



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3873

DATE FILMED 12-14-91 CAMERA NO. 2

CAMERAMAN JMH

4043593670

BEFORE THE
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

CENTER FOR RESPONSIVE POLITICS

1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

v.

Complainant,

Jonathan M. Tisch

Respondent,

COMPLAINT

MUR 3873

94 JAN 21 PM 4:31

RECEIVED
FEDERAL ELECTION COMMISSION

COMPLAINT OF CENTER FOR RESPONSIVE POLITICS

1. This complaint charges that the respondent has violated the Federal Election Campaign Act, 2 U.S.C. § 431 et seq., as amended ("FECA"), by making aggregate contributions in excess of the limits permitted by the FECA.

PARTIES

2. The complainant, the Center for Responsive Politics, is a nonprofit, nonpartisan research group incorporated in the State of Iowa and headquartered in Washington, D.C., that studies Congress and related issues. Founded in 1983, it was designed to research matters concerning the organization and operation of Congress as an institution and to examine potential reforms that could improve both its internal operation and its responsiveness to the American public. The patterns of contributions of money to federal candidates has been one of its chief areas of study.

3. The respondent is an individual contributor to various candidates and political committees.

14043593671

APPLICABLE STATUTES AND REGULATIONS

4. The FECA limits contributions by any one individual to an aggregate total of \$25,000 per calendar year. Contributions to a candidate or the candidate's authorized committee made in a year other than the calendar year of the election with respect to which the contribution is made are considered to be made during the calendar year in which such election is held. 2 U.S.C. § 441a(a)(3); 11 C.F.R. § 110.5.

GROUND FOR COMPLAINT

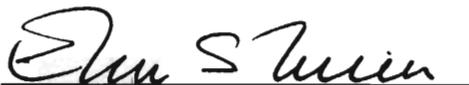
5. According to FEC records, respondent Jonathan M. Tisch made contributions subject to FECA in the amounts and to the persons identified in the list attached to this complaint as Exhibit 1. Attached as Exhibit 2 are copies of the FEC records for each contribution listed in Exhibit 1. All exhibits reflect the records on file at the FEC as of December 15, 1993.

6. On information and belief, respondent Jonathan M. Tisch made contributions attributed to the 1992 calendar year in the amount of \$37,000. These contributions exceeded by \$12,000 the \$25,000 contribution limit imposed by the FECA and Commission regulations on all contributions by any individual in a calendar year.

RELIEF

7. The Center for Responsive Politics respectfully urges the Commission to conduct a prompt and thorough investigation into the allegations in this Complaint, and to declare that the Respondent has violated the FECA and Commission regulations.

Respectfully submitted,



Ellen S. Miller
Executive Director
CENTER FOR RESPONSIVE POLITICS
1320 19th Street, N.W.
Washington, D.C. 20036
(202) 857-0044

Date: January 14, 1994

1 4 0 4 3 5 9 3 6 7 2

TISCH, JONATHAN M
Contributions Attributed to 1992

Exhibit 1

Summary of FEC Data

Recipient	Amount	Date	FEC Microfilm Location
Abrams, Robert	\$500	06/30/92	92SEN/014/0633
Bush, George	\$1,000	04/01/92	92FEC/752/2977
Bush, George	\$-1,000	05/29/92	92FEC/752/5723
Bush, George	\$1,000	11/14/91	92FEC/731/0723
Clinton, Bill	\$1,000	12/30/91	93FEC/817/5298
Democratic National Cmte	\$10,000	07/31/92	92FEC/774/5138
Democratic Senatorial Campaign Cmte	\$250	10/28/92	92SEN/029/0622
Democratic Senatorial Campaign Cmte	\$250	10/28/92	92SEN/030/5267
Ferraro, Geraldine	\$1,000	09/10/92	92SEN/025/0104
Kerry, Robert	\$1,000	12/08/92	93FEC/817/1512
Levine, Mel	\$1,000	05/14/92	92SEN/015/3387
Republican National Cmte	\$20,000	09/18/92	92FEC/792/4433
Specter, Arlen	\$1,000	03/26/91	91SEN/007/0164

