTION COMMISSION

74043564224

Page Two
August 18, 1992

matter), Paulette C. Higgins, has a brother-in-law who works for N.A.S.A. Accordingly, she also was particularly interested in Mr. Stokes campaign and encouraged my clients' donations.

Contrary to the campaign report, Brenda S. Hartel (n.k.a. Rolland) did not donate \$1,000.00 on two occasions but only on one occasion in August of 1990. The campaign report is also incorrect in that the donations were not all made on August 31, 1990 but were made on various dates, to-wit: August 3, 1990, August 4, 1990, and August 7, 1990. We suspect that the contributions were all dated as August 31, 1990 since the campaign committee apparently kept their books on a monthly basis. Alternatively, it may be that their checks were submitted on August 31, 1990. My clients do indicate to me that the checks were given to Mr. Coyne since he is the local Democratic Party Chairman and since he is acquainted with my clients. He was thus in a position to drop off the funds.

My clients all indicate to me that under no circumstances did Mr. Coyne ever request them to make these donations. The suggestion originally came from Robert Mickey and the money came from our clients' personal funds. My clients' position is substantiated by the enclosed affidavits which I have prepared.

We would request that the Federal Elections Commission consider this information and dismiss any complaints against our clients.

This letter also confirms my conversation with you on August 18, 1992 wherein you agreed, subject to the approval of the Commission, to extend the response date to August 28, 1992. I am grateful to you for your indulgence in this matter and for the record would specifically reaffirm my request that the Commission approve such extension.

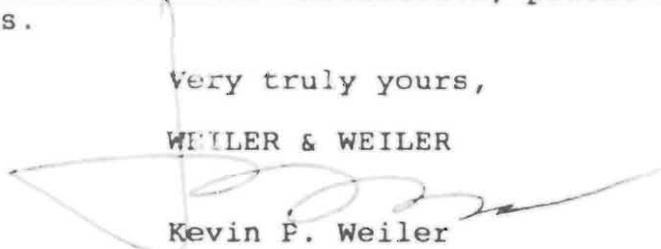
24043564225

Page Three
August 18, 1992

If we can provide further information, please do not
hesitate to contact us.

Very truly yours,

WEILER & WEILER



Kevin P. Weiler

KPW/sce
Enclosures

94043564226

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3558

NAME OF COUNSEL: Kevin P. Weiler

ADDRESS: 8920 Brecksville Road

Brecksville, Ohio 44141

TELEPHONE: (216)526-0876

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.

8-18-92
Date

Jessie Joyce
Signature

RESPONDENT'S NAME: JEANIE JOYCE

ADDRESS: 3619 W. 148

CLEVELAND OHIO 44111

HOME PHONE: 252-7639

BUSINESS PHONE: 623-5100

94043564227

92 AUG 21 PM 3:19
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK

STATE OF OHIO)
) SS.
COUNTY OF CUYAHOGA)

AFFIDAVIT

52 AUG 21 PM 3:20

Jeanie Joyce, being first duly sworn according to law, deposes and states as follows:

1. That I am a citizen and voter of the United States of America;

2. That I have been identified as a campaign contributor to the Louis Stokes for Congress Committee by one Edmund V. Gudenas in reference to a complaint filed by said Edmund V. Gudenas before the Federal Elections Commission;

3. That a co-worker, Robert Mickey, suggested a contribution to the Louis Stokes for Congress Committee in 1990. Such request was based upon Mr. Mickey's support of Louis Stokes in his activities on committees involving appropriations for N.A.S.A. (with which his son is affiliated) and the Veteran's Administration (Mr. Mickey is a veteran);

4. That I also became interested in Mr. Stokes through my co-worker Paulette Higgins whose brother-in-law is affiliated with N.A.S.A.;

5. That all contributions made by me to the Louis Stokes for Congress Committee were made of my own free will and under no coercion or compulsion of any kind by any person;

6. That the funds for campaign contributions to the Louis Stokes for Congress Committee given by me came from my own

94043564228

funds and that at no time was I provided funds or reimbursed or otherwise received any consideration, including but not limited to salary adjustment or personal debt reimbursement, by John M. Coyne, the City of Brooklyn, or the Cuyahoga County Democratic Party for said campaign contributions;

7. That I am an acquaintance of John M. Coyne but am not a relative or employee of John M. Coyne;

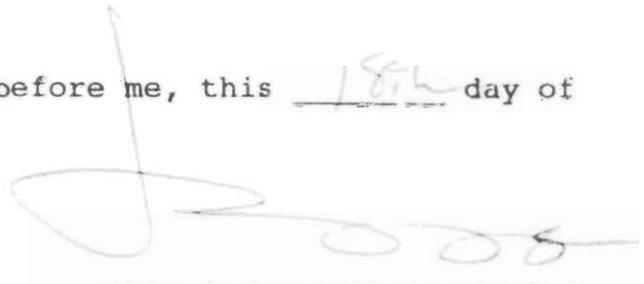
8. That at no time was the campaign contribution made under any threat or promise of employment or termination of employment on the part of my employer nor was any campaign contribution made by me ever required as a condition of my employment; and

9. That I made the said campaign contribution of my own free will and based upon my desire to support the re-election of Congressman Louis Stokes.

FURTHER AFFIANT SAYETH NAUGHT.



SWORN TO and subscribed before me, this 18th day of August, 1992.



NOTARY PUBLIC
KEVIN PATRICK WEIGER
Notary Public for State of Ohio
My commission has no expiration

94043564229

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3558

NAME OF COUNSEL: Kevin P. Weiler

ADDRESS: 8920 Brecksville Road

Brecksville, Ohio 44141

TELEPHONE: (216)526-0876

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.

8/18/92
Date

Brenda B. Hartel (N.K.A. Pollard)
Signature

RESPONDENT'S NAME: Brenda B. Hartel (N.K.A. Pollard)

ADDRESS: 6903 Whetstone Ave.
Parma, Ohio 44129

HOME PHONE: (216) 842-6537

BUSINESS PHONE: (216) 749-0390

94043564230

STATE OF OHIO)
) SS. AFFIDAVIT
COUNTY OF CUYAHOGA)

92 AUG 21 PM 3:20

FEDERAL RECEIVED
FEDERAL ELECTIONS COMMISSION

Brenda S. Hartel (n.k.a. Rolland), being first duly sworn according to law, deposes and states as follows:

1. That I am a citizen and voter of the United States of America;

2. That I have been identified as a campaign contributor to the Louis Stokes for Congress Committee by one Edmund V. Gudenas in reference to a complaint filed by said Edmund V. Gudenas before the Federal Elections Commission;

3. That a co-worker, Robert Mickey, suggested a contribution to the Louis Stokes for Congress Committee in 1990. Such request was based upon Mr. Mickey's support of Louis Stokes in his activities on committees involving appropriations for N.A.S.A. (with which his son is affiliated) and the Veteran's Administration (Mr. Mickey is a veteran);

4. That I also became interested in Mr. Stokes through my co-worker Paulette Higgins whose brother-in-law is affiliated with N.A.S.A.;

5. That all contributions made by me to the Louis Stokes for Congress Committee were made of my own free will and under no coercion or compulsion of any kind by any person;

6. That the funds for campaign contributions to the Louis Stokes for Congress Committee given by me came from my own

74043564231

24043564232

funds and that at no time was I provided funds or reimbursed or otherwise received any consideration, including but not limited to salary adjustment or personal debt reimbursement, by John M. Coyne, the City of Brooklyn, or the Cuyahoga County Democratic Party for said campaign contributions;

7. That I am an acquaintance of John M. Coyne but am not a relative or employee of John M. Coyne;

8. That at no time was the campaign contribution made under any threat or promise of employment or termination of employment on the part of my employer nor was any campaign contribution made by me ever required as a condition of my employment; and

9. That I made the said campaign contribution of my own free will and based upon my desire to support the re-election of Congressman Louis Stokes.

FURTHER AFFIANT SAYETH NAUGHT.

Brenda L. Whittel
(N.K.A. Holland)

SWORN TO and subscribed before me, this 18th day of August, 1992.

Kevin Patrick Sawyer
NOTARY PUBLIC

KEVIN PATRICK SAWYER
Notary Public for State of Ohio
My commission has no expiration date

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3558

NAME OF COUNSEL: Kevin P. Weiler

ADDRESS: 8920 Brecksville Road
Brecksville, Ohio 44141

TELEPHONE: (216)526-0876

FEDERAL RECEIVED
92 AUG 21 PM 3:20
COMMISSION

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.

8-18-92
Date

Robert J. Mckeef
Signature

RESPONDENT'S NAME:

ADDRESS:

HOME PHONE:

BUSINESS PHONE:

Robert J. Mckeef
6252 Brookside Tr.
Cleveland, Ohio
44144
351-7663
None

24043564233

STATE OF OHIO)
) SS.
COUNTY OF CUYAHOGA)

AFFIDAVIT

92 AUG 21 PM 3:20

FEDERAL ELECTIONS COMMISSION

Robert Mickey, being first duly sworn according to law, deposes and states as follows:

1. That I am a citizen and voter of the United States of America;

2. That I have been identified as a campaign contributor to the Louis Stokes for Congress Committee by one Edmund V. Gudenas in reference to a complaint filed by said Edmund V. Gudenas before the Federal Elections Commission;

3. That I suggested a contribution to the Louis Stokes for Congress Committee to various Westbrook personnel in 1990. I support Louis Stokes in his activities on committees involving appropriations for N.A.S.A. (with which my son is affiliated) and the Veteran's Administration (I am a veteran);

4. That all contributions made by me to the Louis Stokes for Congress Committee were made of my own free will and under no coercion or compulsion of any kind by any person;

5. That the funds for campaign contributions to the Louis Stokes for Congress Committee given by me came from my own funds and that at no time was I provided funds or reimbursed or otherwise received any consideration, including but not limited to salary adjustment or personal debt reimbursement, by John M. Coyne, the City of Brooklyn, or the Cuyahoga County Democratic

94043564234

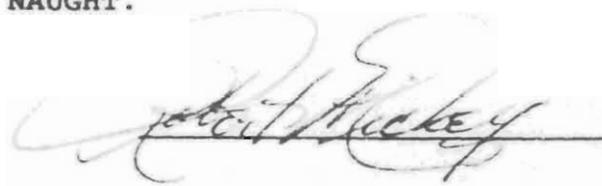
Party for said campaign contributions;

6. That I am an acquaintance of John M. Coyne but am not a relative or employee of John M. Coyne;

7. That at no time was the campaign contribution made under any threat or promise of employment or termination of employment on the part of my employer nor was any campaign contribution made by me ever required as a condition of my employment; and

8. That I made the said campaign contribution of my own free will and based upon my desire to support the re-election of Congressman Louis Stokes.

FURTHER AFFIANT SAYETH NAUGHT.



SWORN TO and subscribed before me, this 18th day of

August, 1992.



NOTARY PUBLIC
KEVIN PATRICK WICKERT
Notary Public for State of Ohio
His commission has no expiration date

24043564235



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 21, 1992

Kevin P. Weiler, Esq.
Weiler & Weiler
8920 Brecksville Road
Brecksville, Ohio 44141

RE: MUR 3558

Dear Mr. Weiler:

This is in response to your Fax dated August 18, 1992, which we received on the same date, requesting an extension of 10 days until August 28, 1992 to file a response in the above-referenced matter. After considering all the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension for 10 days. Accordingly, your response is due by the close of business on August 28, 1992.

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

Sincerely,

Veronica M. Gillespie
Veronica M. Gillespie
Attorney

94043564236

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

BRAND & LOWELL

A PROFESSIONAL CORPORATION
923 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

AUG 28 9 48 AM '92

TELEPHONE: (202) 662-9700
TELECOPIER: (202) 737-7565

August 25, 1992

BY FACSIMILE AND REGULAR MAIL

Veronica Gillespie, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3558

Dear Ms. Gillespie:

This is to confirm that you have graciously agreed to allow Respondents, Congressman Louis Stokes, the Stokes for Congress Committee, and the Committee's treasurer, an additional extension of time until August 31, 1992, to respond to the complaint in the above-referenced MUR. As I explained to you, we plan to submit an affidavit of the committee's former treasurer to the Commission, but the treasurer will be away from her house and office until August 27, 1992. Our submission was formerly due on August 26, 1992, the day before the treasurer's return.

Thank you very much for accommodating us with this brief further extension.

Sincerely,



David E. Frulla

DEF:ldm

74043564237

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
92 AUG 28 AM 10:31

This is the Sworn Statement of Edmund V. Gudenas ^{Aug 25} 9 28 AM '92

I, Edmund V. Gudenas am sending additional information regarding possible violations of the Federal Elections Campaign Act of 1971 by Louis Stokes.

This is regarding MUR 3558.

The City of Brooklyn, Ohio has provided the salary history of Maryann Merce, Pamela Krickler and Sandra Maloney. Each were mentioned in the original complaint. This attached salary history clearly shows that these three did not earn enough to make donations of thousands of dollars to Louis Stokes with their own money.

These were clearly questionable contributions. As a result, I am also asking you to investigate if Stokes followed the law on questionable contributions. Receiving thousands of dollars from people who could not afford it is certainly questionable.

Edmund V. Gudenas
Edmund V. Gudenas

Sworn to before me, a Notary Public in and for said County of Cuyahoga and State of Ohio, personally appeared the above named Edmund V. Gudenas who acknowledged that he did sign the foregoing statement and that the same is his free act and deed.

In testimony wherof, I have hereunto set my hand and official seal at Euclid, Ohio, this 18th day of August, 1992.

William R. Cervonek

Notary Public
WILLIAM R. CERVONEK
Notary Public, State of Ohio
Recorded in Cuyahoga County
My Comm. Expires 08-31-95

24943564238

RECEIVED
FEDERAL ELECTION
COMMISSION
WASHINGTON
92 AUG 26 AM 10:15

John M. Coyne
Mayor

CITY OF
BROOKLYN
OHIO

COUNCIL
John E. Frey
Paula A. Ritter
Kenneth P. Loen
Thomas E. Coyne
Daniel J. Enovitch
Gregory L. Frey
Rita M. Brown

7619 Memphis Avenue, Brooklyn, Ohio 44144-2197 • (216) 351-2133

"Home of the Seatbelt Law"

August 7, 1992

Rita Brown:

The following is a list of wages for the years 1985 through 1991 that you requested:

MARYANN MERCE - ADMINISTRATIVE ASSISTANT TO THE MAYOR

1985 - \$29,667.21
1986 - \$31,666.48
1987 - \$32,863.05
1988 - \$34,638.61
1989 - \$36,626.57
1990 - \$37,028.85 - \$1,000 to Louis Stokes
1991 - \$38,731.42

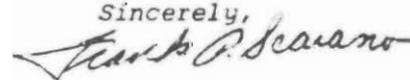
PAMELA KRICKLER - CLERK-PERSONNEL & RECORDS

1985 - \$23,359.37
1986 - \$24,376.39 - \$1,000 to Louis Stokes
1987 - \$25,551.71
1988 - \$27,551.92 - \$1,000 to Louis Stokes
1989 - \$21,595.83
1990 - \$28,767.54 - \$1,000 to Louis Stokes
1991 - \$30,134.58

SANDRA MALONEY - PART-TIME PERSONNEL FINANCE

1985 - \$ 1,723.93
1986 - \$ 4,783.28 - \$1,000 to Louis Stokes
1987 - \$ 4,472.19
1988 - \$ 4,925.07
1989 - \$ 4,733.82
1990 - \$ 5,866.02
1991 - \$10,632.53

Sincerely,



Frank P. Scarano
Finance Director

FPS/pp



This is the Sworn Statement of Edmund V. Gudenas

RE: MUR 3558

I, Edmund V. Gudenas believe that John M. Coyne, Mayor of Brooklyn, made an illegal contribution to the Louis Stokes campaign in 1986.

On 8/5/86 he donated \$1,000 to the Louis Stokes For Congress Committee and on 6/18/86 he donated \$1,000 to the Minority Business Friends Committee for Congressman Louis Stokes. Both committees were under the control of Louis Stokes and served only to elect him. As a result, \$2,000 was given by one individual to one Congressional campaign. I believe this is a violation and Congressman Stokes knew so at the time. This second donation should have been returned.


Edmund V. Gudenas

Sworn to before me, a Notary Public in and for said County of Cuyahoga and State of Ohio, personally appeared the above named Edmund V. Gudenas who acknowledged that he did sign the foregoing statement and that the same is his free act and deed.

In testimony whereof, I have hereunto set my hand and official seal at Euclid, Ohio, this 18th day of August, 1992.