4
7
6
3
9
5
3
4
0

Total Contributions Attributed to 1992: \$37,000

Jonathan M. Tisch
Exhibit 2

4043593675

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: FERRARO FOR U.S. SENATE

A> FULL NAME & ADDRESS:	NAME OF EMPLOYER:	DATE	AMOUNT
Monte, Paul 245-10 Grand Central Parkway Bellerose, NY 11426	Monte Excelsior	09/10/92	\$300.00
	OCCUPATION: owner		
RECEIPT FOR: Primary	AGGREGATE YEAR-TO-DATE: \$300.00		
B> FULL NAME & ADDRESS:	NAME OF EMPLOYER:	DATE	AMOUNT
Steinberg Tisch, Laura 167 Madison Ave NY, NY 10021	N/A	09/10/92	\$1,000.00
	OCCUPATION: Homemaker		
RECEIPT FOR: Primary	AGGREGATE YEAR-TO-DATE: \$1,000.00		
C> FULL NAME & ADDRESS:	NAME OF EMPLOYER:	DATE	AMOUNT
Tisch, Jonathan 167 Madison Ave NY, NY	Loews Hotels	09/10/92	\$1,000.00
	OCCUPATION:		✓
RECEIPT FOR: Primary	AGGREGATE YEAR-TO-DATE: \$1,000.00		
D> FULL NAME & ADDRESS:	NAME OF EMPLOYER:	DATE	AMOUNT
Siegel, Gloria 211 Central Park West NY, NY 10024	Siegel & Gale	09/10/92	\$1,000.00
	OCCUPATION: Executive		
RECEIPT FOR: Primary	AGGREGATE YEAR-TO-DATE: \$1,000.00		
E> FULL NAME & ADDRESS:	NAME OF EMPLOYER:	DATE	AMOUNT
Cohen, Joshua 15 West 81st Street New York, NY 10024	n/a	09/10/92	\$1,000.00
	OCCUPATION: student		
RECEIPT FOR: Primary	AGGREGATE YEAR-TO-DATE: \$1,000.00		
F> FULL NAME & ADDRESS:	NAME OF EMPLOYER:	DATE	AMOUNT
Wilson, Richard 170 Westminister Road Rochester, NY 14607	Information requested	09/10/92	\$300.00
	OCCUPATION:		
RECEIPT FOR: Primary	AGGREGATE YEAR-TO-DATE: \$300.00		
G> FULL NAME & ADDRESS:	NAME OF EMPLOYER:	DATE	AMOUNT
Barnoff, Elisabeth 151 Central Park West New York, NY 10023	Information requested	09/10/92	\$550.00
	OCCUPATION:		
RECEIPT FOR: Primary	AGGREGATE YEAR-TO-DATE: \$550.00		

TOTAL This Period (last page this line number only)

MODULE A

ITEMIZED RECEIPTS

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.

DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE

Name, Mailing Address and ZIP Code	Employer/ Occupation	Date	Amount
Lester C. Thurov Sloan School of Management Cambridge, MA 02139	M.I.T. University Economist	10/19/92	\$2,500.00
		10/29/92	\$25.00
	Y-T-D		\$7,025.00
William H. Tillson 156 Stagecoach Rd. Bell Canyon, CA 91307	Broadway Calde Services President	10/26/92	\$1,000.00
	Y-T-D		\$1,000.00
Steven E. Tisch 3815 Hughes Ave. Culver City, CA 90232	Self Producer	10/22/92	\$1,000.00
	Y-T-D		\$1,000.00
Jonathan M. Tisch 667 Madison Ave. New York, NY 10021	Loews Hotels CEO/President	10/28/92	\$250.00
	Y-T-D		\$250.00
William A.K. Titelman 240 North Third Street Suite 600 Harrisburg, PA 17110	Klett Lieber Rooney & Schorling Attorney	10/15/92	\$500.00
		10/29/92	\$500.00
	Y-T-D		\$1,000.00
Robert J. Tomsich 1465 Roundwood Drive Lanting Valley, OH 44022	Information Requested	10/16/92	\$5,000.00
	Y T-D		\$10,000.00
Joshua Trabulus 435 N. Roxbury Dr. Suite 300 Beverly Hills, CA 90210	Self Doctor	10/22/92	\$500.00
	Y-T-D		\$500.00
Subtotal of Receipts This Page			\$11,275.00

222
0622
0000
9

SCHEDULE A-P
 ITEMIZED RECEIPTS
 Contributions from Individuals/Persons

PAGE 33 OF 37
 FOR LINE NUMBER 17(a)(1)

NAME OF COMMITTEE (in Full)
 KERRY FOR PRESIDENT, INC. 000254250

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.

Full Name Mailing Address	Name of Employer Occupation	Date MM/DD/YY	Amount
Mary K. T. Teffenhart-Riesick 922 Napoli Drive Pacific Palisades, CA 90272-	Information Requested Information Requested	12/29/92	\$250.00
Receipt for (X)Primary	Aggregate YTD >		\$250.00
Stephen Tenenbaum c/o Savitsky, Satin & Galbeles 1901 Ave. of the Stars, #1450 Los Angeles, CA 90067-	Information Requested Information Requested	12/03/92	\$250.00
Receipt for (X)Primary	Aggregate YTD >		\$250.00
Bob C. Finstman 2809 Avenue E Kearney, NE 68847-	Information Requested Information Requested	12/02/92	\$100.00
Receipt for (X)Primary	Aggregate YTD >		\$200.00
Alice M. Tiesch 575 Park Avenue Apt. 1607 New York, NY 10021-	Information Requested Information Requested	12/09/92	\$1000.00
Receipt for (X)Primary	Aggregate YTD >		\$1000.00
Jonathan M. Tiesch 667 Madison Avenue New York, NY 10021-	Information Requested Information Requested	12/08/92	\$1000.00
Receipt for (X)Primary	Aggregate YTD >		\$1000.00
Solomon D. Trujillo 8564 East Aster Drive Scottsdale, AZ 85260-	Information Requested Information Requested	12/07/92	\$250.00
Receipt for (X)Primary	Aggregate YTD >		\$250.00
Courtney Valentini 407 W. Sycamore Avenue Number 5 Los Angeles, CA 90036-	Information Requested Information Requested	12/11/92	\$1000.00
Receipt for (X)Primary	Aggregate YTD >		\$1000.00
SUBTOTAL of Receipts This Page.....>			\$3850.00
TOTAL This Period.....>			

4, 3, 4, 3, 5, 9, 3, 3, 6, 2, 9



ITEMIZED RECEIPTS

OCTOBER 1 - DECEMBER 31, 1991

Any information copied from this report may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes.

NAME/MAILING ADDRESS	FOR	DATE	AMOUNT
Tilton, Robert (Mr.) 1324 South Topeka Boulevard Topeka KS 66612	P 92	10-15-91	250.00

EMP: Tilton & Hoffman, P.A.

OCC: Attorney

AGGREGATE YTD: \$ 250.00

Tippett, W. Lyndo (Mr.) 509 Valley Road Fayetteville NC 28305	P 92	12-04-91	300.00
---	------	----------	--------

EMP: Tippett, Padrick, Faircloth & Bryan

OCC: CPA

AGGREGATE YTD: \$ 300.00

Tippin, IV, William A. (Mr.) 4628 Albemarle Street, N.W. Washington DC 20016	P 92	12-27-91	250.00
--	------	----------	--------

EMP: Envirocontrol Incorporated

OCC: Executive

AGGREGATE YTD: \$ 250.00

Tisch, James S. (Mr.) 9 East 79th Street New York NY 10021	P 92	12-30-91	1,000.00
--	------	----------	----------

EMP:

OCC:

AGGREGATE YTD: \$1,000.00

Tisch, Jonathan M. (Mr.) 667 Madison Avenue New York NY 10021	P 92	12-30-91	1,000.00
---	------	----------	----------

EMP: Loews Hotels

OCC: President/CEO

AGGREGATE YTD: \$1,000.00

Tisch, Laura Steinberg (Mrs) 33 East 70th Street New York NY 10021	P 92	12-30-91	1,000.00
---	------	----------	----------

EMP:

OCC: Unemployed

AGGREGATE YTD: \$1,000.00

SUBTOTAL of receipts this page - 3,800.00

ITEMIZED REPORT COVERING PERIOD FROM 9/01/92 THRU 9/30/92 OVER \$200.00

140433593631

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	THIS CALENDAR PERIOD	YR-TO-DATE
Mr. & Mrs. John P. Tinsley Box 1, Box 447 Scioto PA 18354	INFORMATION REQUESTED 09/22/92	09/22/92	\$100.00	\$240.00
Mrs. Patsy J. Tippers Route 1 Hesson OK 73660	Self-employed	09/29/92	\$100.00	\$300.00
Mr. Jonathan Tisch Loews Hotels 667 Madison Avenue New York NY 10021	Executive Loews Hotels	09/18/92	\$20,000.00	\$20,000.00
Mr. Joe F. Tiser 1405 Church Street Columbia MS 39429	INFORMATION REQUESTED 09/22/92	09/22/92	\$35.00	\$210.00
Mr. Woodbury C. Titcomb Peoples Bank Building Peoples Savings Bank Worcester MA 01608	Banker Peoples Savings Bank	09/14/92	\$1,000.00	\$1,000.00
Mr. Donald S. Titas 2265 Melville Drive Pasadena CA 91108	Insurance Agent Ralph D. Wilcox Company	09/01/92	\$100.00	\$500.00
Mr. Jerry Tobias 18075 Ventura Boulevard Encino CA 91316	Self-employed Auto Luck Lease Sales Agency Co	09/09/92	\$200.00	\$750.00
Mr. Richard L. Tobiasson 1231-D Kirks Road Troy MI 48064	INFORMATION REQUESTED 09/29/92	09/29/92	\$50.00	\$239.00
Mr. Harlan H. Todd 111 E. Findlay Street Dayton OH 45433	Businessman The Sayton Forging Heat Treat	09/24/92	\$1,000.00	\$1,000.00
Mr. John H. Todd Apartment 512 1111 Indian Avenue Scottsdale AZ 85212	Attorney Self-employed	09/22/92	\$19.92	\$219.92

SCHEDULE A-P

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

ITEMIZED RECEIPTS

Use columns scheduled for each category of the detailed summary page	PAGE	OF TOTAL PAGES
	712	1200
LINE NUMBER		17a

NAME OF COMMITTEE (in Full)
DEMOCRATIC '92 PRIMARY COMMITTEE

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

NAME ADDRESS CITY STATE ZIP CODE	NAME OF EMPLOYER	DATE (MONTH, DAY, YEAR)	AMOUNT OF EACH RECEIPT THIS PERIOD
Drusdale, Mr. Don H. 212 Villa Point Dr. Newport Beach, CA 92660	ERLIND JORDAN, and MRS. JORDAN OCCUPATION: Attorney RECEIPT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General AGGREGATE YEAR TO DATE: \$500.00	11/25/91	\$500.00
Pendergast, Mr. Russell A. 5 Pine Ridge Road Milton, CT 06097	The Rockefeller Group OCCUPATION: Vice President RECEIPT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General AGGREGATE YEAR TO DATE: \$1,000.00	11/14/91	\$1,000.00
Levin, Mr. Neil D. 45 East End Avenue, Apt. 18F New York, NY 10028	Goldman Sachs OCCUPATION: Investment Banker RECEIPT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General AGGREGATE YEAR TO DATE: \$1,000.00	11/14/91	\$1,000.00
Tisch, Mr. Jonathan H. 667 Madison Avenue New York, NY 10021	Loews Hotels OCCUPATION: CEO RECEIPT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General AGGREGATE YEAR TO DATE: \$1,000.00	11/14/91	\$1,000.00
Beverly, Ms. Delia 160 East 38th Street Apt. 3A New York, NY 10016	Info Requested OCCUPATION: Info Requested RECEIPT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General AGGREGATE YEAR TO DATE: \$1,000.00	11/14/91	\$1,000.00
Waldron, Mr. Dale F. 6 Wildwood Rd. Ardenham, NY 10538	Wildwood Corp. OCCUPATION: Industrialist RECEIPT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General AGGREGATE YEAR TO DATE: \$1,000.00	11/14/91	\$1,000.00
Waldron, Mr. Dale F. 6 Wildwood Rd. Ardenham, NY 10538	Wildwood Corp. OCCUPATION: Industrialist RECEIPT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General AGGREGATE YEAR TO DATE: \$1,000.00	11/14/91	\$1,000.00
Waldron, Mr. Dale F. 6 Wildwood Rd. Ardenham, NY 10538	Wildwood Corp. OCCUPATION: Industrialist RECEIPT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General AGGREGATE YEAR TO DATE: \$1,000.00	11/14/91	\$1,000.00