Notary Public

WILLIAM R. CERVENK
Notary Public, State of Ohio
Recorded in Cuyahoga County
My Comm. Expires 08-31-95

24043564240

RECEIVED
FEDERAL RESERVE COMMISSION
92 AUG 26 AM 10:52

SCHEDULE A

UNRECORDED RECEIPTS

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

PAGE 7 OF 120
FOR LINE NUMBER 11a

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)

LOUIS STOKES FOR CONGRESS COMMITTEE

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Sidney Spector 23305 Chagrin Blvd. Beachwood, OH 44122	Senior Housing Associates	8/25/86	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Managing Partner	Aggregate Year-to-Date > \$ 250.00	
John M. Coyne 1296 West 6th Street Cleveland, OH 44113	Central Coordinating Services	8/5/86	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Owner	Aggregate Year-to-Date > \$ 1,500.00	
James M. Carney, Jr. 1710 Ohio Savings Plaza Cleveland, OH 44114	Carney & Broadbent	9/5/86	1,000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Attorney	Aggregate Year-to-Date > \$ 1,000.00	
Robert P. Madison 2339 North Park Blvd. Cleveland, OH 44106	Madison-Madison International	9/23/86	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Architect	Aggregate Year-to-Date > \$ 500.00	
R. S. Sondhe 114 Anglers Drive Chagrin Falls, OH 44022	Polycarb, Inc.	9/30/86	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: President	Aggregate Year-to-Date > \$ 550.00	
Manohar Daga 5507 Renee Drive Highland Heights, OH 44143	Dingus & Daga	9/30/86	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: CPA	Aggregate Year-to-Date > \$ 300.00	
Ramesh Y. Gavhane 9579 Shadow Hill Trail Chesterland, OH 44026	Arrow Fabricating Company	9/30/86	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: President	Aggregate Year-to-Date > \$ 300.00	

SUBTOTAL of Receipts This Page (optional) 8,450.00

TOTAL This Period (last page this line number only)

24043564241



Any information copied from such Reports or 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)

Minority Business Friends Committee for Congressman Louis Stokes

A. Full Name, Mailing Address and ZIP Code Marlie & Ann Roberts 16501 S. Woodland, Road Shaker Hts., Ohio 44120	Name of Employer Restauranteur	Date (month, day, year) 6/13/86	Amount of Each Receipt This Period \$300.00
	Occupation owners	Aggregate Year-to-Date-\$ 300.00	

Receipt For: Primary General
 Other (specify):

B. Full Name, Mailing Address and ZIP Code Robert Hisler 1010 Walnut, N.E. Canton, Ohio 44704	Name of Employer Robert Hisler & Associates	Date (month, day, year) 6/13/86	Amount of Each Receipt This Period \$200.00
	Occupation resident	Aggregate Year-to-Date-\$ 200.00	

Receipt For: Primary General
 Other (specify):

C. Full Name, Mailing Address and ZIP Code Mayor John M. Coyne 6620 Glencoe Ave. Brooklyn, Ohio 44114	Name of Employer Cuyahoga County Democratic Executive Committee	Date (month, day, year) 6/13/86	Amount of Each Receipt This Period \$1,000.00
	Occupation Chairperson	Aggregate Year-to-Date-\$ 1,000.00	

Receipt For: Primary General
 Other (specify):

D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date-\$	

Receipt For: Primary General
 Other (specify):

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date-\$	

Receipt For: Primary General
 Other (specify):

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date-\$	

Receipt For: Primary General
 Other (specify):

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	Aggregate Year-to-Date-\$	

Receipt For: Primary General
 Other (specify):

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only) \$4,400.00

24043564242



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

August 28, 1992

Mr. Edmund V. Gudenas
Citizens for a Bright Light
24555 Lakeshore Boulevard
Euclid, OH 44123

RE: MUR 3558

Dear Mr. Gudenas:

This letter acknowledges receipt on August 26, 1992, of the supplement to the complaint you filed on July 17, 1992, against the Louis Stokes for Congress Committee and Eugene Pearson, as treasurer, Louis Stokes, John M. Coyne, Mary Coyne, Kathleen M. Rolland, Paulette C. Higgins, Brenda S. Hartel, Jeanie Joyce, James Coyne, Ruth J. Coyne, Maryann Merce, Robert J. Mickey, Joseph Pucci, Pamela J. Krickler, Sandra L. Maloney, Candace R. Vitas, Debra J. Dixon, James Dixon, Jr., Peter Luckianow, Lois Pucci, Marlene Rain, Jeanette Coyne and Penny J. Dixon. The respondents will be sent copies of the supplement. You will be notified as soon as the Federal Election Commission takes final action on your complaint.

Sincerely,

Veronica M. Gillespie
Veronica M. Gillespie (by FEH)
Attorney

24043564243



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20461

August 28, 1992

David E. Frulla, Esquire
Brand & Lowell
923 15th Street, N.W.
Washington, DC 20005

RE: MUR 3558
Congressman Louis Stokes and
Louis Stokes for Congress
Committee and Eugene Pearson,
as treasurer

Dear Mr. Frulla:

On July 23, 1992, your clients were notified that the Federal Election Commission received a complaint from Edmund V. Gudenas alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your clients were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On August 26, 1992, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Veronica M. Gillespie
Veronica M. Gillespie
Attorney

Enclosure

94043564244



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 28, 1992

Robert Bauer, Esquire
Perkins Coie
607 14th Street N.W.
Washington, DC 20005

RE: MUR 3558
John M. Coyne, Mary Coyne,
Maryann Merce, Pamela J.
Krickler, Sandra L. Maloney,
Debra J. Dixon, James
Dixon, Jr. and Penny J. Dixon

Dear Mr. Bauer:

On July 23, 1992, your clients were notified that the Federal Election Commission received a complaint from Edmund V. Gudenas alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended. At that time your clients were given a copy of the complaint and informed that a response to the complaint should be submitted within 15 days of receipt of the notification.

On August 26, 1992, the Commission received additional information from the complainant pertaining to the allegations in the complaint. Enclosed is a copy of this additional information.

If you have any questions, please contact me at (202) 219-3400.

Sincerely,

Veronica M. Gillespie
Veronica M. Gillespie
Attorney

Enclosure

94043564245

GC6212
BRAND & LOWELL

A PROFESSIONAL CORPORATION
923 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE: (202) 662-8700
TELECOPIER: (202) 737-7565

August 31, 1992

BY HAND DELIVERY

Veronica Gillespie, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

92 AUG 31 PM 4:29

RECEIVED
FEDERAL ELECTION COMMISSION

Re: MUR 3558

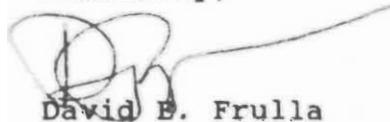
Dear Ms. Gillespie:

Enclosed please find the response of the Louis Stokes for Congress Committee, its treasurer, and Congressman Louis Stokes to the complaint that initiated the above-captioned matter under review.

Respondents also attach three affidavits (those of George Mazza, Jewell Gilbert, and Cheryle Wills Matthews) to their submission. They are submitting facsimile reproductions of the signature pages of each of the affidavits. The affiants are mailing the original signature pages to us, and we will submit them to the Commission as soon as they are received.

Please do not hesitate to call me if you have any questions.

Sincerely,



David E. Frulla

Enclosures

94043564246

AUG 31 PM 4:29

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

In the Matter of)	
)	
The Honorable Louis Stokes,)	Matter Under Review 3558
Louis Stokes for Congress)	
Committee, and)	
The Committee's Treasurer.)	

RESPONSE OF CONGRESSMAN LOUIS STOKES, THE LOUIS STOKES FOR CONGRESS COMMITTEE, AND THE COMMITTEE'S TREASURER DEMONSTRATING NO "REASON TO BELIEVE" EXISTS FOR THE COMMISSION TO PROCEED WITH THIS MUR

Congressman Louis Stokes, the Louis Stokes for Congress Committee (the "Stokes Committee"), and the Stokes Committee's treasurer¹ (collectively, "Respondents") are respondents in the above-captioned matter under review. MUR 3558 is based on a complaint dated July 14, 1992, filed by Mr. Edmund Gudenas ("Complainant"), one of Congressman Stokes's 1992 general election opponents. Mr. Gudenas's allegations pertain to the 1986, 1988, and 1990 election cycles.

Respondents hereby submit, pursuant to 2 U.S.C. § 437g(a), the following response and Affidavits of Cheryle Wills Matthews, George Mazzaro, and Jewell Gilbert demonstrating that the Commission should take no further action on the complaint. No "reason to believe" exists for the Commission to conclude that the Stokes Committee and its treasurer improperly accepted the

¹ Ms. Cheryle Wills Matthews (formerly Cheryle A. Wills) was the Stokes Committee's treasurer when the allegations herein arose. Ms. Matthews had been named a respondent solely in her official capacity. Mr. Eugene Pearson has succeeded Ms. Matthews as the Stokes Committee's treasurer.

24043564247

contributions involved in this complaint or that Congressman Stokes acted in any way contrary to the Federal Election Campaign Act ("FECA") or applicable regulations. Accordingly, Respondents respectfully submit the Commission should thus expeditiously dismiss the complaint pursuant to 11 C.F.R. § 111.9(b).

I. **FACTUAL BACKGROUND**

Congressman Stokes is an eleven-term Member and chairman of the House of Representatives Committee on Standards of Official Conduct.

Complainant is an independent, dark horse, general election opponent of Congressman Stokes. Complainant's political motives in filing this complaint are, unfortunately, abundantly evident. In fact, he convened a press conference to unveil his complaint at the Euclid, Ohio City Hall on July, 10, 1992 -- that is, the Friday before he apparently signed and transmitted it to the Commission. Exhibit 1 hereto includes a transcript of that press conference and documents Complainant's disregard of FECA's clear confidentiality requirements.² See 2 U.S.C. § 437g (a)(12) & 11 C.F.R. 111.21. The Affidavit of Jewell Gilbert (attached as Exhibit 2 to this submission) collects and verifies three recent newsclips from the Cleveland area which demonstrate that Mr. Gudenas has been able to employ FEC proceedings to generate

² Exhibit 1 is the Affidavit of George Mazzaro, verifying the transcript. The transcript itself is attached to Mr. Mazzaro's affidavit.

24043564248

publicity he hopes will assist his and damage Congressman Stokes's campaigns, respectively.³

Mr. Gudenas explained at the outset of his press conference that he or his operatives reviewed the Stokes Committee's FEC reports for the three prior election cycles to find something upon which to attempt to base an FEC complaint.

Reduced to essentials, Mr. Gudenas states that Brooklyn, Ohio mayor and prominent Cuyahoga County Democratic party leader John Coyne and certain persons Mr. Gudenas purports are associated with Mayor Coyne made facially permissible \$1,000 contributions to the Stokes Committee over a three year election cycle period. The contributors, as reflected in the Stokes Committee's FEC reports⁴, allegedly include individuals in Mr. Coyne's family, employed by the City of Brooklyn, and/or employed by business entities in which Mr. Coyne allegedly has an interest. Mr. Gudenas asserts the Coyne-related individuals are the only "ordinary people" who made contributions to the Stokes Committee, and that all the committee's other contributors are

³ Respondents both request and desire the Commission to discharge (as it consistently has adeptly done) its obligation to ensure that no further breaches of confidentiality occur, particularly as the general election draws nearer. The confidentiality provisions' legislative history explains they were designed to prevent the Commission's investigative powers from being used for partisan political purposes.

⁴ It should be noted that the Stokes Committee's painstakingly thorough (at least as far as those pages attached to the complaint) FEC reports comprise the basis for the complaint. All names, addresses, employers, and contribution amounts are listed for these contributors -- hardly the work of a committee bent on propagating or covering up a disguised contribution scheme.

94043564249

24043564250

"wealthy individuals" and special interest groups. Based on this massively sweeping generalization -- which even if true fails to state a violation of law -- Mr. Gudenas takes a leap of surmise to argue that contributions in question must have been reimbursed because the contributors could not have afforded to make them on their own. Such a reimbursement, if it occurred, would apparently be illegal under the FECA's contribution in the name of another prohibition. See 2 U.S.C. § 441f. Complainant has not made, nor can he on this record make, a direct allegation that any contribution was made from one of the four prohibited sources (corporation, labor organization, foreign national, or federal contractor).

II. QUESTION PRESENTED

The main issue presented involves whether the Stokes Committee and its treasurer should have, under applicable standards, questioned the contributions' legality and refunded them, either when they were accepted and deposited or upon later discovering evidence they were illegal. Federal campaign finance regulations delimit a campaign committee treasurer's obligation to review contributions in the following terms:

(b) The treasurer shall be responsible for examining all contributions received for evidence of illegality and for ascertaining whether contributions received, when aggregated with other contributions from the same contributor, exceed the contribution limits of 11 CFR 110.1 or 110.2.

(1) Contributions that present genuine questions as to whether they were made by corporations, labor organizations, foreign nationals, or Federal contractors may be, within ten days of the treasurer's receipt, either deposited into a campaign depository

under 11 CFR 103.3(a) or returned to the contributor. If any such contribution is deposited, the treasurer shall make his or her best efforts to determine the legality of the contribution If the contribution cannot be determined to be legal, the treasurer shall, within thirty days of the treasurer's receipt of the contribution, refund the contribution to the contributor.

(2) If the treasurer in exercising his or her responsibilities under 11 CFR 103.3(b) determined that at the time a contribution was received and deposited, it did not appear to be made by a corporation, labor organization, foreign national or Federal contractor, or made in the name of another, but later discovers it is illegal based on new evidence not available to the political committee at the time of receipt and deposit, the treasurer shall refund the contribution to the contributor within thirty days of the date on which the illegality is discovered

11 C.F.R. § 103.3(b) (emphasis added).

A campaign committee treasurer's obligations are thus two-fold: (1) to investigate a contribution when it is received if, at that time, a "genuine question" exists concerning whether it was made by a corporation, labor organization, foreign national, or federal contractor; and (2) to refund a contribution if newly discovered evidence shows a contribution actually "is" illegal. It should be noted that 11 C.F.R. 103.3(b)(1) recognizes that a contribution made in the name of another will not present a "genuine question" of legality when it is received and deposited. Such a contribution is camouflaged to prevent a treasurer from knowing it is made in the name of another. 11 C.F.R. Section 103.3(b)(1), accordingly, only addresses contributions that present a genuine issue concerning whether they were made from one of the four prohibited sources (i.e., a corporation, labor organization, foreign national, or Federal contractor).

94043564251

24043564252

The Stokes Committee and its treasurer and Congressman Stokes (insofar as these obligations can be imposed on him) have breached neither of the two obligations enumerated above. As will be explained below, no "genuine question" existed whether the contributions in question were made by any of the four prohibited sources when they were received and deposited. (Parenthetically, and apart from a campaign committee treasurer's expressly defined obligation under federal regulations, no "genuine question" was presented when the contributions were accepted and deposited whether they were made in the name of another.) Finally, no evidence has subsequently been unearthed, and Complainant provides none, to demonstrate these contributions are, in fact, illegal. For their part, Complainant's allegations comprise, at this juncture, only bare, politically motivated speculation. Thus, as will be demonstrated, no "reason to believe" exists that Respondents ran afoul of 11 C.F.R. Part 103.

Additionally, the FECA prevents a person from "knowingly" accepting or receiving a contribution in the name of another (2 U.S.C. § 441f), or from a corporation (2 U.S.C. § 441b(a)). No allegations are presented that any of the contributors were foreign nationals or that any federal contractor was conceivably involved in any of the allegations presented, so 2 U.S.C. §§ 441c and 441e are not implicated. No such knowing violation of 2 U.S.C. §§ 441f or 441b(a) occurred.

III. THE STOKES COMMITTEE AND ITS TREASURER WERE UNDER NO OBLIGATION TO INVESTIGATE OR REFUND THE CONTRIBUTIONS AT ISSUE HERE AND DID NOT OTHERWISE KNOWINGLY VIOLATE APPLICABLE FEDERAL CAMPAIGN FINANCE LAW AND REGULATIONS

The Affidavit of Cheryle Matthews (attached as Exhibit 3 to this submission), then treasurer of the Stokes Committee, avers that she knew her obligation to screen contributions as treasurer of the Stokes Committee (Matthews Aff., ¶¶ 2), abided by that standard as a matter of policy and practice (*id.* at ¶¶ 4-5), and required her staff to do the same (*id.* at ¶¶ 3-5). Ms. Matthews then avers that:

[She] did not know when each such contribution was accepted and reported, nor . . . [has she] ever since been informed, otherwise come to learn or have any facts to indicate that any of the above contributions were illegal in that any was made by a corporation, labor organization, foreign national, federal contractor, or made in the name of the another⁵ [and that] . . .

[N]othing on the face of any of the checks comprising the contributions listed above or in the circumstances surrounding the making and receipt of any such contribution led . . . [her] to conclude that a genuine question existed as to the legality of any such contribution so as to necessitate investigative or corrective action pursuant to federal campaign finance regulations.

Matthews Aff., ¶¶ 7-8. The Stokes Committee and its treasurer thus properly accepted and did not refund the contributions.

No objective, surrounding circumstances should otherwise have led the Stokes Committee or its treasurer to conclude that a

⁵ In that the Stokes Committee's treasurer is charged by law with accepting and receiving contributions, Ms. Matthews's averment that she did not knowingly accept or receive a contribution in the name of another or from a prohibited source puts to rest the issue whether Respondents violated 2 U.S.C. §§ 441f or 441b(a), absent competent evidence to the contrary.

94043564253

24043564254

genuine issue was presented that any of the contributions in question were made from one of the four prohibited sources when any of the contributions in question were accepted or deposited.⁶ Individuals made each of the contributions in question. All such contributions were within applicable limits. Of the twenty-six contributors in question, only eight (over a six year period) even worked for a corporation. Unless the law is that employment by a corporation per se raises the implication of illegal corporate contributions, the fact of corporate employment cannot alone trigger treasurer obligations under the regulations. Ms. Matthews has averred that she knew of no circumstance surrounding the making or acceptance of these otherwise facially valid contributions that led her to entertain a genuine question as to whether they were made from one of the four prohibited sources or in the name of another.

Moreover, the Commission should not interpret its regulations so as to require a committee treasurer to question the bona fides of a contribution from each person whose occupation might lead a politically interested interloper to allege the contributor might not have been wealthy enough to afford the contribution. The obligation to "means test"

⁶ As explained above, Section 103.3(b)(1) does not extend to a contribution presenting a genuine issue if it was made by another. Nonetheless, arguments explaining why no genuine question existed when the contributions were accepted and deposited as to whether they were made from one of the four prohibited sources apply equally, if not with more force, to any argument that might be required to be made that no genuine question existed as to this latter issue.