11/25/91
11/14/91
11/14/91
11/14/91
11/14/91
11/14/91
11/14/91

REPRINTED FROM THE FEDERAL ELECTION COMMISSION

TOTAL THIS PERIOD (last page this line number)

Redesignation Request

ISSUED SECTION
 SRC SERVICES CORPORATION/DEMOCRATIC NATIONAL COMMITTEE
 SCHEDULE A

NAME
 ADDRESS
 CITY STATE ZIPCODE

 OCCUPATION
 EMPLOYER

 YTD
 AGGREGATE

 DATE

 AMOUNT
 PERIOD

Mr. Sarah Tietze
 The Pines Cottage 411
 400 Avinger Ln.
 Davidson, NC 28016
 REQUESTED 2,000.00 7/30/92 1,000.00

Ms. Virginia Timberlake
 1067 University Pl
 Schenectady, NY 12308
 REQUESTED 300.00 7/26/92 300.00

8
 5
 1
 3
 8

Mr. Joe-Shiao Ting
 9017 Wallisville
 Houston, TX 77013
 REQUESTED 300.00 7/26/92 300.00

7
 3
 7
 2
 0

Mr. Rosellina Ting
 1032 Billoide Rd.
 Wynnewood, PA 19096
 REQUESTED 250.00 7/27/92 250.00

Mr. Jonathan Tisch
 33 East 70th Street
 New York, NY 10021
 REQUESTED 10,000.00 7/31/92 10,000.00



SCHEDULE D-P

Form 1041-92
 Washington, D.C. 20540

FINANCED DISBURSEMENTS

NAME OF THE COMMITTEE OR CANDIDATE
 DATE OF THE REPORT
 PERIOD FOR WHICH MADE
 17
 20

NAME OF COMMITTEE OR CANDIDATE

DEM - CIVILE '92 PRIMARY COMMITTEE, INC.

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

DATE
 MONTH, DAY, YEAR

AMOUNT OF EACH DISBURSEMENT THIS PERIOD

NAME, ADDRESS, CITY, STATE, ZIP CODE	PURPOSE OF DISBURSEMENT	DATE MONTH, DAY, YEAR	AMOUNT OF EACH DISBURSEMENT THIS PERIOD
Mr. Dean L. Coleman 1089 North Ocean Blvd. Palm Beach, FL 33480	Contribution Refund DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	27-MAY-92	\$1,000.00
Mr. P. Saryl Braun 2334 Woodfern Circle Birmingham, AL 35244	Contribution Refund DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07-MAY-92	\$1,000.00
Mr. Catherine G. Adler 1989 S. Ocean Blvd. Palm Beach, FL 33480	Contribution Refund DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	27-MAY-92	\$1,000.00
Mr. James P. Bennett 3882 Gorton River Trail Birmingham, AL 35248	Contribution Refund DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07-MAY-92	\$1,000.00
Mr. Jonathan B. Tish 657 Madison Ave. New York, NY 10021	Contribution Refund DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	29-MAY-92	\$1,000.00
Mr. Aaron Bass 3160 Highland Dr. Birmingham, AL 35285	Contribution Refund DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07-MAY-92	\$1,000.00
Mr. David L. Princy 19 S. First Street Minneapolis, MN 55401	Contribution Refund DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	29-MAY-92	\$250.00
Mr. Harold E. Seley III 616 Berens St. New Orleans, LA 70113	Voided Check DISBURSEMENT FOR: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	07-MAY-92	-\$1,000.00
SUBTOTAL OF DISBURSEMENTS THIS PAGE (optional)			\$5,250.00
TOTAL THIS PERIOD (see page 41a (line number only))			

4204337592569824



SCHEDULE A-P

Federal Election Commission
 1100 Pennsylvania Avenue, N.E.
 Washington, D.C. 20003

ITEMIZED RECEIPTS

Use separate schedule for each receipt of the qualified summary page

LINE NUMBER	17a
OF RECEIPTS	44

NAME OF CONTRIBUTOR		DATE (MONTH, DAY, YEAR)		AMOUNT OF EACH RECEIPT THIS PERIOD
SUB-SHYLE '92 PRIMARY COMMITTEE, INC.				
<p>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.</p>				
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT	
Cover, Mrs. Leone H. Apt. 2102 8140 Township Line Rd. Indianapolis, IN 46260	Retired AGGREGATE YEAR-TO-DATE \$385.00	04/21/92	\$215.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT	
Yoder, Mrs. Marie J. 59546 C.R. 31 Middlebury, IN 46540	Jayco Inc. Exec. AGGREGATE YEAR-TO-DATE \$250.00	04/20/92	\$250.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT	
Smith, Ms. Ida H. 4 West Street Rohant, NY 13407	Info Requested Info Requested AGGREGATE YEAR-TO-DATE \$275.00	04/20/92	\$25.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT	
Hale, Mrs. Helene L. 1130-16 Roadside Drive Vista, CA 92084	Homemaker AGGREGATE YEAR-TO-DATE \$270.00	04/17/92	\$130.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT	
Pleuro, Mr. Raymond E. 15 Lucette Ave. Old Orchard Beach, ME 04064	Retired AGGREGATE YEAR-TO-DATE \$215.00	04/17/92	\$40.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT	
Willican, Dr. Richard D. 2717 Wilmington Dickinson, TX 77539	Self Dentist AGGREGATE YEAR-TO-DATE \$300.00	04/10/92	\$100.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT	
Ortino, Ms. Mildred H. 2525 E. 1st St. Apt. 1606 Fort Myers, FL 33901	Retired AGGREGATE YEAR-TO-DATE \$300.00	04/23/92	\$25.00	
NAME, ADDRESS, CITY, STATE, ZIP CODE	NAME OF EMPLOYER	DATE	AMOUNT	
Loew, Mr. Jonathan H. 167 Madison Avenue New York, NY 10021	Loews Hotels CEO AGGREGATE YEAR-TO-DATE \$1,000.00	04/01/92	\$1,000.00 ✓	
SUBTOTAL OF RECEIPTS THIS PAGE (optional)			\$1,790.00	
TOTAL THIS PERIOD (last page this line number only)				

14043593685



*-Reattribution or Resignation Requested

Any info copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contrib. or for commercial purpose, other than using name & addr. of a political comm. to solicit from the comm.

Full Name of Committee: Citizens For Arlen Specter

A: Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Donald Tober 620 Park Avenue New York NY 10021	Sugar Foods Manufacturing	03/26/91	500.00

Receipt for: GENERAL Total: \$ 500.00

A: Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Charles Duncan 1412 Upshur Street, N. W. Washington DC 20011	Reid & Priest Legal	03/26/91	500.00

Receipt for: PRIMARY Total: \$ 500.00

A: Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Jonathan Tisch Loews Corporation New York NY 10021	Loews Corporation Info Requested	03/26/91	1000.00

Receipt for: PRIMARY Total: \$ 1000.00

A: Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Preston Tisch 666 Fifth Avenue New York NY 10019	Loews Corp. Info Requested	03/27/91	1000.00

Receipt for: PRIMARY Total: \$ 1000.00

A: Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
James Tisch 667 Madison Avenue New York NY 10021	Loews Corporation Info Requested	03/27/91	500.00

Receipt for: PRIMARY Total: \$ 500.00

A: Full Name, Address, Zip	Employer/Occupation	Date	Receipts Memo
Ernest Boden 200 Central Park South New York NY 10019	Info Requested Info Requested	03/27/91	250.00

Receipt for: PRIMARY Total: \$ 150.00

GRAND TOTAL of Receipts This Form \$ 3,150.00

9104
538
846
846

SCHEDULE A

ITEMIZED RECEIPTS

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

PAGE 150 OF 205
FOR LINE NUMBER 11 (a) (1)

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)			
Abrams '92			
A Full Name, Mailing Address and ZIP Code Jonathan Tisch 33 East 70th Street 10F New York, NY 10021 Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Name of Employer Loews Corporation Occupation President & CEO Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 06/30/1992	Amount of Each Receipt this Period 500.00
B Full Name, Mailing Address and ZIP Code Steven E. Tisch The Steve Tisch Company 3815 Hughes Avenue Culver City, CA 90232-2715 Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Name of Employer The Steve Tisch Company Occupation President Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 06/30/1992	Amount of Each Receipt this Period 1000.00
C Full Name, Mailing Address and ZIP Code Glen A. Tobias Bear Stearns & Co. 245 Park Avenue New York, NY 10167 Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Name of Employer Bear Stearns & Company Occupation Investment Banker Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 06/24/1992	Amount of Each Receipt this Period 1000.00
D Full Name, Mailing Address and ZIP Code Darius A. Toraby 1243 Hardscrabble Road Chappaqua, NY 10514 Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Name of Employer Thompson, Robinson, Toraby, P.C. Occupation Partner Aggregate Year-to-Date > \$ 300.00	Date (month, day, year) 06/16/1992	Amount of Each Receipt this Period 300.00
E Full Name, Mailing Address and ZIP Code Carl E. Touhey Pine West Plaza, Bldg. # 2 Washington Avenue Extension Albany, NY 12205 Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Name of Employer Touhey Associates Occupation President Aggregate Year-to-Date > \$ 1000.00	Date (month, day, year) 06/29/1992	Amount of Each Receipt this Period 1000.00
F Full Name, Mailing Address and ZIP Code A. Robert Towbin 1010 Fifth Avenue Apartment 11-B New York, NY 10028 Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Name of Employer Lehman Brothers Occupation Managing Director Aggregate Year-to-Date > \$ 500.00	Date (month, day, year) 06/26/1992	Amount of Each Receipt this Period 500.00
G Full Name, Mailing Address and ZIP Code Gary Trachten 10 West 15th Street, #3N North New York, NY 10011 Receipt For <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)	Name of Employer Kudman & Trachten Occupation Attorney Aggregate Year-to-Date > \$ 250.00	Date (month, day, year) 06/23/1992	Amount of Each Receipt this Period 250.00

SUBTOTAL of Receipts This Page (optional) 4,550
 TOTAL This Period (all pages this line number only) 678,833.98



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 28, 1994

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 3873

Dear Ms. Miller:

This letter acknowledges receipt on January 21, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"), by Jonathan M. Tisch. The respondent will be notified of this complaint within five days.