94043564255

contributors Complainant urges, would impose unprecedented, unreasonable administrative burdens on campaign committee treasurers and on the Commission, as well. Indeed, such a "means testing" obligation would, from a practical standpoint, create standards of conduct that are impossible to administer consistently and risk offending contributors. For instance, must a treasurer question all contributions from students or spouses who work within the home?⁷ Would certain students or housewives or house-husbands be exempt from scrutiny because of their sur-names or their acquaintance with a treasurer? By contrast, should vice presidents of any corporation be presumed to be able to "max out?" Or, must a treasurer investigate an individual contributor who lists his or her occupation as the vice president of, for example, a lawn care company (as opposed to a Fortune 500 company) to ascertain how he or she could have "afforded" the contribution in question? Who in (as Complainant describes it) the "middle class" must a treasurer investigate? A treasurer's duty begins with the presumption that contributions are legal when made unless real questions exist to the contrary. The regime Complainant seeks would, without constitutional, statutory, or regulatory basis, reverse the presumption of

⁷ Both spouses may contribute separately even though only one has an income. See 11 C.F.R. § 110.1(i)(1). And, Commission regulations recognize the even minor children (most likely students) may make permissible political contributions. 11 C.F.R. § 110.1(i)(2). The plain fact is that spouse and children contributions are commonplace and unremarkable.

legality for a wide, undefined and undefinable segment of contributors and contributions.

Furthermore, contributions from individuals with family, personal, or business ties⁸ are, not unexpectedly, often made at or about the same time. The occurrence of such contributions thus does not -- absent independent, objective, contrary indicia of illegality -- raise a prima facie burden on a treasurer to inquire about their legality. Nor is it remarkable -- not to mention suspicious -- that certain of these contributions may have come from outside Congressman Stokes's district. If the Commission chooses to interpret its regulations to require a treasurer to investigate any contributions arriving in such a common fashion, it should do so publicly and in advance, through rulemaking.

Finally, the Stokes Committee and its treasurer have come under no obligation pursuant to 11 C.F.R. § 103.3(b)(2) to refund the contributions in question on the basis of newly discovered evidence. Simply put, no credible evidence has been presented that the contributions in question are, in fact, illegal. Mr. Gudenas's politically motivated surmise hardly rises to the level of fact. The Commission has imposed a duty to refund only in circumstances where wrongdoing clearly occurred and was

⁸ An individual's decision to build personal or business good will by making a contribution that another individual asks or directs the former individual to make does not implicate Section 441f or the FECA's or campaign finance regulations' other limitations and prohibitions (except as to the amount of any such contribution). See A.O. 1984-21.

94043564256

demonstrated with record evidence. For instance, in A.O. 1984-52, the Commission required Congressman Russo's campaign committee to refund contributions, finding that "the Criminal Information and guilty plea of the corporation" for making illegal contributions through its employees "constitute an adequate factual basis for concluding that the corporation should receive the refunds." No similar factual basis for a refund -- or for any supplemental, extra-regulation-based Stokes Committee investigation of the need therefor -- appears on this record.

IV. NO "REASON TO BELIEVE" EXISTS THAT CONGRESSMAN STOKES VIOLATED FEDERAL CAMPAIGN FINANCE LAW OR REGULATIONS

94043564257
Federal law and regulations cast the duty to accept and deposit contributions and to examine them for evidence of illegality upon the campaign committee's treasurer. Put differently, a candidate permissibly delegates these duties to his or her campaign committee's treasurer. As explained above, Ms. Matthews (the Stokes Committee treasurer for the time period at issue herein) was responsible for accepting and depositing contributions to the Stokes Committee, and stated in her affidavit that she had no basis upon which to conclude the contributions were illegal either when she received and deposited them or at some later date.

Yet, the Commission has named Congressman Stokes himself as a respondent, even though Complainant offered no basis to impose the treasurer's duties or obligations on Congressman Stokes. Indeed, in response to a pointed question from the audience at his press conference, Mr. Gudenas could point to no evidence that

RESPONSE TO COMPLAINT - Page 11

Congressman Stokes was involved in any wrongdoing, and could conjure up only the following inadequate basis to involve Congressman Stokes in this matter under review:

I guess he [Congressman Stokes] very well might say that I have never looked at my balance of my campaign funds and I don't know anything but I would say that doesn't make any sense Because those are forms he is responsible for. You wouldn't just have somebody file these forms and give him the legal obligation to tell the truth and not even look at them.

Mr. Gudenas is wrong. As explained above, federal regulations delegate the duty to investigate a questionable contribution to a candidate's campaign committee's treasurer, not the candidate himself or herself. That Ms. Matthews did her job properly should conclude this matter equally as to Congressman Stokes, absent specific, competent allegations of the Congressman's wrongdoing.

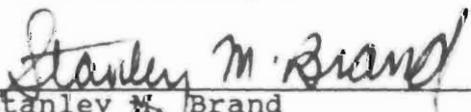
V. CONCLUSION

For the foregoing reasons, Respondents respectfully submit the Commission should expeditiously dismiss this matter under review as to all of them.

Dated: August 31, 1992

Respectfully submitted,

BRAND & LOWELL, P.C.


Stanley M. Brand
David E. Frulla
923 Fifteenth Street, N.W.
Washington, D.C. 20005
(202) 662-9700

Counsel for Respondents Louis Stokes, the Stokes for Congress Committee, and the Committee's Treasurer

94043564258

74043564259

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

In the Matter of
The Honorable Louis Stokes,
Louis Stokes for Congress
Committee, and
The Committee's Treasurer.

Matter Under Review 3558

AFFIDAVIT OF GEORGE MAZZARO

COUNTY OF CUYAHOGA
STATE OF OHIO

.SS

I, George Mazzaro, being duly sworn, depose and state as follows:

1. I am of full age, competent, and have personal knowledge of the facts to which I attest in this affidavit.
2. I attended the press conference held by Mr. Edmund Gudenas on July 10, 1992, at the Euclid, Ohio City Hall.
3. At that press conference, Mr. Gudenas announced that he planned to file a complaint against Congressman Louis Stokes with the Federal Election Commission. Mr. Gudenas made certain allegations against Congressman Stokes at the press conference and responded to certain question from members of the audience, including myself.
4. I often make cassette tape recordings of public meetings that I attend. Pursuant to this practice, I made a

94043564260

cassette tape recording of Mr. Gudenas's July 10, 1992, press conference.

5. My cassette tape recording of this press conference has been transcribed. The transcript is attached to this affidavit.

6. I have reviewed both the cassette tape and the attached transcript made therefrom.

7. Based on my review of the cassette tape and attached transcript, I attest that the transcript is a fair and accurate depiction of the proceedings of Mr. Gudenas's July 10, 1992, press conference at the Euclid, Ohio City Hall concerning his then imminent filing of a Federal Election Commission complaint against Congressman Stokes.

FURTHER AFFIANT SAYETH NOT.

George J. Mazzaro
George Mazzaro

Subscribed to and sworn before me this 27th day of August, 1992.

Edith J. Kreckal
Notary Public

My Commission Expires:

EDITH J. KRECKAL, Notary Public
State of Ohio, Cuyahoga County
My commission expires April 24, 1994

94043564261

(TRANSCRIBED FROM TAPE)

ED GUDENAS PRESS CONFERENCE 7/10/92

ED GUDENAS: ??? AND THEY SENT ME, I ASKED THEM TO GO BACK TO 1986, THE BASIC FORMS, EXPENSE AND CONTRIBUTIONS AND AFTER LOOKING AT THE FORMS A PATTERN QUICKLY DEVELOPED THAT ALL THE DONATIONS CAME FROM HIGHER SPECIAL INTEREST GROUPS OR VERY WEALTHY INDIVIDUALS REPRESENTING THEIR OWN SPECIAL INTERESTS EXCEPT IN ONE INCIDENT THERE WERE A GROUP OF ORDINARY PEOPLE WRITING \$1,000 DONATIONS WHERE THERE WERE NO OTHER ORDINARY PEOPLE THAT AT ANY TIME IN '91 OR '86 IN HIS DISTRICT THAT GAVE EVEN \$50 OR ANYTHING ELSE THAT WAS IN THE REPORT. THESE ORDINARY PEOPLE SUCH AS STUDENTS, SECRETARIES, CLERKS, HOUSEWIVES, WHO ALL WERE LISTED AS EACH GIVING CONGRESSMAN STOKES \$1,000 AT THE SAME TIME. THESE INDIVIDUALS WERE GIVING THESE DONATIONS OF \$1,000 AND THESE DONATIONS WERE COMING AT A TIME WHEN OTHER WEALTHY INDIVIDUALS WERE NOT GIVING THESE KIND OF DONATIONS WHERE THERE WERE NO FUNDRAISERS OR THERE WAS REALLY NO REASON TO JUST SUDDENLY SEND CONGRESSMAN STOKES \$1,000 AND THESE PEOPLE ALSO DID NOT LIVE IN THE DISTRICT THAT CONGRESSMAN STOKES REPRESENTED AND LOOKING AT IT A LITTLE BIT CLOSER SUDDENLY JOHN COYNE KEPT COMING UP AND THE CITY OF BROOKLYN KEPT COMING UP BECAUSE

94043564262

94043564263

MANY OF THESE PEOPLE WORKED FOR THE CITY OF BROOKLYN WHICH ALSO IS NOT IN THE DISTRICT AND SUDDENLY I REALIZED THAT EVERY SINGLE PERSON WAS LISTED AT A \$1,000 DONATION FOR LOUIS STOKES WAS DIRECTLY RELATED TO JOHN COYNE, MAYOR OF BROOKLYN AND CHAIRMAN OF CUYAHOGA COUNTY DEMOCRATIC PARTY AND THEY WERE PEOPLE RELATED TO MR. COYNE EITHER IN DIRECT RELATIONSHIP AS A RELATIVE, FRIEND, OR EMPLOYEE FOR HIS COMPANY CENTRAL COORDINATING SERVICES OR WORKED FOR THE CITY OF BROOKLYN. I BELIEVE THAT CONGRESSMAN STOKES ALWAYS KNEW THAT THESE DONATIONS WERE COMING FROM PEOPLE THAT DID NOT REALLY HAVE THIS KIND OF MONEY BECAUSE HE WOULD HAVE QUICKLY SEEN THAT AN UNEMPLOYED STUDENT COULD NOT SUPPORT A DONATION OF \$1,000. AN INCOME OF A RETIRED PERSON WHO IS A VALET FOR SOMEBODY COULD NOT AFFORD A DONATION OF \$1,000. THESE DONATIONS STOPPED RIGHT AROUND THE SAME TIME THE CENTRAL COORDINATING SERVICES COMPANY NO LONGER HAD THE EXCLUSIVE RIGHT TO SELL OR TO SELL THE AUTO TITLE BUSINESS IN CUYAHOGA COUNTY. WHAT I'M GOING TO DO, THE REASON I CALLED THIS CONFERENCE IS FILE A FORMAL COMPLAINT WITH THE FEDERAL ELECTIONS COMMISSION EARLY NEXT WEEK ASKING THEM TO RUN A COMPLETE INVESTIGATION ASKING THESE PEOPLE WAS IT TRULY THEIR MONEY THAT WENT TO

2
4
0
4
3
5
6
4
2
6
4

LOUIS STOKES. THEY WILL CONTACT EACH OF THESE INDIVIDUALS WITHIN A FEW DAYS AFTER RECEIVING A COMPLAINT AND THE PEOPLE HAVE ABOUT 15 DAYS TO RESPOND. THE PENALTY IS BOTH CIVIL AND CRIMINAL FOR THIS KIND OF VIOLATION BECAUSE YOU CANNOT MAKE A DONATION IN THE NAME OF ANOTHER PERSON WHEN IT'S NOT YOUR MONEY AND I THINK IT'S VERY SIGNIFICANT THAT THIS WAS HAPPENING BECAUSE LOUIS STOKES, ONE OF THE SENIOR MEMBERS OF CONGRESS, WAS VERY INSTRUMENTAL IN GETTING THESE LAWS PASSED AND MAINTAINED THROUGHOUT THE ALMOST FOUR DECADES HE'S BEEN IN CONGRESS. LOUIS STOKES HAS BEEN AGAINST CAMPAIGN REFORM LAWS BUT HAS BEEN IN FAVOR OF THE SAME SYSTEM WE HAVE TODAY--SPECIAL INTEREST MONEY--SO IF HE'S IN FAVOR OF THE SYSTEM, HE SHOULD BE HELD ACCOUNTABLE FOR FOLLOWING THE LAWS FOR THE SYSTEM HE IS IN FAVOR OF KEEPING. AND I THINK THAT THIS IS SIGNIFICANT AND CLEARLY SHOWS THAT LOUIS STOKES IS GETTING ALMOST ALL OF HIS MONEY FROM SPECIAL INTEREST GROUPS AND FROM VERY WEALTHY INDIVIDUALS AND NONE OF HIS MONEY FROM REGULAR PEOPLE IN THE DISTRICT. AND THAT'S THE BASIS FOR THIS CONFERENCE. ARE THERE ANY QUESTIONS?

UNIDENTIFIED FEMALE: WHEN DO YOU PLAN TO FILE THE COMPLAINT?

94043564265

GUDENAS: I HOPE ON MONDAY IT WILL BE SENT OUT, BUT JUST IN CASE THERE IS ANY LAST MINUTE THINGS THAT ARE NEEDED AND THEN FIVE DAYS LATER BY LAW, THEY'RE SUPPOSE TO SEND SOMETHING OUT TO THE INDIVIDUALS.

GEORGE MAZZARO: MR. GUDENAS, ON WHAT LEGAL AUTHORITY DO YOU USE PUBLIC PROPERTY TO PROMOTE YOUR CAMPAIGN?

GUDENAS: WELL ANYBODY, ANY FACILITY IN THE CITY OF EUCLID IS AVAILABLE AND I HAVE CONTACTED THE SERVICE OFFICE TO MAKE SURE THAT THIS WAS SO. ANY CITIZEN IS ALLOWED TO USE THIS FACILITY.

MAZZARO: THERE'S NO QUESTION ABOUT THAT, BUT BY WHAT LEGAL AUTHORITY DO YOU USE PUBLIC PROPERTY TO PROMOTE YOUR CAMPAIGN?

GUDENAS: I WAS TOLD FROM THE CITY OF EUCLID THAT YOU COULD CONTACT THE CITY AND ASK TO USE IT. AS FAR AS LEGAL AUTHORITY, YOU SHOULD PROBABLY ASK THE LAW DEPARTMENT. I CAN'T QUOTE YOU SECTION X, Y, Z PARAGRAPH 3.

MAZZARO: I WANT TO MAKE SURE YOU UNDERSTAND WHAT I'M SAYING. THE FACT IS YOU'RE RUNNING FOR CONGRESS. THE LAW PROHIBITS THE USE OF PUBLIC PROPERTY OR BUILDINGS FOR PERSONAL PROMOTION FOR ANY TYPE OF

CANDIDATE.

GUDENAS: I'M NOT FAMILIAR WITH THAT AT ALL.

MAZZARO: I KNOW ANYBODY CAN USE THIS BUILDING BUT NOT WHEN YOU'RE
RUNNING FOR OFFICE.

GUDENAS: MAY BE YOU SHOULD ASK ?? ABOUT THAT.

MAZZARO: JOHN PISCATELA SAID YOU COULD USE THIS BUILDING?

GUDENAS: YES, JOHN PISCATELA, NO I DIDN'T CONTACT HIM, I
CONTACTED HIS OFFICE TODAY ASKING TO USE THIS BUILDING.

MAZZARO: AS A CANDIDATE OR AS A COUNCILMAN?

GUDENAS: FOR A PRESS CONFERENCE, FOR THIS PURPOSE, AS A PRESS
CONFERENCE.

MAZZARO: FOR A PRESS CONFERENCE AS A CANDIDATE FOR CONGRESS? I
ASSUME YOU'RE REPRESENTING YOURSELF AS SUCH.

GUDENAS: I ASSUME THEY KNEW EXACTLY WHAT I WAS DOING. THEY KNOW
I AM A CANDIDATE FOR CONGRESS.

MAZZARO: OKAY BUT ARE YOU STANDING THERE TODAY AS A CANDIDATE FOR
CONGRESS?

GUDENAS: I'M STANDING HERE TODAY AS A CANDIDATE FOR CONGRESS, AS

94043564266

24043564267

A RESIDENT OF THE NEW 11TH CONGRESSIONAL DISTRICT, AS A PERSON WHO IS REPRESENTED BY LOUIS STOKES. ANY CITIZEN CAN MAKE A COMPLAINT TO THE FEDERAL ELECTION COMMISSION. YOU DON'T HAVE TO BE A CANDIDATE, YOU DON'T HAVE TO BE A COUNCILMAN, YOU DON'T HAVE TO BE ELECTED ANYTHING.

MAZZARO: BUT YOU HAVE YOUR BANNER UP AS ED GUDENAS ?? BRIGHT LIGHT WHICH IS YOUR CONGRESSIONAL CANDIDATE'S THEME, RIGHT?

GUDENAS: THAT IS MY THEME, YES.

MAZZARO: THANK YOU.

BOB BUTLER: ARE YOU MAKING CHARGES OR JUST FILING A COMPLAINT?

GUDENAS: I AM FILING, IT'S BASICALLY THE SAME, I'M FILING A COMPLAINT STATING THERE ARE ACTIVITIES THAT DID NOT FOLLOW THE LAW.

BUTLER: THEN YOUR SPECIFIC COMPLAINT IS THAT COYNE IS LAUNDERING MONEY TO STOKES CAMPAIGN.

GUDENAS: MY COMPLAINT IS THAT APPARENTLY MONEY IS COMING FROM COYNE INTO THE STOKES CAMPAIGN NOT MEETING ?? AND THAT THIS MONEY IS BEING FILTERED THROUGH THESE PEOPLE FOR THE STOKES CAMPAIGN. THAT IS THE COMPLAINT BEING FILED WITH THE FEDERAL ELECTION COMMISSION.

BUTLER: BUT YOU GOT THE NAMES OF PEOPLE HERE WHO GAVE FUNDS AND

94043564268

YOU'RE SAYING NOW THAT THE FUNDS ARE GIVEN BY PEOPLE WHOSE NAMES ARE NOT ON HERE. AND YOU'RE SAYING THAT THIS IS ILLEGAL?