You will be notified as soon as the Federal Election Commission takes final action on your complaint. Should you receive any additional information in this matter, please forward it to the Office of the General Counsel. Such information must be sworn to in the same manner as the original complaint. We have numbered this matter MUR 3873. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

14043593689



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

January 28, 1994

Jonathan M. Tisch
667 Madison Avenue
New York, NY 10021

RE: MUR 3873

Dear Mr. Tisch:

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 3873. 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.

4043593690

Jonathan M. Tisch
Page 2

If you have any questions, please contact Joan McEnery at (202) 219-3400. For your information, we have enclosed a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

4043593691



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20546

FEB 13 1984

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
228 South Washington Street
Suite 200
Alexandria, VA 22314

RE: MUR 3873

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which indicates that the Bush-Quayle '92 Primary Committee, Inc. ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 3873. Please refer to this number in all future correspondence.

Under the Act, you have the opportunity to demonstrate in writing that no action should be taken against the Committee and you, as treasurer, in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

4043593692

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
Page 2

If you have any questions, please contact Joan McEnery at
(202) 219-3400. For your information, we have enclosed a brief
description of the Commission's procedures for handling
complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

404335933693

WILEY, REIN & FIELDING

1778 K STREET, N.W.
WASHINGTON, D. C. 20006
(202) 429-7000

February 14, 1994

JAN WITOLD BARAN
(202) 429-7330

RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

Feb 16 9 00 AM '94

FACSIMILE
(202) 429-7049
TELEX 248348 WYRN UR

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

ATTN: Mary L. Taksar

Re: MUR 3873 (Jonathan M. Tisch)

Dear Madams and Sirs:

This office represents Jonathan M. Tisch in the above-captioned matter. Enclosed please find an executed Statement of Designation of Counsel to that effect.

Mr. Tisch received the Complaint filed by the Center for Responsive Politics ("Complainant") and has asked us to respond on his behalf. The Complaint notes that FEC reports reflect \$37,000 in total contributions by Mr. Tisch subject to the 1992 "annual" limit of the Federal Election Campaign Act ("Act"). Three contributions of \$1,000 were made in 1991, but by FEC rules must count towards the 1992 limit of \$25,000. In response to the Complaint, we wish to submit the following information for the Commission's consideration.

The issue of Mr. Tisch's compliance with the annual limit is triggered by one particular donation. That contribution was to the Republican National Committee ("RNC") in the amount of \$20,000 in September of 1992.

Well before the Complaint was filed, Mr. Tisch requested a review of his political donations by outside counsel. In the Fall of 1993, counsel conducted such a review.

Counsel verified that Mr. Tisch's donation to the RNC had not been unambiguously designated for a "non-federal" account of the Republican National Committee. Accordingly, counsel requested in writing on December 10, 1993, that the RNC transfer \$20,000 in its federal account to a "non-federal" account. (Copy of letter to Michael Hess enclosed). By letter of December 15, 1993, counsel

RECEIVED
FEDERAL ELECTION
COMMISSION
COUNSEL
94 FEB 16 PM 2:33

14043593694

WILEY, REIN & FIELDING

**Lawrence M. Noble, Esq.
February 14, 1994
Page 2**

**for the RNC confirmed that such a transfer occurred on that date.
(Copy of letter from Michael Hess to Jan W. Baran enclosed).**

Mr. Tisch has taken conscientious steps to ensure compliance with the Act, including efforts predating and unrelated to this complaint. As a result of the RNC transfer, the total amount of 1992 contributions attributable to Mr. Tisch is \$17,000, well below the limit.

We respectfully suggest that, under these circumstances, the FEC should not find any reason to believe that Mr. Tisch violated the Act.

Sincerely,


Jan Witold Baran

Encls.

14043593695

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3873

NAME OF COUNSEL: Jan Witold Baran

ADDRESS: Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

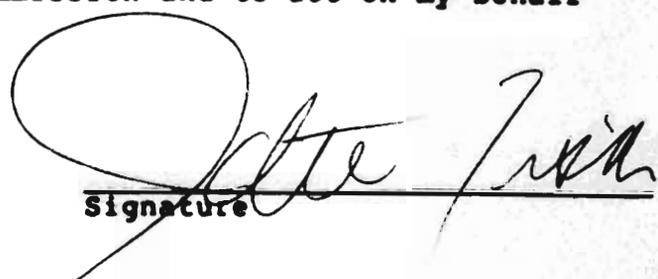
TELEPHONE: (202) 429-7330

94 FEB 16 PM 2:33

RECEIVED
FEDERAL RESERVE 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.

Date _____


Signature _____

RESPONDENT'S NAME: Jonathan M. Tisch

ADDRESS: Loews Corporation
667 Madison Ave.
New York, NY 10021

TELEPHONE: HOME(_____) _____

BUSINESS(_____) _____

4043593696



**Republican
National
Committee**

**Michael A. Hess
Chief Counsel**

RECEIVED
FEDERAL ELECTION COMMISSION
94 FEB 16 PM 2:33

December 15, 1993

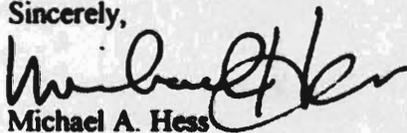
Jan W. Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

Dear Jan:

I am in receipt of your letter of December 10 regarding a contribution to the RNC by Mr. Jonathan Tisch. We are willing to voluntarily transfer \$20,000 from the RNC's federal account to our non-federal Republican National State Elections Committee account. This transfer will take place today, and be reflected on our FEC report merely as a transfer between the two accounts, with no further explanation on the report.

If you have any further questions, please do not hesitate to contact me.

Sincerely,


Michael A. Hess

14043593697

received
12-20-93

WILEY, REIN & FIELDING

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

December 10, 1993

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Michael Hess, Esq.
Chief Counsel
Republican National Committee
310 First St., S.E.
Washington, D.C. 20003

Re: Jonathan Tisch

Dear Mr. Hess:

As you know, this office represents Mr. Jonathan Tisch, a regular financial supporter of the Republican National Committee. Over the past month you have been very helpful in verifying, at my request, certain facts regarding Mr. Tisch's donations to the RNC, particularly with respect to calendar year 1992. I thank you for your assistance in this regard.

As a result of this review and verification, we have been able to confirm that a donation by Mr. Tisch of \$20,000 on or about September 11, 1992, was received and deposited by the RNC in a "federal" account on or about September 18. It also is clear from our review that that donation should have been more unambiguously designated for a "non-federal" account. Accordingly, on behalf of Mr. Tisch, I respectfully request that the RNC transfer \$20,000, which would represent that contribution from Mr. Tisch, from its federal account to an appropriate non-federal account. Such remedial action by the RNC would be greatly appreciated by Mr. Tisch and would ensure compliance with Federal campaign financing laws.

I would welcome your written confirmation that the RNC is willing to take this action.

Sincerely,



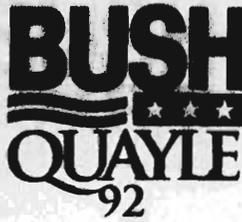
Jan Witold Baran

cc: Mr. Jonathan Tisch

94 FEB 16 PM 2:33

FEDERAL RECEIVED
ELECTION COMMISSION

8
9
3
6
9
5
9
4
3
4
0
4



FEDERAL ELECTION COMMISSION RECEIVED

94 MAR -3 PM 12:26

Stan Huckaby
Treasurer

February 23, 1994

Ms. Mary Taksar
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: MUR 3873

Dear Ms. Taksar:

The Bush-Quayle '92 Primary Committee, Inc., ("the Primary Committee") received on February 17, 1994 your letter dated February 15, 1994, regarding this MUR.

As indicated in Exhibit 2 accompanying the MUR, Mr. Jonathan M. Tisch made a \$ 1,000 contribution to the Primary Committee on November 14, 1991. He made a second contribution of \$ 1,000 on April 1, 1992, which was refunded on May 29, 1992. Therefore, the Primary Committee is not in violation of any FEC regulation with respect to Mr. Tisch's contributions.

The documentation necessary to support the activity referenced above has already been provided to, and verified by, the Commission's Audit Division. As a result, I request that the Commission determine that no action should be taken against the Committee with respect to MUR 3873.

Sincerely:


J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.

4043593679

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
) Enforcement Priority
)

GENERAL COUNSEL'S MONTHLY REPORT

SENSITIVE

I. INTRODUCTION

This report is the second Enforcement Priority System Monthly Report. The purpose of this September Monthly 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 and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. 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 44 cases which do not warrant further pursuit

14043593700

relative to the other pending cases.¹ A short 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 1-44. For the Commission's convenience, the narratives for the externally-generated matters are immediately followed by the complaint and response(s) and the narrative for the internally-generated matter is 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 2 cases that have remained inactive and assigned to the Central Enforcement Docket for one year and which it believes do not warrant further investment of significant Commission resources.² Since the recommendation not to pursue the identified cases is

1. These matters are: PM 299; MUR 3856; MUR 3859; MUR 3860; MUR 3861; MUR 3863; MUR 3864; MUR 3865; MUR 3868; MUR 3869; MUR 3870; MUR 3871; MUR 3872; MUR 3873; MUR 3874; MUR 3875; MUR 3877; MUR 3878; MUR 3880; MUR 3881; MUR 3882; MUR 3883; MUR 3884; MUR 3885; MUR 3887; MUR 3888; MUR 3889; MUR 3897; MUR 3900; MUR 3901; MUR 3906; MUR 3909; MUR 3910; MUR 3913; MUR 3914; MUR 3915; MUR 3916; MUR 4029; MUR 4030; MUR 4034; MUR 4035; MUR 4038; MUR 4039; and MUR 4040.

2. These matters are RAD 93L-66 and RAD 93L-69.

4043593701

based on staleness, this Office has not prepared separate narratives for these cases. However, the referrals for these internally-generated matters are attached. See Attachments 45-46.

4043593702

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective November 14, 1994. By closing the cases effective November 14, 1994, CED and the Legal Review Team will respectively have the additional time necessary for preparing the closing letters and the case files for the public record for this fairly large number of cases.

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file effective November 14, 1994 in RAD 93L-66 and RAD 93L-69.