GUDENAS: IF THESE STUDENTS, THESE SECRETARIES, THESE CLERKS GAVE THIS MONEY TO LOUIS STOKES AND IT WAS NOT THEIR MONEY, THEN IT IS ILLEGAL. IT HAS TO BE THEIR MONEY. IT CANNOT BE REIMBURSED, IT CANNOT BE DONATED, IT CANNOT BE A GIFT, IT CANNOT BE A SALARY RAISE. A PARENT OR GRANDFATHER CANNOT GIVE THE MONEY TO THE KIDS. IT HAS TO BE 100% THEIR MONEY. THERE CAN BE NO THREATS, THEY CAN'T BE TOLD TO MAKE THIS DONATION OR THEY WILL LOSE THEIR JOB, ETC. AND IF YOU AGAIN LOOK AT IT IN CUYAHOGA COUNTY, ANYWHERE IN FACT IN THE STATE OF OHIO, ONE UNEMPLOYED STUDENT IS DONATING MONEY TO A CONGRESSMAN NOT IN HIS DISTRICT. FINDING CLERKS ANYWHERE WHO ARE DONATING THOUSANDS OF DOLLARS TO A CONGRESSMAN WHO DOESN'T LIVE IN THEIR DISTRICT.

BUTLER: CAN YOU BE ASSURED THAT THIS IS NOT THEIR MONEY?

GUDENAS: I AM ASKING THE FEDERAL ELECTION COMMISSION, THAT'S WHY WE HAVE AN INDEPENDENT ORGANIZATION AND THEY WILL MAKE SURE THE ELECTIONS ARE RUNNING WITHOUT THE UNFAIR ?? . WELL THESE ARE STRICTLY MY SPECULATIONS THAT JOHN COYNE IS A VERY INFLUENTIAL PERSON OF THE

CUYAHOGA COUNTY DEMOCRATIC PARTY AND THERE IS CERTAINLY THE OPPORTUNITIES. I'M NOT MAKING ANY SPECIFIC ??. ALSO AT THE SAME TIME HE WAS THE OWNER OF A COMPANY THAT HAS A VERY LUCRATIVE LICENSE TO DO WORK IN CUYAHOGA COUNTY AND THESE COULD BE THE PROFITS.

UNIDENTIFIED FEMALE: ??

24043564269
GUDENAS: THAT'S ONE POSSIBILITY, THE POINT AT THIS POINT IS IT DOESN'T REALLY MATTER WHERE THE MONEY CAME FROM AS LONG AS IF IT WASN'T THEIR MONEY, IT DOESN'T MATTER IF IT WAS WON IN THE LOTTERY, OR PROFITS, OR FROM DRUG SALES, IT'S ALL THE SAME THAT IF IT IS NOT THEIR MONEY, YOU CANNOT MAKE THAT DONATION. AND THERE ARE LIMITS OF \$1,000 PER INDIVIDUAL AND IF THAT INDIVIDUAL HAS ALREADY GIVEN \$1,000, THEY CANNOT GIVE \$1,000 TO ANOTHER INDIVIDUAL TO GIVE. THESE LAWS HAVE BEEN IN EFFECT SINCE THE EARLY 70'S WHILE CONGRESSMAN STOKES WAS IN OFFICE.

MAZZARO: YOU HAVE NO KNOWLEDGE THAT CONGRESSMAN STOKES KNOWS ABOUT THIS?

GUDENAS: WELL, I WOULD THINK, OBVIOUSLY WITH THE WAY HE HANDLED THE CHECK BOUNCING, HE NEVER EVEN LOOKED AT HIS CHECKBOOK AND HAD NO

CONCEPT OF HOW MUCH MONEY WAS IN IT. I GUESS HE VERY WELL MIGHT SAY THAT I HAVE NEVER LOOKED AT MY BALANCE OF MY CAMPAIGN FUNDS AND I DON'T KNOW ANYTHING BUT I WOULD SAY THAT DOESN'T MAKE ANY SENSE. IF A GROUP OF PEOPLE ALL AT THE SAME TIME GAVE YOU \$12,000 LET'S SAY, YOU WOULD KNOW ABOUT IT. BECAUSE THESE ARE FORMS HE IS RESPONSIBLE FOR. YOU WOULDN'T JUST HAVE SOMEBODY FILE THESE FORMS AND GIVE HIM THE LEGAL OBLIGATION TO TELL THE TRUTH AND NOT EVEN LOOK AT THEM.

MAZZARO: BUT YOU HAVE NO KNOWLEDGE THAT HE KNOWS ABOUT THIS?

GUDENAS: I DID NOT ASK CONGRESSMAN STOKES WHAT PAGE HE LOOKED AT.

MAZZARO: WHAT YOU ARE STATING IS NOT FACTS, IT'S ASSUMPTION OR APPEARS.

GUDENAS: OBVIOUSLY, IF I HAD ALL THE FACTS, IT WOULD BE SETTLED AND THERE WOULD BE NO COMPLAINT ABOUT IT BECAUSE IT WOULD BE OVER AND DONE WITH AND WHY WOULD THE FEDERAL ELECTION COMMISSION EVEN LOOK AT IT.

MAZZARO: MR. GUDENAS, ON THE EVE OF THE DEMOCRATIC CAUCUS TOMORROW, YOU BROUGHT THIS INFORMATION FORWARD. WHY WASN'T IT DONE EARLIER WHEN YOU HAD THE INFORMATION SEVERAL WEEKS AGO?

24043564210

2 4 0 4 3 5 6 4 2 7 1

GUDENAS: WELL, I GAVE THE FACTS TO THE PLAIN DEALER EARLIER AND THEY CHOSE TO IGNORE THEM AND I HAD WAITED TO SEE WHAT THEY WERE GOING TO DO.

MAZZARO: WHY WOULDN'T YOU WAIT UNTIL MONDAY MAYBE RATHER THAN THE FRIDAY, THE EVE OF THE COUNTY DEMOCRATIC ELECTION?

GUDENAS: BECAUSE THERE IS MORE INTEREST IN WHAT JOHN COYNE DID TODAY THAN ON MONDAY.

MAZZARO: SO IF NO NEWS MEDIA SHOWED UP TONIGHT, YOU'D HAVE IT AGAIN A WEEK OR TWO FROM NOW WHEN YOU HAD ANOTHER OPPORTUNITY?

GUDENAS: WELL, WHETHER OR NOT MEDIA SHOWED UP HERE AT ALL, THIS THING WOULD HAVE BEEN FILED ON SCHEDULE MONDAY OR TUESDAY. IF NO ONE WOULD HAVE COVERED IT AT ANYTIME, I WOULD STILL PROCEED AND IF COYNE AND STOKES WERE FOUND GUILTY AND NO ONE REPORTED IT IN ANY MEDIA, I WOULD STILL TELL PEOPLE THAT'S THE CASE.

MAZZARO: YOU'RE MISSING MY POINT, YOU HAD THE INFORMATION SEVERAL WEEKS AGO AND YOU GAVE THEM TO THE PLAIN DEALER, WHY DIDN'T YOU FILE WITH THE ELECTION COMMISSION WHAT YOU'RE GOING TO FILE TOMORROW OR MONDAY.

24043564272

GUDENAS: BECAUSE I DID NOT HAVE ALL OF THE INFORMATION CONCERNING ALL THE PEOPLE, SOME I GOT YESTERDAY.

MAZZARO: BUT YOU HAD MOST OF IT BEFORE YESTERDAY. THAT'S WHAT YOU STATED TO THE PLAIN DEALER.

GUDENAS: I LEARNED SOMETHING NEW TODAY FROM A GENTLEMAN ??, ETC. THERE IS EVEN MORE INFORMATION I'M GOING TO GET OVER THE WEEKEND.

MAZZARO: YEAH, BUT YOU COULD HAVE FILED AN AMENDED COMPLAINT, IT DOESN'T MEAN YOU HAVE TO ...

GUDENAS: I CAN DO AS I PLEASE, YOU COULD FILE A COMPLAINT TOO.

MAZZARO: THAT'S RIGHT.

GUDENAS: YOU CAN FILE A COMPLAINT, AND I'LL DO IT MY WAY AND YOU DO IT YOUR WAY.

MAZZARO: BUT WHAT I'M SAYING TO YOU IS WHY DID YOU WAIT THIS LONG TO FILE THE INITIAL COMPLAINT WHEN YOU COULD HAVE AMENDED YOUR COMPLAINT? ON THE EVE OF THE CUYAHOGA COUNTY DEMOCRATIC CAUCUS?

GUDENAS: AGAIN, THIS INFORMATION WAS PROVIDED TO THE PLAIN DEALER EARLIER. THE PLAIN DEALER DECIDED TO NOT RUN ANYTHING. I DECIDED TO DO THIS TODAY BECAUSE I WANTED TO.

24043564273

BUTLER: ARE YOU A DEMOCRAT OR AN INDEPENDENT?

GUDENAS: I'M A DEMOCRAT.

BUTLER: ARE YOU SUPPORTING GEORGE FOR ELECTION TOMORROW?

GUDENAS: I'M NOT SUPPORTING ANYBODY BECAUSE I DON'T GET TO VOTE, ONLY THE DEMOCRATIC PRECINCT COMMITTEEMEN. I AM NOT INVOLVED IN THE VOTING.

BUTLER: THEN YOU'RE SAYING THAT THERE'S REALLY NO SIGNIFICANCE IN YOUR HAVING THIS PRESS CONFERENCE TODAY?

GUDENAS: THERE'S OBVIOUSLY SOME SIGNIFICANCE BECAUSE IT'S PROBABLY MORE INTERESTING TO THE PEOPLE OUT THERE TODAY THAN IT WOULD BE NEXT WEEK. IN OTHER WORDS, YOU DON'T WANT TO SELL YOUR CHRISTMAS ITEMS IN JULY BECAUSE PEOPLE DON'T WANT TO BUY CHRISTMAS PRESENTS IN JULY, THEY WANT TO BUY THEM IN NOVEMBER OR DECEMBER.

BUTLER: THEN WHY ARE YOU SAYING IT WOULD BE MORE INTERESTING TODAY?

GUDENAS: BECAUSE WHEN A CANDIDATE IS RUNNING FOR OFFICE, THE MEDIA IS MORE INTERESTED RIGHT BEFORE THE ELECTION AND THE ELECTION IS COMING UP WHICH ONLY MAKE SENSE. IF YOU'RE RUNNING FOR PRESIDENT, IF I

ANNOUNCE TODAY I'M RUNNING FOR PRESIDENT IN THE YEAR 2002 NO ONE WILL CARE, BUT IF IT'S 2002 AND YOU'RE RUNNING FOR PRESIDENT, THEY MAY CARE.

BUTLER: THEN YOU'RE SAYING YOU WERE NOT CONTACTED BY GEORGE'S PEOPLE TO DO THIS TODAY?

GUDENAS: NO, I WAS NOT CONTACTED.

BUTLER: OKAY.

GUDENAS: AS FAR AS WHAT THE DEMOCRATIC PARTY DOES NEXT WEEK IS..., I'M NOT RUNNING AGAINST THE DEMOCRATIC PARTY, I'M RUNNING AGAINST LOUIS STOKES. THIS WHOLE POINT IS THAT LOUIS STOKES IS VERY TIED TO JOHN COYNE, THE LEADER OF THE DEMOCRATIC PARTY AND THE RELATIONSHIP IS VERY BENEFICIAL TO EACH OTHER BUT NOT TO THE CONSTITUENTS OF THE DISTRICT.

MAZZARO: THAT'S YOUR POSITION THEN?

GUDENAS: NO, THAT'S THE FACTS.

24043564274

9 4 0 4 3 5 6 4 2 7 5

Exhibit 2

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

In the Matter of
The Honorable Louis Stokes,
Louis Stokes for Congress
Committee, and
The Committee's Treasurer.

Matter Under Review 3558

AFFIDAVIT OF JEWELL GILBERT

COUNTY OF CUYAHOGA
STATE OF OHIO

.ss

I, Jewell Gilbert, being duly sworn, depose and state as follows:

1. I am of full age, competent, and have personal knowledge of the facts to which I attest in this affidavit.

2. I assist the Louis Stokes for Congress Committee and have come to review three newspaper articles concerning Mr. Edmund Gudenas's public announcement that he planned to file a complaint with the Federal Election Commission against Congressman Stokes.

3. These three newspaper articles are: (i) "Contributions to Stokes called 'suspicious,'" Cleveland Plain Dealer (July 11, 1992); (ii) "Gudenas Might File Complaint," Euclid Sun Journal (July 16, 1992); and (iii) "Candidate plans complaint over contributions," The Sun Press (July 16, 1992).

94043564276

4. Attached to this affidavit are true and accurate copies of each of these three newspaper articles.

FURTHER AFFIANT SAYETH NOT.

Jewell Gilbert
Jewell Gilbert

Subscribed to and sworn before me this 31st day of AUGUST, 1992.

James J. Brown
Notary Public

My Commission Expires: July 13, 1994

24043564277

Contributions to Stokes called 'suspicious'

By TIMOTHY HEIDER
EUCLID REPORTER

R.D.
7/11/88
EUCLID

The opponent of Rep. Louis Stokes yesterday called for a federal investigation into thousands of dollars in campaign contributions from relatives, friends, associates and employees of Cuyahoga County Democratic Party Chairman John M. Coyne.

Edward Gudenas, a Euclid city commissioner and independent candidate for the newly redrawn 11th Congressional District, said \$20,000 in donations to Stokes between 1986 and 1988 "suspicious."

He plans to file a complaint with the Federal Election Commission on May 14.

Gudenas furnished excerpts of his own campaign statements that showed more than two dozen \$1,000 contributions from persons either related to or working for Coyne, the longtime Brooklyn mayor. All of those persons lived outside of Stokes' district at the time.

The records show:

- \$1,000 contribution in October 1986 from Fumia Kruckler, Coyne's \$20,000-a-year secretary, and a \$1,000 donation by Kruckler's sister, another City Hall employee who is married to Police Chief James Maloney.

- Coyne's three daughters, Kruckler and his two grandchildren, one of whom is attending college at the time, give \$1,000 each on the same day, June 11, 1986.

- Given contributions of \$1,000 from Coyne and several employees of an equipment supplier he hired Gudenas partially owns on Aug. 21, 1986.

"There's no way you can tell me that all of those people on the same day, at the same time, decided to contribute to a congressman running unopposed who doesn't even live in their district," Gudenas said.

He accused Coyne of giving the contributors money and asking them to donate in their own name, a violation of federal campaign laws.

Gudenas also said Stokes "knowingly accepted the money," also a campaign violation.

Gudenas acknowledged he has no proof of either charge.

Kruckler said yesterday she gave the money to Stokes because "he's a nice guy who represents all of Ohio."

Coyne yesterday denied the allegations, which he contends are politically motivated, coming as they did the day before Cuyahoga County Democrats gather to select a chairman. "It's interesting that all of this happened before the vote."

Stokes did not return phone calls. Robert Butler, who called himself a special assistant to Stokes, called the allegations "unsubstantiated."

94043564278



Euclid Sun Journal

THURSDAY, JULY 16, 1992

Gudenas might file complaint

By JEFF PROKOWSKI
Staff writer

Ed Gudenas, a Euclid councilman and candidate for the 115th District congressional seat, has termed "suspicious" several donations made to the campaign fund of incumbent opponent Louis Stokes during 1988, 1989 and 1990.

But, according to Brooklyn Mayor John Coyne, Gudenas' suspicions are unfounded.

"It's suspicious that all the donations have the same characteristics," Gudenas said. "None of the donors live in his district, all have low to

moderate incomes, they all work for, are friends of, or are direct relatives of John Coyne, and they all gave on the same day."

Gudenas said he will file a complaint with the Federal Election Commission as a result of his findings. He claims Coyne may have funneled funds to donors who, in turn, gave it to Stokes' campaign fund under their own names — a violation of campaign donation laws.

In 1988, campaign contribution reports show Stokes was given donations of \$1,000 apiece from Coyne, Brooklyn Fire Chief Joseph Pucci, Coyne's secretary Pamela Kirkkier, and Brooklyn city clerk Barbara Maloney.

The 1988 and 1990 reports show 21 donations from the above mentioned Brooklyn city employees, in addition to Coyne's nephews, nieces, and other family members, and people who work for Westbrook Village Apartments of which Coyne is a co-trustee.

The 1988 donations were made on three different dates. All the 1988 donations show June 11 as the date of donation, while the 1990 donations were all made on Aug. 31.

"The point is, Stokes has been instrumental in pushing for the finance laws regarding campaign funds that are now law and he can't even follow

See GUDENAS, page A1

Gudenas

from page A1

them," Gudenas said. "It also shows he has no support from the people who actually live in his district."

While Stokes did not return calls from Sun Newspapers, Coyne said the donations were all above board.

"I made donations and members of my family did, but there is no way I would give them money to make donations," Coyne said.

Coyne said eight members of his family made donations, as well as several Brooklyn city workers, even though none live in Stokes' district.

"I contributed to the presidential campaign and he's not from my district," said Coyne, the Cuyahoga County Democratic Party chairman and 48-year mayor of Brooklyn. "I contributed to Sen. (John) Glenn's campaign and he's not from my district."

"All I said to (relatives and employees) is that Cong. Stokes is a good friend of mine and would appreciate any help you could give him."

As for the checks being dated the same day, Coyne said, "That's a lot of bull. The dates (shown) are the deadline dates, not the date the check was issued."

Gudenas also charged that, when one of his campaign assistants

up someone of Stokes' fund — a matter of record — Coyne instructed let the records be shown at the assistant.

Gudenas, an 1992 candidate, said Coyne to see his wife's driver's license he asked to see the records at Brooklyn City Hall.

Coyne said the aide's request, via facsimile, for records and that his secretary he wanted to see records in Brooklyn public office said his secretary was the of receiving such a list of records.

"When he wanted to see wages of three people, his driver's license, just was the same person who fax," Coyne said.

"I said, 'OK, help you want the list, these are records.' He didn't know what he was looking for."

Coyne said that of the city employees, his secretary, at \$20,000 per the month.

Stokes, a 24-year-old seeking re-election, is drawn district that majority of minority residents and eastern suburbs, opposed by University Mayor Hervé Riffeault.

9 4 0 4 3 5 6 4 2 7 9

Candidate plans complaint over contributors

By JEFF PROSSER

It couldn't be a casual occupational and candidate for the 4th District congressional seat, but he had a political service, donations made to the campaign fund of incumbent opponent Louis Stokes during 1984, 1986 and 1990.

But according to Brooklyn Mayor Agner Coryne, Guderus' suspension is an indication.

"I suspect that all the 6000 donors have a 100 percent participation," Guderus said. "Some of the donors live in his district, all have had to moderate temper, they all work for, are friends of, or are direct relations of Coryne and they all gave on the same day."

Guderus said he will file a complaint with the Federal Election Commission as a result of his findings. He claims Coryne may have misused funds to donors who, in turn, gave to Stokes' campaign fund under their own names — a violation of campaign donation laws.

In 1986, campaign contributions were given to Stokes from donors of \$1,000 each from Coryne, his wife, Patsy, and Coryne's secretary Pamela Krickler and his secretary Cheryl Sanders Madson.

The 1988 and 1990 reports show 21 donations from the donor named Brooklyn city employees in addition to Coryne's spouse, three and other family friends and one who sold for Westview Village Apartments of which Coryne is a trustee.

The 1986 donations were made on three different dates. All the 1988 donations were on June 11 as the date of election, while the 1990 donations were all made on Aug. 31.

The point is, Stokes has been instructed to publish for the 1990 campaign laws regarding campaign funds that are now law and the can't even follow them," Guderus said.

It also shows he has no support from the people who actually live in his district.

While Stokes did not return calls from Dan Trevisper, Coryne said the donations were all above board.

"I never donations and members of my family did, but there is no way I would give them money," he said.

Coryne said eight members of his family made donations, he said, but never broke any city workers, even though none live in Stokes' district.

"I contributed to the presidential campaign and I've not done any other," he said. Coryne said he has not any money for pay for his and any money for pay for his contribution to Sen. John Chafee's campaign and he's not from his district.

All I said to relations and employees is that come Stokes is a good friend of mine and would appreciate any help you could give him.

At the time the check being dated the same day, Coryne said, "That's a lot of cash. The same amount are the deadline dates, not the date the check was issued."

Guderus also charged that when one of his campaign assistants called the city of Brooklyn to book

see COMPLAINT, page A8

Complaint

from page A7

in salaries of those who during in Stokes' bid — a matter of public record, Guderus charged, would be a violation of the ethics and ethics laws.

Guderus, an Independent candidate, said Coryne was asked to see the records for Stokes and Stokes' campaign.

Coryne said the files had sent a request via electronic to see the records and that he received through the Brooklyn public officials. Coryne said he never was in the presence of reviewing such a list when it was arrived.

"When he wanted to see just the wages of three people, I asked to see his driver's license list to see if he was the same person who got the FBI," Coryne said.

"I said, 'OK, help yourself.' If you want the list, then it's yours to look at. He didn't know what he was looking for."

Coryne said that of the salaries of city employees, he received a salary of \$50,000 per year. He said he was a 24-year incumbent in a district that includes a majority of minority residents in Crown Heights and Park Slope.

He was elected by University Heights Mayor Betty Rothwell, the Hispanic woman candidate.

9 4 0 4 3 5 6 4 2 8 0

2 4 0 4 3 5 6 4 2 8 1

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

In the Matter of
The Honorable Louis Stokes,
Louis Stokes for Congress
Committee, and
The Committee's Treasurer.

Matter Under Review 3558

AFFIDAVIT OF CHERYLE WILLS MATTHEWS

COUNTY OF SUFFOLK
COMMONWEALTH OF MASSACHUSETTS

.SS

I, Cheryle Wills Matthews, being duly sworn, depose and state as follows:

1. I served as treasurer of the Louis Stokes for Congress Committee ("the Stokes Committee") for the 1986, 1988, and 1990 U.S. House of Representatives election cycles, I have personal knowledge of the facts to which I aver herein, and I am authorized to make this affidavit on the Stokes Committee's behalf.

2. In my capacity as treasurer of the Stokes Committee, I was mindful of, and made it my policy and practice to comply with, the Federal Election Campaign Act ("FECA") and the regulations promulgated by the Federal Election Commission pursuant to the FECA.

3. As treasurer of the Stokes Committee, I endeavored to ensure that those assisting me were equally mindful of federal

74043564282

campaign law and regulations and made it their policy and practice to comply with federal campaign finance law and regulations in the course of their discharging their responsibilities.

4. Accordingly, both my assistants and I made it our policy and practice to comply with the federal regulation requiring the treasurer of a campaign committee to be responsible for examining all contributions for evidence of illegality and for ascertaining whether contributions received, when aggregated with other contributions from the same contributor, exceeded applicable contribution limits.

5. Further, pursuant to and in accordance with the federal regulations governing how to handle contributions, my assistants and I made it our policy and practice to: (i) investigate a contribution when genuine questions existed as to whether it was made by a corporation, labor organization, foreign national, or a federal contractor, or was made in the name of another; and (ii) refund any contribution initially thought to be legal when my assistants or I learned that the contribution was, indeed, made by a corporation, labor organization, foreign national, or federal contractor, or was made in the name of another.

6. When I was treasurer of the Stokes Committee, that committee accepted and reported the following contributions on federal disclosure reports:

<u>Contributor</u>	<u>Amount</u>	<u>Date</u>
John M. Coyne	\$ 1,000	9/5/86
Joseph Pucci	1,000	10/21/86
Pamela J. Krickler	1,000	10/21/86
Sandra L. Maloney	1,000	10/29/86
Candace R. Vitas	1,000	11/3/86
Debra J. Dixon	1,000	6/11/88
James Dixon, Jr.	1,000	6/11/88
Pamela Krickler	1,000	6/11/88
Peter Luckianow	1,000	6/11/88
Lois Pucci	1,000	6/11/88
Marlene Rain	1,000	6/11/88
Jeanette Coyne	1,000	6/11/88
Penny J. Dixon	1,000	6/11/88
John M. Coyne	1,000	6/11/88
Mary Coyne	1,000	6/11/88
Kathleen M. Rolland	1,000	8/31/90
Pamela Krickler	1,000	8/31/90
Paulette C. Higgins	1,000	8/31/90
Brenda S. Hartel	1,000	8/31/90
Jeanie Joyce	1,000	8/31/90
James Coyne	1,000	8/31/90
Ruth J. Coyne	1,000	8/31/90
John M. Coyne	1,000	8/31/90
Maryann Merce	1,000	8/31/90
Robert J. Mickey	1,000	8/31/90

7. I did not know when each such contribution was accepted and reported, nor have I ever since been informed, otherwise come to learn or have any facts to indicate that any of the above contributions were illegal in that any was made by a corporation, labor organization, foreign national, federal contractor, or made in the name of the another.

8. Furthermore, nothing on the face of any of the checks comprising the contributions listed above or in the circumstances

surrounding the making and receipt of any such contribution led me to conclude that a genuine question existed as to the legality of any such contribution so as to necessitate investigative or corrective action pursuant to federal campaign finance regulations.

FURTHER AFFIANT SAYETH NOT.

Cheryle Wills Matthews
Cheryle Wills Matthews

Subscribed to and sworn before me this 31 day of AUGUST, 1992.

Emily R. Silva
Notary Public

My Commission Expires:
EMILY R. SILVA
NOTARY PUBLIC, MASSACHUSETTS
MY COMMISSION EXPIRES NOV 17, 1996 1996

94043564285

O-G-C 6289

BRAND & LOWELL

A PROFESSIONAL CORPORATION
923 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE: (202) 662-9700
TELECOPIER: (202) 737-7565

September 1, 1992

BY FACSIMILE/HAND DELIVERY

Veronica Gillespie, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE GENERAL COUNSEL
92 SEP -1 PM 4:06

Re: MUR 3558

Dear Ms. Gillespie:

Further to our discussion of this morning, this letter confirms that you have agreed to allow Respondents Louis Stokes for Congress Committee, its treasurer, and Congressman Louis Stokes to have until Friday, September 11, 1992, to respond to Complainant's supplemental submission.

Thank you very much.

Sincerely,

David E. Frulla / ldm
David E. Frulla

DEF:ldm

24043564286

PERKINS COIE

06-6300

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

September 9, 1992

Veronica Gillespie
Office of the General Counsel
Federal Election Commission
999 E Street, NW, 6th Floor
Washington, DC 20463

92 SEP -9 PM 12:56

FEDERAL ELECTION COMMISSION

Re: MUR 3558

Dear Ms. Gillespie:

I appreciate your letter of August 27, 1992, confirming the extension of time granted for a response in this matter to September 10, 1992.

As I anticipated, this extension granted by the Office of General Counsel will be insufficient to enable me to complete the preparation of the response. As you recall, I advised you of this possibility in our telephone conversation immediately before my letter request of August 10, 1992.

There are numerous respondents in this matter and some considerable factual preparation required. The intervening August holidays have made an expeditious completion of this task impossible. I would appreciate if you would forward to the Commission my request for an additional extension of time within which to respond to September 25, 1992. This is five days less in length than my originally proposed extension to September 30, 1992.

If you have any questions or comments, please do not hesitate to contact the undersigned.

Very truly yours,

Robert F. Bauer /dml

Robert F. Bauer

RFB:dml

[DA922530.014]

94043564287

BRAND & LOWELL

A PROFESSIONAL CORPORATION
923 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE: (202) 682-9700
TELECOPIER: (202) 737-7865

September 11, 1992

BY FACSIMILE

Veronica Gillespie, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3558

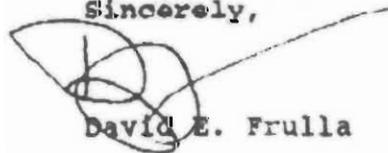
Dear Ms. Gillespie:

As you know we represent the Louis Stokes for Congress Committee, its treasurer, and Congressman Louis Stokes in the above-captioned matter under review. We discussed last week these Respondents' filing a supplemental response to new allegations provided by the Complainant and set today as the date for that filing.

I have attempted to contact you by telephone today to inform you that logistic difficulties will not make it possible for us to file that response and an accompanying affidavit today. We would thus greatly appreciate your allowing us to file the submission on Monday, September 14, 1992.

Thank you very much in advance for your consideration in this regard.

Sincerely,



David E. Frulla

94043564288

66C 6415

BRAND & LOWELL

A PROFESSIONAL CORPORATION
923 FIFTEENTH STREET, N.W.
WASHINGTON, D.C. 20005

TELEPHONE: (202) 662-9700
TELECOPIER: (202) 737-7565

September 14, 1992

BY HAND DELIVERY

Veronica Gillespie, Esquire
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3558

Dear Ms. Gillespie:

Enclosed please find Respondents' supplemental submission and accompanying Affidavit of Eugene Pearson stating that no basis exists for the Commission to proceed with this MUR. We will provide the original signature page for Mr. Pearson's affidavit as soon as we receive it.

Also attached to this letter are the original signature pages from the Affidavits of Jewell Gilbert, George Wazzaro, and Cheryle Wills Matthews. These three affidavits accompanied Respondents' original submission in opposition to the complaint.

Please call me if you have any questions. I also look forward to hearing from you on the confidentiality issue we discussed today and thank you very much for your assistance in this regard.

Sincerely,

David E. Frulla

DEF:ldm
Enclosures

94043564289

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

In the Matter of)

The Honorable Louis Stokes,)
Louis Stokes for Congress)
Committee, and)
The Committee's Treasurer.)

Matter Under Review 3558

SUPPLEMENTAL RESPONSE OF CONGRESSMAN LOUIS STOKES, THE LOUIS
STOKES FOR CONGRESS COMMITTEE, AND THE COMMITTEE'S TREASURER
DEMONSTRATING NO "REASON TO BELIEVE" EXISTS FOR
THE COMMISSION TO PROCEED WITH THIS MUR

24043564290
Complainant filed two supplemental submissions after the Commission processed his complaint pursuant to 11 C.F.R. § 111.5. The Commission transmitted this new material to counsel for these Respondents (the Louis Stokes for Congress Committee, its treasurer, and Congressman Louis Stokes) on August 28, 1992. Respondents did not have the opportunity to address Complainant's latest two submissions in their August 31, 1992, response demonstrating that no "reason to believe" exists for the Commission to proceed with this MUR. Respondents, accordingly, submit the following supplemental response addressing Complainant's newly proffered material.

Complainant's first submission is a letter on City of Brooklyn, Ohio letterhead dated August 7, 1992. The letter lists the salary history for three city employees who made contributions to the Stokes for Congress Committee. Complainant had alleged contributions from these contributors must have been reimbursed because the contributors did not have sufficient income to support the contributions in question.

94043564291

Respondents explained in their earlier submission that federal regulations placed the Stokes Committee's treasurer under no obligation to "means test" these contributors, either when the contributions were received and deposited or now, absent some credible evidence of wrongdoing not presented on this record. Complainant's innuendo-based surmise (even with the addition of the August 7, 1992, Brooklyn letter's salary information) is not sufficient to disturb the presumption set out in 11 C.F.R. Part 103 that a contribution may be accepted unless and until competent evidence to the contrary arises. But, insofar as any supplemental response is required, Complainant persists in conveniently ignoring myriad other perfectly permissible potential sources of funds (e.g., other employment or unearned income; spouse's income, see 11 C.F.R. § 110.1(i)) available for these contributors to make the contributions at issue.

Complainant's second submission alleges that Brooklyn, Ohio Mayor John M. Coyne made an excess contribution to Congressman Stokes's authorized committees in 1986. The Commission disclosure records Complainant provided show the following two general election contributions from Mr. Coyne: (i) \$1,000 to the Louis Stokes for Congress Committee on June 18, 1986; and (ii) \$1,000 to the Minority Business Friends Committee for Congressman Louis Stokes on August 5, 1986.

Review of these committees' records indicates they were both authorized committees of Congressman Stokes in 1986 and thus affiliated for purposes of aggregating contribution limits. See

11 C.F.R. § 100.5(g)(1). On that basis, Mr. Coyne appears to have made an excess general election contribution to Congressman Stokes's authorized committees in 1986.

Respondents submit the committees' acceptance of an excess contribution from Mr. Coyne was an inadvertent, isolated error. Indeed, Complainant has scoured and (based on his second submission) re-scoured all Stokes-related committee disclosure forms and found precisely one such error. Commission records reveal Mr. Coyne provided different contributor information (i.e., different employer information) to the two committees. Provision of the different information appears to have contributed to the confusion that occurred.¹

This single apparent violation should not, however, prevent the Commission from concluding this MUR. Respondents have taken the only possible step to ameliorate the excess contribution. Mr. Eugene Pearson, current treasurer of the Stokes for Congress Committee, avers in his affidavit (attached) that Respondent Stokes for Congress Committee has refunded Mr. Coyne's \$1,000 contribution.

Based on this record, Respondents respectfully request the Commission to act as it has recently done in MURs 2934, 3271, and 3371. In these three recent MURs, the Commission found reason to believe excess contributions occurred, but took no further action

¹ It should be noted that Complainant offers no evidence that Congressman Stokes either knew his authorized committees accepted an excess contribution or authorized these committees to do so.

94043564292

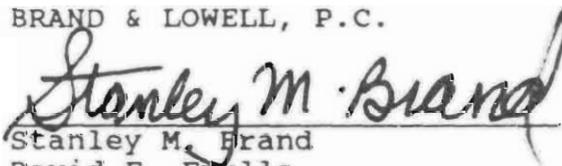
based on that "RTB" finding. See FEC Record (September 1992).
The same result is particularly appropriate here, given the
isolated, inadvertent nature of the error and the prompt (upon
notice of the error) refund.²

For the foregoing reasons, Respondents respectfully submit
the Commission should expeditiously conclude this matter under
review as to all of them.

Dated: September 14, 1992

Respectfully submitted,

BRAND & LOWELL, P.C.


Stanley M. Brand
David E. Frulla
923 Fifteenth Street, N.W.
Washington, D.C. 20005
(202) 662-9700

Counsel for Respondents Louis
Stokes, the Stokes for
Congress Committee, and the
Committee's Treasurer

² At a very minimum, however, the Commission should
dismiss all aspects of the complaint pertaining to allegations of
improper acceptance of allegedly reimbursed contributions. As
respondents explained in their prior submission, Complainant has
adduced no "reason to believe" that Respondents should have
either not accepted or refunded the contributions originally at
issue on the basis that they were made in the name of another.
Mr. Coyne's unfortunately over-generous contribution to the
Stokes committees for the 1986 general election does not itself
provide "reason to believe" for the separate proposition that
these committees or any of Respondents knew or reasonably should
have concluded that Mr. Coyne reimbursed the contributions at
issue herein and, accordingly, refunded them.

94048564293

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES OF AMERICA

In the Matter of
The Honorable Louis Stokes,
Louis Stokes for Congress
Committee, and
The Committee's Treasurer.

Matter Under Review 3558

AFFIDAVIT OF EUGENE PEARSON

COUNTY OF CUYAHOGA
STATE OF OHIO

.ss

I, Eugene Pearson, being duly sworn, depose and state as follows:

1. I am of full age, competent, and have personal knowledge of the facts to which I attest in this affidavit.
2. I am treasurer of the Louis Stokes for Congress Committee and make this affidavit based on facts available to me in that capacity.
3. Records of the Louis Stokes for Congress Committee and the Minority Business Friends Committee for Congressman Louis Stokes reveal the following two general election contributions from Mr. John M. Coyne: (i) \$1,000 to the Louis Stokes for Congress Committee on June 18, 1986; and (ii) \$1,000 to the Minority Business Friends Committee for Congressman Louis Stokes on August 5, 1986.

94043564294

4. Review of the two committees' records indicates they were both authorized committees of Congressman Stokes in 1986 and thus affiliated for purposes of aggregating contribution limits. See 11 C.F.R. § 100.5(g)(1).

5. On September 11, 1992, the Louis Stokes for Congress Committee transmitted a refund of \$1,000 to Mr. John M. Coyne.

FURTHER AFFIANT SAYETH NOT.