B. Decline to open a MUR, close the file effective November 14, 1994, and approve the appropriate letter in PM 299.

C. Take no action, close the file effective November 14, 1994, and approve the appropriate letter in the following matters:

- 1) MUR 3856
- 2) MUR 3859
- 3) MUR 3860
- 4) MUR 3861
- 5) MUR 3863
- 6) MUR 3864
- 7) MUR 3865
- 8) MUR 3868
- 9) MUR 3869
- 10) MUR 3870
- 11) MUR 3871
- 12) MUR 3872
- 13) MUR 3873
- 14) MUR 3874
- 15) MUR 3875
- 16) MUR 3877
- 17) MUR 3878
- 18) MUR 3880
- 19) MUR 3881
- 20) MUR 3882
- 21) MUR 3883
- 22) MUR 3884
- 23) MUR 3885
- 24) MUR 3887
- 25) MUR 3888
- 26) MUR 3889
- 27) MUR 3897
- 28) MUR 3900
- 29) MUR 3901
- 30) MUR 3906
- 31) MUR 3909
- 32) MUR 3910
- 33) MUR 3913
- 34) MUR 3914
- 35) MUR 3915

4043593703

- 36) MUR 3916
- 37) MUR 4029
- 38) MUR 4030
- 39) MUR 4034
- 40) MUR 4035
- 41) MUR 4038
- 42) MUR 4039
- 43) MUR 4040

10'26'94

 Date

Lawrence M. Noble

 Lawrence M. Noble
 General Counsel

Attachments

4043593704

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Jonathan M. Tisch.

)
)
)

MUR 3873

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on November 2, 1994, the Commission decided by a vote of 6-0 to take no action, close the file in MUR 3873 effective November 14, 1994, and approve the appropriate letter, as recommended in the General Counsel's Report dated October 26, 1994.

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

Attest:

11-3-94
Date

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

Received in the Secretariat: Thurs., Oct. 27, 1994 3:16 p.m.
Circulated to the Commission: Fri., Oct. 28, 1994 2:00 p.m.
Deadline for vote: Wed., Nov. 02, 1994 4:00 p.m.

bjr

14043593705



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV 21 1994

Ellen S. Miller, Executive Director
Center for Responsive Politics
1320 19th Street, N.W.
Washington, D.C. 20036

RE: MUR 3873

Dear Ms. Miller:

On January 21, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the respondents. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 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

Attachment
Narrative

4043593706

NUR 3873
JONATHAN M. TISCH

The Center for Responsive Politics filed a complaint alleging that Jonathan Tisch exceeded his \$25,000 annual contribution limit for 1992 by \$12,000 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$37,000. The contributions identified in the complaint raised the issue of whether a recipient committee, the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

In response to the complaint, Mr. Tisch states that prior to the filing of the complaint, he recognized that his \$20,000 contribution to the Republican National Committee ("RNC") had not been clearly designated to the RNC's non-federal account. He states that he therefore requested that his \$20,000 contribution be transferred to RNC's non-federal account and the RNC confirmed by letter that the transfer had taken place. As a result of these actions, Mr. Tisch indicates that his 1992 contributions total \$17,000.

The Bush-Quayle '92 Primary Committee responds that Mr. Tisch made two \$1,000 contributions to the Committee and that one of the contributions was refunded.

This matter involves less significant issues relative to other matters pending before the Commission.

4043593707



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

NOV 21 1994

Jan Witold Baran, Esq.
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

RE: MUR 3873
Jonathan M. Tisch

Dear Mr. Baran:

On January 28, 1994, the Federal Election Commission notified your client, Jonathan M. Tisch, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your client. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 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 Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

4043593708

MUR 3873
JONATHAN M. TISCH

The Center for Responsive Politics filed a complaint alleging that Jonathan Tisch exceeded his \$25,000 annual contribution limit for 1992 by \$12,000 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$37,000. The contributions identified in the complaint raised the issue of whether a recipient committee, the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

In response to the complaint, Mr. Tisch states that prior to the filing of the complaint, he recognized that his \$20,000 contribution to the Republican National Committee ("RNC") had not been clearly designated to the RNC's non-federal account. He states that he therefore requested that his \$20,000 contribution be transferred to RNC's non-federal account and the RNC confirmed by letter that the transfer had taken place. As a result of these actions, Mr. Tisch indicates that his 1992 contributions total \$17,000.

The Bush-Quayle '92 Primary Committee responds that Mr. Tisch made two \$1,000 contributions to the Committee and that one of the contributions was refunded.

This matter involves less significant issues relative to other matters pending before the Commission.

4043593709



FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20461

NOV 21 1994

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
228 S. Washington Street, Suite 200
Alexandria, VA 22314

RE: MUR 3873

Dear Mr. Huckaby:

On February 15, 1994, the Federal Election Commission notified Bush-Quayle '92 Primary Committee, Inc. ("Committee") and you, as treasurer, of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on November 14, 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 Alva E. Smith at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

4043593710

MUR 3873
JONATHAN H. TISCH

The Center for Responsive Politics filed a complaint alleging that Jonathan Tisch exceeded his \$25,000 annual contribution limit for 1992 by \$12,000 because the contributions which he made during 1991 and 1992 and which were attributable to 1992 totaled \$37,000. The contributions identified in the complaint raised the issue of whether a recipient committee, the Bush-Quayle '92 Primary Committee, Inc., accepted contributions which exceeded the \$1,000 limit.

In response to the complaint, Mr. Tisch states that prior to the filing of the complaint, he recognized that his \$20,000 contribution to the Republican National Committee ("RNC") had not been clearly designated to the RNC's non-federal account. He states that he therefore requested that his \$20,000 contribution be transferred to RNC's non-federal account and the RNC confirmed by letter that the transfer had taken place. As a result of these actions, Mr. Tisch indicates that his 1992 contributions total \$17,000.

The Bush-Quayle '92 Primary Committee responds that Mr. Tisch made two \$1,000 contributions to the Committee and that one of the contributions was refunded.

This matter involves less significant issues relative to other matters pending before the Commission.

4043593711



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3873

DATE FILMED 12-14-91 CAMERA NO. 2

CAMERAMAN JMN

4043593712