Eugene Pearson
Eugene Pearson

Subscribed to and sworn before me this 11th day of September, 1992.

James J. Brown
Notary Public

My Commission Expires: July 13, 1994

24043564295



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
F.E.C.

SEP 16 1992 12:37

SENSITIVE

September 16, 1992

TO: The Commission
FROM: Lawrence M. Noble
General Counsel
BY: Lois G. Lerner *slr*
Associate General Counsel

SUBJECT: MUR 3558 - Request for Extension of Time

On July 17, 1992, the Federal Election Commission received a complaint filed by Edmund V. Gudenas alleging certain violations of the Federal Election Campaign Act of 1971, as amended, by Congressman Louis Stokes, Louis Stokes for Congress Committee ("Committee"), its treasurer, and several other respondents. On July 23, 1992, the Commission notified the respondents of the complaint in this matter. On August 26, 1992, the Commission received additional information from the complainant pertaining to the allegations in the complaint and on August 27, 1992, the appropriate respondents were so notified.

On August 12, 1992, the Commission received a request from Counsel to some of the respondents for an extension of 46 days until September 30, 1992 to file a response in the above-referenced matter. However, after discussing the circumstances with staff of this Office, counsel agreed to reduce his request to 30 days. This Office granted the extension for 30 days, until the close of business, September 10, 1992. Nevertheless, on September 9, 1992, the Commission received a second request from counsel for another extension. See Attachment. As justification for the additional extension, counsel cites the considerable factual preparation required, intervening August holidays, and the numerous respondents involved in this matter. This Office recommends that, in order to prevent even further delay, the Commission grant an extension of time in MUR 3558 until September 25, 1992.

RECOMMENDATIONS:

1. Grant an extension of time until September 25, 1992, to counsel in MUR 3558 to respond to the notification letters.
2. Approve the appropriate letter.

Attachment
Request for Extension

Staff Assigned: Veronica M. Gillespie

94043564296

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Congressman Louis Stokes; Louis Stokes) MUR 3558
 for Congress Committee ("Committee"),)
 its treasurer, and several other)
 respondents - Request for Extension)
 of Time.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on September 21, 1992, the Commission decided by a vote of 6-0 to take the following actions in MUR 3558:

1. Grant an extension of time until September 25, 1992, to counsel in MUR 3558 to respond to the notification letters, as recommended in the General Counsel's Memorandum dated September 16, 1992.
2. Approve the appropriate letter, as recommended in the General Counsel's Memorandum dated September 16, 1992

Commissioners Aikens, Elliott, McDonald, McGarry, Potter and Thomas voted affirmatively for the decision.

Attest:

9-22-92
Date

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

Received in the Secretariat: Wed., Sept. 16, 1992 12:37 p.m.
 Circulated to the Commission: Wed., Sept. 16, 1992 4:00 p.m.
 Deadline for vote: Mon., Sept. 21, 1992 4:00 p.m.

dr

24043564297



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 24, 1992

Robert F. Bauer, Esq.
Perkins Coie
607 14th Street, N.W.
Washington, D.C. 20005-2011

RE: MUR 3558

Dear Mr. Bauer:

This is in response to your letter dated September 9, 1992, requesting an additional extension of time until September 25, 1992 to file a response in the above-referenced matter. On September 21, 1992, the Commission granted the requested extension. Accordingly, your response is due by the close of business on September 25, 1992. No further extensions will be granted.

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

Sincerely,

Veronica M. Gillespie

Veronica M. Gillespie
Attorney

24043564298



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION

SEP 28 1 46 PM '92

September 16, 1992

POSTMASTER

U.S. Post Office

Medina, Ohio 44256

MUR 3558

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Ms. Marlene Rain

LAST KNOWN ADDRESS: 1005 Oak Street
Medina, Ohio 44256

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

- () Mail is Delivered to Above Address
- () Moved, left no forwarding address
- () No such address
- () Other (Please Specify)

New Address : Forward address expired

RECEIVED
FEDERAL ELECTION COMMISSION
SEP 28 PM 4:02

94043564299

Oct 5 11 16 AM '92



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 16, 1992

POSTMASTER

U. S. Post Office

Brighton, Massachusetts 02135

MUR 3558

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Debra J. Dixon

LAST KNOWN ADDRESS: 144 N. Beacon Street, #4A

Brighton, MA 02135



FORWARDING ORDER EXPIRED
BRIGHTON, MA 02135

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

- () Mail is Delivered to Above Address
- () Moved, left no forwarding address
- () No such address
- () Other (Please Specify)

New Address : _____



94043564300

92 OCT -5 PM 3:53
RECEIVED
FEDERAL ELECTION COMMISSION

6006632
RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

SEP 25 12 18 PM '92



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 16, 1992

POSTMASTER

U.S. Post Office

Brooklyn, Ohio 44144

MUR 3558

92 SEP 25 PM 2:55

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Peter Luckianou

LAST KNOWN ADDRESS: 4691 Ridge Road

Brooklyn, Ohio 44144

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

- Mail is Delivered to Above Address
- Moved, left no forwarding address
- No such address
- Other (Please Specify)

FOE



New Address : 4170 TEEHAWAY
BEAUMONT, TEXAS
17206

94043564301



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

SEP 22 11 04 AM '92

September 16, 1992

POSTMASTER

U.S. Post Office

Cleveland, Ohio 44109

MUR 3558

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Kathleen Rolland

LAST KNOWN ADDRESS: 4002 Bush Avenue

Cleveland, Ohio 44109

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

- Mail is Delivered to Above Address
- Moved, left no forwarding address
- No such address
- Other (Please Specify)

New Address : _____

FORWARDING
ORDER
EXPIRED!

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE
92 SEP 22 PM 4:27

94043564302

6004631
RECEIVED
FEDERAL ELECTION
COMMISSION
WASHINGTON, D.C.

SEP 25 12 18 PM '92



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 16, 1992

POSTMASTER

U.S. Post Office
Brooklyn, Ohio 44144

MUR 3558

92 SEP 25 PM 2:54

RECEIVED
FEDERAL ELECTION COMMISSION

ADDRESS INFORMATION REQUEST

Pursuant to 39 C.F.R. § 265.6(d)(1), please furnish this agency with a new address, if available, for the individual or entity listed below, or verify whether the address given below is one at which mail for this individual or entity is currently being delivered.

NAME: Pamela Krickler

LAST KNOWN ADDRESS: 6279 Dawning Road
Brookly, Ohio 44144

Under 39 C.F.R. § 265.8(g)(5)(i), we request a waiver of fees. In this connection I hereby certify that the Federal Election Commission, an agency of the U.S. Government, requires the information requested above in the performance of its official duties, and that all other known sources for obtaining it have been exhausted. A return envelope is enclosed for your convenience.

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

FOR POST OFFICE USE ONLY

- () Mail is Delivered to Above Address
- (x) Moved, left no forwarding address
- () No such address
- (x) Other (Please Specify)

New Address : over 1 yr ago -



24043661303

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATION
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011 • (202) 628-6000

OCC
6638

92 SEP 25 PM 3:47

September 25, 1992

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATIVE DIVISION
SEP 25 3 44 PM '92

Veronica M. Gillespie
Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 3558

Dear Veronica:

This letter replies to your notification of a complaint filed by Edward Gudenas. The complaint alleges violations by certain relatives of Mayor John Coyne of Brooklyn, Ohio and by certain employees of that city.¹

The complaint does not clearly identify the individuals alleged to have violated the Act. Mr. Gudenas has instead attached certain Schedule A's, affixing black check marks by the names of certain contributors. Certain of those with the check by their names have been notified of the complaint, while others have not. This firm represents the following:

Family Members:

- Mayor John M. Coyne
- Ruth Coyne
- Penny Dixon
- Debra Dixon
- James Dixon, Jr.
- Jeanette Coyne
- Marlene Rain
- James Coyne
- Mary Coyne

¹There is also a contribution requiring attention from an employee of a sole proprietorship of John Coyne's, Central Coordinating Services, discussed infra.

24043564304

Veronica M. Gillespie
September 25, 1992
Page 2

Employees:

Pamela Krickler
Maryann Merce
Sandra L. Maloney
Joseph and Lois Pucci

Those named individuals who have not been served assume that there was an intention to do so or that in some way notification was directed to a dated or incorrect address. Since none wishes any delay in the resolution of this matter, they are prepared to identify themselves as respondents and to reply through counsel at this time.

Nature of the Allegations

Mr. Gudenas' complaint is brief and its argument is simple. He has identified roughly two classes of individuals, family members of Mr. Coyne and employees of the city of which he is mayor,² and he has concluded without further evidence that none would have possessed the resources or the independent will to make contributions of \$1,000 to Congressman Louis Stokes.

The emphasis in the complaint is on the absence of will or resources: its claim is framed in the alternative. Mr. Gudenas alleges that if they had the resources they lacked the will, contributing only at the direction of Mr. Coyne. And if they possessed the will, he would claim, they lacked the resources which would, in turn, have been supplied in some fashion by Mr. Coyne.³

²The one exception, noted previously, is Candace Vitas, an employee of Central Coordinated Services which was a sole proprietorship of John M. Coyne.

³In an amended complaint, Mr. Gudenas seems to suggest that city employees -- Ms. Krickler, Ms. Merce and Ms. Maloney -- did not have adequate incomes with which to make a contribution. This is a slight change from the original complaint, in which a suggestion was that Mayor Coyne may have adjusted their incomes higher to accommodate contributions they could not otherwise afford.

24743564305

Veronica M. Gillespie
September 25, 1992
Page 3

Finally, Mr. Gudenas has by amended complaint identified what he alleges to be an excessive contribution by Mr. Coyne to Mr. Stokes in 1986.

Position of the Respondents: Family Members

All of the family members have been interviewed by counsel and fully participated with information and with necessary documentation. Each refutes any suggestion that their contributions were made with resources supplied by Mr. Coyne. So as to simplify the presentation, counsel has attached to this response exhibits for each of the individual family member respondents which set out their position. (Exhibits 1-12.)

The information provided to the Commission in this fashion is substantial, more than customary in responding to notification of a Complaint. All of the Respondents were prepared to offer liberal amounts of information to assure that the Commission had what is necessary to make quick work of the Complaint, dismissing it without the need for a further investigation. The approach here is unusual, but it reflects the keen wish of all concerned to clear their names in an already highly publicized matter. It also presents a "Catch-22": to shorten the proceeding and avoid a protracted investigation, the respondents are supplying information which in normal circumstances would only be available upon investigation. All are agreed, however, that an open, cooperative engagement with the Commission at this stage should render any further proceedings unnecessary.

The Commission will note that all of the accounts are similar in the most crucial respect: that family members made their contributions with their own funds, not with funds specifically supplied for that purpose by Mr. Coyne and contributed to Louis Stokes only at his direction.⁴

⁴Of course, there is no question that neither the Act nor any other statute prohibits one person from suggesting to another that a contribution be made, or even from urging that it be made, nor would any such enactment survive its obvious constitutional defects. To the extent that Gudenas' claim is to the contrary, it must be dismissed on the law and no further argument by respondents on the point is necessary or will be offered.

24043564306

Veronica M. Gillespie
September 25, 1992
Page 4

The statements also note that Mr. Coyne has made gifts in substantial amounts to family members over many years. Supplementing the accounts of individual family members is a letter submitted to counsel by Mr. Joseph Lawson, an attorney and Certified Public Accountant who has long advised Mr. Coyne on the tax and other legal issues associated with gifts to his family. (Exhibit 13.)

One such gift was made in May of 1988 and it followed the pattern of gifts in identical amounts to all children and in different but also identical amounts to all grandchildren. Around the time that the gift was made, Mayor Coyne recommended to various family members a contribution for Louis Stokes. In some cases he made the suggestion directly to a family member, and in other cases, it was relayed by one family member to another. All family members, however, made their contribution willingly and all had the funds necessary to make it.

Attached is Exhibit 14, a listing of each member of the family receiving a gift in May of 1988 following the liquidation by Mr. Coyne of an investment and as confirmed by the letter from Mr. Lawson. Apart from illustrating the pattern, it underscores the additional point that not all family members receiving a gift made a contribution and that the gifts cannot therefore be viewed as having been made for that purpose. In any event, each gift was substantially larger than any one of the contributions made to Mr. Stokes.

Accordingly, the respondents who are family members respectfully request dismissal of that portion of the Gudenas Complaint which alleges violations of the Act by them.

Contributions by City Employees

Mr. Gudenas builds this case around the peculiar proposition that people of a certain income will not make contributions of \$1,000. This specious position is applied in particular to the contributions by Ms. Krickler, Ms. Merce and Ms. Maloney. In his most recent amended complaint, he submits information about their various salaries provided upon request to Brooklyn City Councilwoman Rita Brown. This, he apparently believes, makes his case that their income could not on its face support a \$1,000 contribution.

Gudenas omits any consideration of the possibility that each of these three women are married to working husbands. They discussed the contribution recommended by Mayor Coyne

24043564307

with their spouses, then decided to give. None of the three can easily accept that this explanation on their part is required. Each feels that she was entitled to make the contribution in the maximum amount allowed by law -- whatever her income. The suggestion that people of certain income can never contribute in the maximum amount is demeaning to them. Even more offensive to these respondents is the application of this maxim to three working women.

On the basis of this prejudiced worldview, they have come under the scrutiny of Gudenas. The allegations have been made public and much damage to their families and their reputations has been done. Ms. Merce and Ms. Krickler have each set out detailed accounts of how this matter has unfolded to their detriment. (Exhibits 15 and 16.) The General Counsel's office will note that the letters were addressed to counsel, but counsel in turn with the permission of Ms. Krickler and Ms. Merce are submitting it for the record. Counsel offers these statements in the hope that it will spur the Commission to a prompt decision in recognition of the costs already inflicted by the Complaint and this proceeding on these respondents.

In sum, none of these employees contributed with any but their own resources and none did so for any reason other than their wish to do so.⁵ Mr. Gudenas' complaint is simply without foundation. This type of proof should never be treated as sufficient to support a reason to believe finding and subsequent investigation.

Accordingly, the portion of the Gudenas Complaint alleging violations by these City Employees must be dismissed and Ms. Krickler, Ms Merce, and Ms. Maloney request prompt action to this end.

Employees of Central Coordinating Services

Two employees at Central Coordinating Services, Ms. Vitas and Mr. Luckianow, have also been marked by Mr. Gudenas as having made suspect contributions. Mr. Luckianow has moved

⁵Once again, there is no law to prohibit a contribution made at the suggestion of another, nor could there be one. Nothing in the Gudenas Complaint which makes the contrary claim can be sustained.

24943564308

Veronica M. Gillespie
September 25, 1992
Page 6

from Brooklyn, Ohio and his whereabouts are unknown.
Ms. Vitas lives in the area and she too was interviewed.

It turns out upon further examination that Ms. Vitas' contribution was misreported. It was in fact a contribution drawn on the account of Central Coordinating Services, a sole proprietorship of John Coyne. While Ms. Vitas had check writing authority, the funds were Mr. Coyne's, not Ms. Vitas', and when she executed the check in question, she was effecting a contribution from Mr. Coyne, not herself. The contribution should have been treated as a contribution from Mr. Coyne.

An excessive contribution has been alleged by Mr. Gudenas, reported to have been made on August 5, 1986. It turns out that the Stokes Committee reported this contribution from the Cuyahoga Democratic Executive Committee as one from Mr. Coyne personally. A copy of the relevant check is attached as Exhibit 17. Mayor Coyne requests therefore that this claim of the Gudenas complaint also be dismissed.

Very truly yours,



Robert F. Bauer
Traci J. Stegemann

SMB:slh

24743564309

94043564310

John and Ruth Coyne

John M. Coyne is the Mayor of Brooklyn, Ohio and has held elective office as the City's mayor for 53 years. Ruth is his wife. They have a large, close-knit family. They have many friends and political contacts. Mayor Coyne is well respected by his family, friends, colleagues, employees, and constituents.

The Mayor is a good friend of Congressman Stokes. They see each other frequently at political events. Mayor Coyne is an active supporter of Congressman Stokes. During the Congressman's campaigns in 1986, 1988, and 1990, the Mayor contributed \$1,000 each year. His wife Ruth also gave \$1,000 in August, 1990.

In addition to his own contributions, Mayor Coyne asked various members of his family and employees to consider giving contributions to Congressman Stokes. The Mayor did not give any of his family members or employees money with which to make a contribution or with the understanding that a contribution be made. He did not give any of his employees a raise in salary to compensate for a contribution.

Mayor Coyne simply tried to help a respected friend raise money for a campaign by asking the people he knew best to contribute. He is very upset by Ed Gudenas' implications that he did anything improper. Moreover, he is deeply concerned about the effect this matter is having on his family members and employees who contributed to Congressman Stokes. He is particularly troubled by the harassment and unkind remarks his employees have been subjected to because they followed his suggestion and decided to contribute money to Congressman Stokes.

24743564311



9 4 0 4 3 5 6 4 3 1 2

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED DATE 08-08-2011 BY 60322 UCBAW/SJS

Penny J. Dixon

Penny Dixon is the daughter of Mayor Coyne. Over the years Penny has received numerous gifts of money from her father. Many of these gifts have been for sizable amounts of money. Penny and her husband often have invested this money as well as their own money.

In May of 1988, Mayor Coyne asked Penny if she would consider contributing to Congressman Stokes' campaign. Penny thought the suggestion over and decided to contribute to the campaign. She emphasizes that the decision to contribute was her own. Penny and her husband have managed their money well and could well afford to make the contribution. Her father did not give her any money to make a contribution. Indeed, she resents the implication that she and her husband could not have afforded to make a contribution on their own.

She does not believe that her father suggested an amount to give Congressman Stokes. She gave the check to the Mayor to send into the Stokes' headquarters. Her check to Congressman Stokes is dated May 21, 1988.

Penny and her husband regularly attend political dinners. They have always made contributions to political campaigns, both at the local and national levels. Political contributions are a way of life in their family.

Penny spoke to her son James and her daughter Debra about making contributions to the Stokes campaign. Due to the generosity of her father to her children over the years, she knew they had sufficient funds to make a contribution if they were interested in doing so.

94243564313



24043564314

Debra J. Dixon

Debra Dixon is Mayor Coyne's granddaughter. For as long as she can remember, her grandfather has given her gifts of money for birthdays, Easter, graduations. At least once a year, he will also give her a check in a substantial amount. As she got older, the check amounts increased. By June of 1988, she had saved a substantial amount of money. She graduated from college in May, 1988 without any student loans to pay.

Debra has been active in the political scene for a number of years. She attends political functions and fundraisers fairly frequently. Debra has known Congressman Stokes for a number of years.

In May or June 1988, Debra's mother, Penny Dixon, suggested to Debra that she contribute to Congressman Stokes' campaign. Because she thought highly of Representative Stokes and because she had more than sufficient funds, Debra decided to follow her mother's suggestion and contribute \$1,000 to Congressman Stokes. Debra's grandfather did not give her money for the contribution or with the understanding that she would make a contribution to the Stokes' campaign.

24943564315



24043564316

James Dixon, Jr.

James Dixon, Jr. (Jim) is Mayor Coyne's grandson. Like the other grandchildren, he has always received generous gifts of money from his grandfather. When his mother, Penny Dixon, suggested to him that he contribute to Congressman Stokes' campaign in June 1988, he agreed to make the contribution partly because his mother had asked and partly because he believed it was a good idea. Jim's grandfather did not give him any money for the express purpose of making a contribution or with the understanding that he would contribute money to the Stokes' campaign. Jim followed his mother's lead in making the \$1,000 contribution.

24043564317

24043564318

Jeanette Coyne

Jeanette Coyne is Mayor Coyne's daughter-in-law. For all of her married life, Jeanette has benefited from the generosity of her father-in-law. She cannot remember a time when he has not given her and her husband gifts of money. Jeanette's husband is employed. The couple has managed their money well.

In May, 1988, the Mayor asked Jeanette if she would consider making a contribution to Congressman Stokes. He told her that \$1,000 was the maximum amount she could give. Jeanette decided to make a \$1,000 contribution because the Mayor had asked her to do so. She felt that because the Mayor had done so much for them and had been so generous over the years that if he wanted her to do this, she would be happy to oblige. She also likes Congressman Stokes and was very comfortable supporting his campaign. If she had not liked the Congressman, she would not have agreed to make a contribution.

Mayor Coyne did not give Jeanette any money for the purpose of making a contribution or with the understanding that she would make such a contribution. Jeanette's check to Congressman Stokes is dated May 25, 1988.

Jeanette asked her daughter Marlene Rain to consider making a contribution to the Stokes' campaign because it seemed to mean a lot to Mayor Coyne. Jeanette knew that Marlene could well afford to make a contribution. Jeanette did not ask her other three children to contribute.

24043564319

24043564320

Marlene Rain

Marlene Rain is Mayor Coyne's granddaughter. Like the Mayor's other grandchildren, she has always received generous gifts of money from her grandfather. Over time, she has saved a substantial amount of money. Marlene is married. Her husband is employed.

In May, 1988, Marlene's mother, Jeanette Coyne, asked her to consider making a contribution to Congressman Stokes' campaign. While Marlene does not recall ever contributing to a political campaign in the past, she realized that a contribution to Congressman Stokes would be appreciated by her grandfather. In addition, she thinks highly of Congressman Stokes. She could well afford to make a donation. She decided to contribute \$1,000 to Congressman Stokes. Her check is dated May 23, 1988. The contribution was her own money. Her grandfather did not give her any money for the contribution or with the understanding it would be used for a contribution to Congressman Stokes.

24043564321



24043564322

James Coyne

James Coyne is Mayor Coyne's son. He is the Recreation Commissioner for the city of Brooklyn, a civil service job. He has served on a state board on state parks and recreational facilities. While on that board he came to know many of Ohio's politicians. Throughout the years he has made numerous contributions to state and local politicians.

James is single. Between his job and the generous gifts of money from his father throughout the years, he has saved a substantial amount of money. In July or August of 1990, James mentioned to his father that he was thinking of making a contribution to Congressman Stokes' campaign. James decided to give \$1,000 to the campaign.

24043564323



9 4 0 4 3 5 6 4 3 2 4

Mary Coyne

Mary Coyne is Mayor Coyne's daughter-in-law. Mary and her husband receive gifts of money from Mayor Coyne throughout the year. Her father-in-law has been consistent in his generous gift giving throughout her marriage. Her husband has a job and together they have managed their money well.

In May, 1988, Mayor Coyne asked Mary if she would consider making a contribution to Congressman Stokes. She said she was interested in doing so and asked what amount she could give. Her father-in-law explained that she could give up to \$1,000. Mary decided she would give that amount. Mary is very outspoken and if she had not wanted to make a contribution she would have told her father-in-law that she was not going to give any money to the Stokes campaign.

Mary could easily afford the contribution. Her father-in-law did not give her any money for her contribution to Congressman Stokes. She resents the implication that because she is a housewife she does not have either the money or the independence to make this kind of a contribution.

Neither Mary nor her father-in-law asked Mary's children to contribute to Congressman Stokes.

24043564325



9 4 0 4 3 5 6 4 3 2 6

Pamela J. Krickler

Pamela Krickler is Mayor Coyne's secretary. She has worked for him since she graduated from high school. She regards the Mayor as her boss and as her friend. Pamela is married. Her husband is employed.

Pamela gave to Congressman Stokes on October 21, 1986, June 11, 1988, and August 31, 1990. Her contribution each time was for \$1,000. She gave to the Stokes campaigns because each time Mayor Coyne asked her to consider making a contribution. She made the contributions because she trusted the Mayor completely and felt that if he thought this was a good thing to do, then it was. Pamela also decided she could afford to make the contributions.

Mayor Coyne did not give Pamela money for the contributions. Nor did he give her a raise in salary to compensate for the contributions. Pamela's salary is set by City Council. At no time was she concerned she could be fired if she decided not to contribute to Congressman Stokes.

Ever since this matter has appeared in the paper Pamela has been taunted by a member of the City Council as well as other members of the community. Her children have also been subject to rude comments. This matter has placed a strain on her marriage. She is embarrassed and annoyed by the whole situation. She works and so does her husband. While she understands that Mr. Gudenas is simply playing politics with his allegations, she deeply resents being used as a political pawn.

24043564327

24043564328

Maryann Merce

Maryann Merce is Mayor Coyne's administrative assistant. She is on the Cuyahoga County Democratic Executive Committee. She has met Congressman Stokes on several occasions. She is married and her husband is employed.

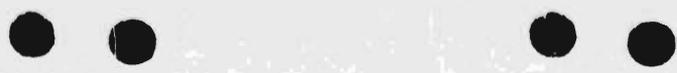
In July, 1990, Mayor Coyne asked Maryann if she would consider making a contribution to Congressman Stokes' campaign. He told her she could give up to \$1,000.

Maryann discussed making a contribution with her husband. She is very loyal to the Mayor and decided that if he really wanted her to do this, then she would. Maryann and her husband wanted to support the Mayor. Her check to the Mayor is dated August 2, 1990.

The Mayor did not give Maryann any money for the contribution. The Mayor did not give Maryann a raise to compensate her for the contribution. Maryann's salary is set by City Council. Maryann did not feel her job was in jeopardy if she did not make the contribution.

Maryann is extremely upset and embarrassed by Ed Gudenas' allegations. Since an article has appeared in the paper on this matter, she has been subjected to unkind and rude remarks from members of the community. Maryann is completely perplexed at why it is anyone's concern about who she gave to and how much she gave since she gave within the legal limits. She resents the implication that because she is an administrative assistant, she cannot afford to make the contribution. Such an allegation not only ignores the fact that she has another source of income, namely her husband, but it also passes judgment on how she chooses to spend her money.

24043564329



24043564330

Sandra L. Maloney

Sandra Maloney is a part-time clerk for the City of Brooklyn. Her husband is the Chief of Police in Brooklyn.

In October, 1986, Mayor Coyne asked Sandra if she would consider giving a contribution to Congressman Stokes. He suggested she could give as much as \$1,000. Sandra discussed the request with her husband. They decided they would make the contribution. They viewed it as a one time deal. Her check to Congressman Stokes is dated October 23, 1986.

Mayor Coyne did not give Sandra any money for the contribution. Neither her salary nor her husband's was raised. Their salaries are set by City Council. She was not worried that either her job or her husband's would be in jeopardy if she decided not to contribute.

Sandra is very upset over this whole matter. She does not understand why her political contributions are of anyone's concern or why it should be of anyone's concern how she chooses to spend her money. She has been so disheartened by the entire matter that she says it is highly unlikely she would ever contribute again to any political campaign.

24043564331

2 4 0 4 3 5 6 4 3 3 2

Joseph and Lois Pucci

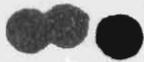
Joseph (Joe) and Lois Pucci have been friends with the Mayor and his wife for over forty years. At the time they contributed money to Congressman Stokes, Joe was the Fire Chief in Brooklyn.

In September 1986 and May 1988, Mayor Coyne asked Joe to consider giving money to Congressman Stokes. The Mayor had never asked Joe to do anything like this in the past. Joe and his wife are very loyal friends of the Coynes. Joe felt very strongly that if the Mayor wanted him to make a contribution, he would do it. Joe talked over making a contribution both times with Lois. They decided they would like to make the contributions and did so. Their checks were dated September 29, 1986 and May 27, 1988.

The Puccis decided they could afford the contributions. Their house was paid for and their children were grown and living on their own.

Mayor Coyne did not give the Puccis any money for the contribution. The Mayor did not give Joe a raise in salary to compensate for the contribution. Joe's salary was set by the City Council.

24043564333



2 4 0 4 3 5 6 4 3 3 4

Rootzel & Andrews
A Legal Professional Association
3009 Tammami Trail North
Suite 270, Collins Place I
Naples, Florida 33940

75 EAST MARKET STREET
AKRON, OHIO 44308-2098
(616) 376-2700
TELECOPIER (616) 378-4977

220 MARKET AVENUE, SOUTH
SUITE 320
CANTON, OHIO 44702
(616) 488-2700
TELECOPIER (616) 488-0546

37 WEST BROAD STREET
SUITE 800
COLUMBUS, OHIO 43215-4100
(614) 493-8770
TELECOPIER (614) 493-6782

SUITE 700, STANDARD BUILDING
330 ONTARIO STREET
CLEVELAND, OHIO 44113
(216) 622-0180
TELECOPIER (216) 661-2632

JOSEPH L. LAWSON
ROBERT G. MENZIES
JOHN CLAPPER, III*
JAMES A. PHELON
RICHARD A. HEUERMAN**
ARLENE F. AUSTIN

(813) 649-6200
1-(800) 638-7239

TELECOPIER (813) 261-3659

September 24, 1992

*BOARD CERTIFIED CIVIL TRIAL LAWYER
**LICENSED IN OHIO AND MICHIGAN ONLY

Robert Bauer, Esquire
Perkins Coie, Attorneys
607 Fourteenth Street N.W. - Suite 607
Washington, D.C. 20005

Re: Coyne Family

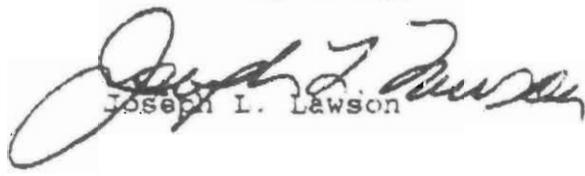
Dear Mr. Bauer:

The undersigned is a licensed attorney and CPA in both Ohio and Florida. For over twenty-five (25) years to date I have served as tax and financial counsel to John M. and Ruth Coyne, their children and grandchildren. Beginning in 1967 and more significantly during the 1980's to date, John M. Coyne and his wife, Ruth, have systematically on an annual basis made substantial gifts to their children and grandchildren.

I have prepared and/or reviewed all required gift tax returns which have been timely filed with the Internal Revenue Service. After 1981, the said gifts have generally equaled but not exceeded the annual gift tax exclusion amount of \$10,000 per year per donee under Section 2503(b) of the Internal Revenue Code. The said gifts have been comprised of either interests in real estate or the proceeds of the sale of such type or other investments. In May, 1988 gifts to certain children and grandchildren were completed shortly following a liquidation of a particular investment.

Please advise me if you require any additional information.

Yours very truly,


Joseph L. Lawson

JLL:rlh

24743564335

2 4 0 4 3 5 6 4 3 3 6

Members of Mayor Coyne's Family Receiving Gifts
on May 20, 1988 From the Liquidation
of an Investment

John Coyne, Jr.
Renee Coyne
Danny Coyne
Edward Coyne
Eddy Coyne
John Coyne, III
Eileen Coyne
James P. Coyne
Penny Dixon
Debra Dixon
James Dixon, Jr.
Marlene Rain

2 4 0 4 3 5 6 4 3 3 7



2 4 0 4 3 5 6 4 3 3 8

September 22, 1992

Robert Bauer
Perkins Cole
607 Fourteenth Street, N.W.
Washington, D.C. 20005-2011

Dear Bob:

I would like to express my feelings on the Federal Elections Commissions investigation of my donations to Congressman Louis Stokes.

First of all, I have no problem with an investigation of my donations, I do, however, have a problem with the manner in which Mr. Gudenas handled his allegations.

Mr. Gudenas held a press conference the day before an important election in the Democratic Party. The election was to elect a Chairman for the Cuyahoga County Democratic Party. At the press conference, he made accusations that illegal donations were made to Congressman Stokes. The timing of his allegations lead me to believe this was either a political ploy or that of a racial nature.

I received a call from a reporter from the Plain Dealer, a newspaper in Cleveland, the day before Mr. Gudenas' press conference questioning my donation. At no time was I told there was going to be a press conference so you can imagine the shock I experienced when my husband read the Saturday paper. After reading the article several times, I became very upset, part of my and my husband's personal finances were being exploited in Cleveland's largest newspaper. My husband became enraged, he is a very private individual with no political connections at all. This whole situation is causing a strain on my marriage.

We feel our rights have been violated. Mr. Gudenas should have asked for an investigation first before he went public involving innocent people. In the eyes of the public, I have been labeled a criminal. Mr. Gudenas has used people thru association to smear his opponent Congressman Louis Stokes and Mayor John Coyne. I can't help but feel there are others involved with Mr. Gudenas' allegations.

For several months, I have been he victim of public humiliation. The same day the article was written in the Cleveland Plain Dealer, I was in attendance at the meeting of the Precinct Committeemen to elect a Chairman for the Democratic Party. I was asked by several people there, to

24043564339

24043564340

"throw some of my money their way." Brooklyn Councilwoman Rita Brown made a sarcastic comment such as, Pamela, I saw your name in the paper today, very interesting. I went to my bank and was bombarded with comments and jokes of giving money to a "brother", and I must like "them" dark and "N... lover." My Mother has been teased at work about her daughter's contributions. I was even at an Open House at the elementary school for my 6 year old daughter, and was asked to help promote the school levy. When I explained I'm not sure how I felt about the levy, and that I feel money is being wasted in our schools, I was immediately chastised and told that I cared more about giving my money to political figures than I care about my own child's education. How unfair it is to have to take this criticism. It is as if I have to prove my innocence, rather than Mr. Gudenas prove my guilt. My whole family life has been affected by Gudenas' allegations. My husband has been harassed at work (he is a Fireman/Paramedic). He is constantly coming home upset by comments he has heard regarding our personal finances. Even while attending a Council meeting for the City of Brooklyn, Councilwoman Rita Brown made reference to articles written in the Sun Newspaper, the local paper, concerning Mr. Gudenas' allegations, she said, "Pamela, I see you made the paper again," with a chuckle.

I can no longer go through daily life without someone making comments about my private finances. I am not a public official, I have not asked to be publicly recognized, but I have been pulled into a cross-fire between Mr. Gudenas and his opponent.

Mayor Coyne would never ask me to do anything illegal, he has not been in office for over 53 years by coercing anyone into doing something. Mr. Gudenas has used his allegations as a political attack on his opponent. But in doing so, he has hurt my marriage and caused public humiliation on me and my family.

Sincerely,

Pamela Krickler

Pamela Krickler

2 4 0 4 3 5 6 4 3 4 1

September 24, 1992

Maryann Merce
8060 North Hills Drive
Broadview Heights, Ohio 44147

Robert Bower
Perkins Cole
Fourteenth Street, N. W.
Washington, D. C. 20005-1690

RE: Federal Elections Commission MUR 3558

Dear Bob:

Regarding Mr. Gudenas' complaint filed against me with the Federal Elections Commission relative to a contribution I made in 1990 to Congressman Louis Stokes' congressional campaign, I would like to state, for the record, the following: (1) how my contribution came about; (2) my ability to afford to make such a contribution; (3) my employment longevity with the city of Brooklyn and the manner in which I am compensated; (4) my personal opinions and suspicions regarding Mr. Gudenas' complaint; and finally, (5) my personal observations regarding this process.

In mid-July, 1990, Mayor John Coyne, asked if I would consider making a contribution to Congressman Lou Stokes' campaign indicating that \$1,000 was the maximum amount I could give. I said I probably could make a contribution but would have to discuss this with my husband and that I would let him know. I checked with some co-workers who had given to past campaigns as to whether they were asked and the amount they gave. For the record, Congressman Stokes is no stranger to me. Being a member of the Cuyahoga County Democratic Party I see him at various political and social Party functions. I've attended various 21st District Caucus events and functions at which Congressman Stokes was being honored. I've chatted with him numerous times on the phone and in person (he's been out to the city hall many times). He's a decent, down-to-earth man who takes time to listen to what you have to say. I regard him as a highly-respected and high-ranking Congressional leader, a powerhouse on the "hill" but one who never flaunts his political strength. A man who is responsive not only to the needs of his constituents but of the entire Northeast Ohio region. My husband and I agreed that since we both liked Lou Stokes and being a dual income household, a sizable contribution was certainly within our means. Add to that the fact that my husband's job allows him to come into occasional contact with Congressman Stokes. As a matter of fact, his place of employment is located in Stokes' congressional district. We decided to contribute \$1,000 to Congressman Stokes' campaign. I presented our personal check from our joint account, dated August 2nd, 1990 to Mayor Coyne and received a personal acknowledgement from Lou Stokes about a week and a half later. I never gave a second thought of the appearance of impropriety because we lived outside his Congressional District.

24043564342

Maryann Merce

2

Sep 25, 1992

I believe I can contribute to any candidate (male, female, black, white, etc.) campaign or issue of my choice--regardless of whether the contribution pertains to a candidate/campaign inside or outside my district, county or state; locale is irrelevant, especially today. The problems facing our cities extend far beyond our own backyards and certainly transcend municipal, congressional and state boundaries! I have to wonder if Mr. Gudenas would be making these accusations if I were a black male living outside the 21st District and not employed by, or associated with, Mayor Coyne!

I made this contribution of my own will, with my own money, and under no duress from Mayor Coyne, Congressman Stokes, or anyone else. I was never offered any monetary remuneration or job consideration or salary increase in exchange for this contribution.

24043564343

Regarding the affordability factor and Mr. Gudenas' ridiculous inferences that somehow I was compensated with a "high salary" for a low level position to make large donations of this nature, I'm glad Mr. Gudenas' believes I have a high salary but take exception to the inference that taxpayer monies may have been used in this manner. Mayor Coyne has achieved an impressive record of public service and has earned the public trust by being consistently re-elected to office. He runs a tight ship in his administration of local government and has received high marks on every financial audit of the city's accounting procedures. When I assumed the position of "administrative assistant to the mayor", I received the same salary--nothing more nor less, than my male predecessor received. Since being promoted to this position in 1983, I've received the same across-the-board percentage wage increases granted all other city employees--even though my job responsibilities are considerably greater than my male predecessor's were. My salary, like all city employees' salaries, is set by city council. I take exception to the fact that Mr. Gudenas' considers my position "lower level"--perhaps, he should have checked my job description, along with my wages, prior to making this accusation. I concur with him that I receive a "high salary" but believe I deserve a higher compensation than what I receive for the value of the work I do! I believe it's called "pay equity!"

Bear with me Bob, but you don't need to be a college graduate, which I am, to realize there's more to this whole thing than meets the eye. I can't help believe this whole thing is politically motivated, manufactured harassment, intended to defame the characters of not only Congressman Stokes but Mayor Coyne and everyone close to him. Furthermore, I believe that Mr. Gudenas' was provided my salary information from a Brooklyn councilwoman. I understand this councilwoman (Brown) demanded to have the salary information going back to '85 provided to her immediately and voiced her dissatisfaction as to the time it took the payroll clerk to put it together. She did have a payroll to get out! Was Brown under some type of deadline? There are some people on the Brooklyn Council who literally attack Mayor Coyne's reputation, integrity and character every chance they get and would enjoy nothing more than seeing him and those who serve under him disgraced and run out of office! Councilwoman Brown has closely aligned herself to a vocal opponent of Mayor Coyne's, who although he didn't live in Brooklyn, came to Brooklyn and stood outside the polls for seven hours to campaign for Mayor Coyne's opponent, and who also vigorously campaigned against Coyne's re-election as

Maryann Herce

3

Sep 25, 1992

party chairman, with Councilwoman Rita Brown sitting at his side. Brown herself made an unsuccessful attempt to repeal an ordinance which allowed the Mayor to serve as County Dem. Party Chairman.

I believe she was working with Mr. Gudenas on these complaints. Prior to filing these charges, Mr. Gudenas, an opponent of Congressman Louis Stokes, held a press conference regarding his suspicions of improper campaign donations and his intent to file a complaint with the FEC. Political? Yes. Comes with the territory? Yes. Timing? Most definitely, calculated. His press conference was held the day before precinct committeepersons gathered to elect a chairman of the Cuyahoga County Democratic Party. (Incidentally, Mayor Coyne won re-election as Party Chairman.)

Publicity given Gudenas' complaint has sparked inquiries from residents and family members, racial comments and slurs and served as the inspiration of many jokes which I personally don't think are very funny. Unlike my co-workers, I was spared the public humiliation of having my name and character questioned in the paper. But, nonetheless, I've been asked if I'm one of the "big-givers" and have been the subject of town gossip and racial jeers. I am a working wife and mother. I take pride in my family, and in what we have achieved working together. I take pride in my job and that fact that I put in an honest day's work for the compensation I earn. And believe me, it's not easy juggling career and motherhood. The demands on my time are great. I anguish from time to time whether my working full-time is in the best interests of my family. Within the past year, my husband has begun hounding me to quit work, get out of politics and stay home full-time to raise our son. Imagine his reaction when I received this Complaint. Truthfully, this Complaint and the nature in which it was made certainly added fuel to the fire and has been a source of anger and anxiety. More than ever, my husband thinks its time to call it quits. Even if I wanted to, which I don't, I wouldn't even consider it with these allegations pending!

I've voted in practically every election since the age of 18 and understand the importance of the electoral process. I have a total disregard for people who complain and moan about politics, government, the system, etc. yet don't bother to register and vote! I also understand that successful campaigns take time and money. Parenthood has allowed me to better appreciate the importance of civic responsibility and involvement with people and causes one believes will make a positive difference for future generations. I feel this way more so now than before as my son has entered kindergarten. Now I must focus on a multitude of issues from education to drugs to financing his college education. I've gotten a bit off track here haven't I? Which brings me to my final observation

I understand and respect Mr. Gudenas' right to file his suspicions in the form of a formal complaint with the Federal Elections Commission. I respect the privacy the FEC states will be given the matter during the course of the investigation. I only wish Mr. Gudenas' would have likewise respected my privacy and have taken this matter directly to this agency without airing his allegations to the media first. It is personally upsetting to me and my family that someone like Mr. Gudenas can question the amount of my contribution, my ability to afford this contribution and what motivated me to make a contribution was made to someone outside of my district. I am angry that some people choose to use taxpayer dollars for their own personal and

24043564344

Maryann Merce

4

Sep 25, 1992

political agendas. Elected public officials expect to be held up to such scrutiny. Citizens who act responsibly and in good faith do not. I wonder if Mr. Gudenas would question my contribution if he didn't know ahead of time who I worked for or was associated with. Just like Mr. Gudenas questioned my motivation for making my contribution, I question his motivation for making these allegations public at the exact time he did and whether he acted alone or received assistance from others in this what I consider to be "manufactured harassment" against the personal integrity of myself and my family. I know Mayor Coyne regrets every having asked us to make a contribution.

Thank you for agreeing to represent me in this matter. I've done nothing wrong. Therefore, it goes without saying that I will cooperate with the Commission with advice of Counsel. I only hope the FEC is made aware and considers the political maneuverings that were in motion prior to this complaint being filed and urge them to act quickly in conducting their investigation and reaching their determination.

Sincerely,

Maryann Merce
Maryann Merce

24043564345

9 4 0 4 3 5 6 4 3 4 6



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20543

September 29, 1992

Mr. Peter Luckianow
4170 Treadway
Beaumont, Texas 17206

RE: MUR 3558

Dear Mr. Luckianow:

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 was sent to you on July 23, 1992, but was returned due to an out-dated address. However, I have obtained your current address and accordingly have enclosed the original correspondence for your review.

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

Sincerely,

Veronica M. Gillespie
Veronica M. Gillespie
Attorney

Enclosure

94043564348

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

JUN 30 3 55 PM '94

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)

) Enforcement Priority
)

GENERAL COUNSEL'S QUARTERLY REPORT

I. INTRODUCTION

This report is the second Enforcement Priority System Quarterly Report. The purpose of this Quarterly Report is to recommend that the Commission no longer pursue the identified lower priority and stale cases.

II. CASES RECOMMENDED FOR CLOSING

A. Cases Not Warranting Further Pursuit Relative to Other Cases Pending Before the Commission

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission approved criteria

By closing such cases the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 16 cases which do not warrant further pursuit relative to the other pending cases.¹ A short

1. These matters are: MUR 3920; MUR 3930; MUR 3934; MUR 3939; MUR 3942; MUR 3943; MUR 3945; MUR 3948; MUR 3953; MUR 3955; MUR 3957; MUR 3964; MUR 3965; MUR 3967; RAD 94L-22; and RAD 94L-25.

94043564349

description of each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-16. For the Commission's convenience, the narratives for externally-generated matters are immediately followed by the complaint and response(s) and the narratives for internally-generated matters are immediately followed by the referral.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 42 cases that

do not warrant further investment of significant Commission resources.² Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate

2. These matters are: MUR 3132; MUR 3432; MUR 3466; MUR 3470; MUR 3473; MUR 3495; MUR 3558; MUR 3575; MUR 3581; MUR 3594; MUR 3600; MUR 3625; MUR 3647; MUR 3663; MUR 3684; MUR 3698; MUR 3712; MUR 3733; MUR 3744; MUR 3749; MUR 3756; MUR 3759; MUR 3767; MUR 3776; MUR 3779; RAD 92L-26, RAD 93L-25; RAD 93L-26; RAD 93L-29; RAD 93L-31; RAD 93L-33; RAD 93L-35; RAD 93L-36; RAD 93L-38; RAD 93L-39; RAD 93NF-02; RAD 93NF-03; RAD 93NF-06; RAD 93NF-10; RAD 93NF-12; RAD 93NF-15; and RAD 93NF-20.

94043564350

narratives for these cases. However, for externally-generated matters in which the Commission has made no findings, the complaint and response(s) are attached to the report and for internally-generated matters in which the Commission has made no findings, the referral is attached. See Attachments 17-53. Because the Commission has already made findings in five of the stale cases, no additional information is being attached to this report in regard to these cases.³

9 4 0 4 3 5 6 4 3 5 1

3. These matters are: MUR 3132, MUR 3432, MUR 3466, MUR 3495, and MUR 3733.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the identified cases effective August 1, 1994. This will allow the Legal Review Team adequate time to prepare the Pre-MUR and MUR files so that the cases can appear on the public record by September 1, 1994, within 30 days of the August 1, 1994, closing date. This timeframe also will enable this Office to prepare closing letters so that the letters can be mailed on August 2, 1994. Additionally, the Press Office will need time to review the files for inclusion in one of its press releases.

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file in the following matters to be effective on August 1, 1994:

- 1) RAD 92L-26
- 2) RAD 93L-25
- 3) RAD 93L-26
- 4) RAD 93L-29
- 5) RAD 93L-31
- 6) RAD 93L-33
- 7) RAD 93L-35
- 8) RAD 93L-36
- 9) RAD 93L-38
- 10) RAD 93L-39
- 11) RAD 94L-22
- 12) RAD 94L-25
- 13) RAD 93NF-02
- 14) RAD 93NF-03
- 15) RAD 93NF-06
- 16) RAD 93NF-10
- 17) RAD 93NF-12
- 18) RAD 93NF-15
- 19) RAD 93NF-20

94043564352

B. Take no action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3470
- 2) MUR 3473
- 3) MUR 3558
- 4) MUR 3575
- 5) MUR 3581
- 6) MUR 3594
- 7) MUR 3600
- 8) MUR 3625
- 9) MUR 3647
- 10) MUR 3663
- 11) MUR 3684
- 12) MUR 3698
- 13) MUR 3712
- 14) MUR 3744
- 15) MUR 3749
- 16) MUR 3756
- 17) MUR 3759
- 18) MUR 3767
- 19) MUR 3776
- 20) MUR 3779
- 21) MUR 3920
- 22) MUR 3930
- 23) MUR 3934
- 24) MUR 3939
- 25) MUR 3942
- 26) MUR 3943
- 27) MUR 3945
- 28) MUR 3948
- 29) MUR 3953
- 30) MUR 3955
- 31) MUR 3957
- 32) MUR 3964
- 33) MUR 3965
- 34) MUR 3967

9 4 0 4 3 5 6 4 3 5 3

C. Take no further action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3132
- 2) MUR 3432
- 3) MUR 3466
- 4) MUR 3495
- 5) MUR 3733

6/30/94
Date


Lawrence M. Noble
General Counsel

94043564354

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Enforcement Priority) Agenda Document
#X94-72

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on July 19, 1994, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions with respect to Agenda Document #X94-72:

A. Decline to open a MUR and close the file in the following matters to be effective on August 1, 1994:

- 1) RAD 92L-26
- 2) RAD 93L-25
- 3) RAD 93L-26
- 4) RAD 93L-29
- 5) RAD 93L-31
- 6) RAD 93L-33
- 7) RAD 93L-35
- 8) RAD 93L-36
- 9) RAD 93L-38
- 10) RAD 93L-39
- 11) RAD 94L-22
- 12) RAD 94L-25
- 13) RAD 93NF-02
- 14) RAD 93NF-03
- 15) RAD 93NF-06
- 16) RAD 93NF-10
- 17) RAD 93NF-12
- 18) RAD 93NF-15
- 19) RAD 93NF-20

(continued)

74043564355

Federal Election Commission
Certification: Enforcement Priority
July 19, 1994

Page 2

B. Take no action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3470
- 2) MUR 3473
- 3) MUR 3558
- 4) MUR 3575
- 5) MUR 3581
- 6) MUR 3594
- 7) MUR 3600
- 8) MUR 3625
- 9) MUR 3647
- 10) MUR 3663
- 11) MUR 3684
- 12) MUR 3698
- 13) MUR 3712
- 14) MUR 3744
- 15) MUR 3749
- 16) MUR 3756
- 17) MUR 3759
- 18) MUR 3767
- 19) MUR 3776
- 20) MUR 3779
- 21) MUR 3920
- 22) MUR 3930
- 23) MUR 3934
- 24) MUR 3939
- 25) MUR 3942
- 26) MUR 3943
- 27) MUR 3945
- 28) MUR 3948
- 29) MUR 3953
- 30) MUR 3955
- 31) MUR 3957
- 32) MUR 3964
- 33) MUR 3965
- 34) MUR 3967

(continued)

74043564356

C. Take no further action, close the file effective on August 1, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3132
- 2) MUR 3432
- 3) MUR 3466
- 4) MUR 3495
- 5) MUR 3733

Commissioners Aikens, Elliott, McDonald, McGarry, Potter, and Thomas voted affirmatively for the decision.

Attest:

7-20-94
Date

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

74043564357



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 2, 1994

Edmund V. Gudenas
Citizens for a Bright Light
24555 Lakeshore Blvd.
Euclid, OH 44123

RE: MUR 3558

Dear Mr. Gudenas:

On July 22, 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 exercised its prosecutorial discretion to take no action in the matter. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994. 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,

Mary L. Taksar

Mary L. Taksar
Attorney

24043564358



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 2, 1994

Stan Brand, Esq.
Brand and Lowell
923 15th Street, N.W.
Washington, DC 20005

RE: MUR 3558
Representative Louis Stokes, Louis
Stokes for Congress Committee and
Cheryle A. Wills, as Treasurer

Dear Mr. Brand:

On July 23, 1992, the Federal Election Commission notified your clients, Representative Louis Stokes, Louis Stokes for Congress Committee and Cheryle A. Wills, 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 exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

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 Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

94043564359



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUG 02 1994

Kevin P. Weiler, Esq.
Weiler and Weiler
8920 Brecksville Road
Brecksville, OH 44141

RE: MUR 3558
Jeanie Joyce, Brenda S. Hartel,
and Robert J. Mickey

Dear Mr. Weiler:

On July 23, 1992, the Federal Election Commission notified your clients, Jeanie Joyce, Brenda S. Hartel, and Robert J. Mickey, 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 exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

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 Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

94043564360



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 2, 1994

Peter Luckianow
4170 Treadway
Beaumont, TX 17206

RE: MUR 3558
Peter Luckianow

Dear Mr. Luckianow:

On July 23, 1992, the Federal Election Commission notified you 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 exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

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 Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

94043564361



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 2, 1994

Candace R. Vitas
252 Gayle Drive
Sheffield Lake, OH 44054-1913

RE: MUR 3558
Candace R. Vitas

Dear Ms. Vitas:

On July 23, 1992, the Federal Election Commission notified you 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 exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

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 Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

94043564362



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 2, 1994

Robert F. Bauer, Esq.
Perkins Coie
607 Fourteenth Street, N.W.
Washington, DC 20005-2011

RE: MUR 3558
John M. Coyne, Ruth Coyne,
Debra Dixon, James Dixon, Jr.,
Jeanette Coyne, Marlene Rain,
James Coyne, Mary Coyne,
Pamela Krickler, Maryann Merce,
Sandra L. Maloney, Penny Dixon,
Joseph Pucci and Lois Pucci

Dear Mr. Bauer:

On July 23, 1992, the Federal Election Commission notified your clients, noted above, 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 exercised its prosecutorial discretion to take no action against your clients. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

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.

94043564363

Robert K. Bauer, Esq.
Page Two

If you have any questions, please contact Joan McEnergy at
(202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

24043564364



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 2, 1994

Paulette C. Higgins
Westbrook Village
3879 West 36th Street
Cleveland, OH 44109

RE: MUR 3558
Paulette C. Higgins

Dear Ms. Higgins:

On July 23, 1992, the Federal Election Commission notified you 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 exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

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 Joan McEnery at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

24043564365



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

August 2, 1994

Kathleen Rolland
4002 Bush Avenue
Cleveland, OH 44109

RE: MUR 3558
Kathleen Rolland

Dear Ms. Rolland:

On July 23, 1992, the Federal Election Commission notified you 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 exercised its prosecutorial discretion to take no action against you. This case was evaluated objectively relative to other matters on the Commission's docket. In light of the information on the record, the relative significance of the case, and the amount of time that has elapsed, the Commission determined to close its file in this matter on August 1, 1994.

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 Joan McEneary at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

24043564366



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3558

DATE FILMED 8-31-84 CAMERA NO. 2

CAMERAMAN JMK

94043564367