



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3886

DATE FILMED 9-28-95 CAMERA NO. 1

CAMERAMAN JMH

95043691645

RECEIVED
FEDERAL ELECTION COMMISSION
PUBLIC DISCLOSURE DIVISION

93 OCT 25 PM 4:08

HAND DELIVERED

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 25, 1993

Pre-MUR 290

RECEIVED
FEDERAL ELECTION COMMISSION
93 OCT 27 AM 9:36

Mr. Kent C. Cooper
Assistant Staff Director
Public Disclosure Division
Federal Election Commission
999 E Street, NW Room 129
Washington, D.C. 20463

Hand delivered

Dear Mr. Cooper:

I recently requested a copy of my records from the 1993-1994 election cycle. Upon examining those records I noticed that several contributions my wife and I made jointly were incorrectly attributed in total to me.

I have corresponded with each campaign committee in order to rectify the situation, and have enclosed those letters for your records.

Thank you for your attention to this matter.

Sincerely,


Herbert F. Collins

95043691646

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

The Honorable Phil Gramm
National Republican
Senatorial Committee
425 Second Street, NE
Washington, D.C. 20002

Dear Senator Gramm:

I am writing in regard to a contribution that was made to the President's Dinner on or about 4/27/92 for the amount of \$9,000.

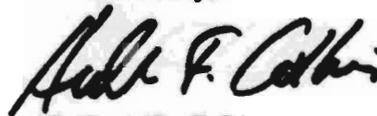
I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$4,500
Sheila Collins - \$4,500

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,



Herbert F. Collins

cc: Congressman Bill Paxon
National Republican Congressional Committee

95043691647

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

The Honorable Phil Gramm
National Republican
Senatorial Committee
425 Second Street, NE
Washington, D.C. 20002

Dear Senator Gramm:

On April 27, 1992, I jointly made a contribution with my husband, Herbert F. Collins, to the President's Dinner for the amount of \$9,000.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$4,500
Sheila Collins - \$4,500

Thank you for your attention to this matter.

Sincerely,



Sheila Collins

cc: Congressman Bill Paxon
National Republican Congressional Committee

95043691648

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

The Honorable Phil Gramm
National Republican
Senatorial Committee
425 Second Street, NE
Washington, D.C. 20002

Dear Senator Gramm:

I am writing in regard to a contribution that was made to the National Republican Senatorial Committee on or about 5/7/93 for the amount of \$7,500.

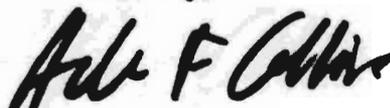
I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$3,750
Sheila Collins - \$3,750

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,


Herbert F. Collins

95043691649

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

The Honorable Phil Gramm
National Republican
Senatorial Committee
425 Second Street, NE
Washington, D.C. 20002

Dear Senator Gramm:

May 7, 1993, I jointly made a contribution with my husband, Herbert F. Collins, to the National Republican Senatorial Committee for the amount of \$7,500.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$3,750
Sheila Collins - \$3,750

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

95043691650

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

The Honorable Bill Paxon
National Republican
Congressional Committee
320 First Street, SE
Washington, D.C. 20003

Dear Congressman Paxon:

I am writing in regard to a contribution that was made to the President's Dinner on or about 4/27/92 for the amount of \$9,000.

I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$4,500
Sheila Collins - \$4,500

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,



Herbert F. Collins

cc: Senator Phil Gramm
National Republican Senatorial Committee

95043691651

EDENBORO ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

The Honorable Bill Paxon
National Republican
Congressional Committee
320 First Street, SE
Washington, D.C. 20003

Dear Congressman Paxon:

On April 27, 1992, I jointly made a contribution with my husband, Herbert F. Collins, to the President's Dinner for the amount of \$9,000.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$4,500
Sheila Collins - \$4,500

Thank you for your attention to this matter.

Sincerely,



Sheila Collins

cc: Senator Phil Gramm
National Republican Senatorial Committee

95043691652

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Mr. Scott Reed
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

Dear Scott:

I am writing in regard to a contribution that was made to the RNC on or about 10/16/92 for the amount of \$15,000.

I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$7,500
Sheila Collins - \$7,500

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,


Herbert F. Collins

95043691653

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Mr. Scott Reed
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

Dear Scott:

On October 16, 1992, I jointly made a contribution with my husband, Herbert F. Collins, to the RNC for the amount of \$15,000.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$7,500
Sheila Collins - \$7,500

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

95043691654

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Mr. Les Brorsen
Administrative Assistant
Senator Don Nickles
SH-713 Hart Senate Office Building
Washington, D.C. 20510

Dear Les:

I am writing in regard to contributions that were made to Nickles for Senate on or about 2/5/92 for the amount of \$1,000, and 8/4/92 for the amount of \$1,000; I would appreciate your forwarding this to the appropriate individual.

I have been informed that when the contributions were reported to the Federal Election Commission, they were attributed solely to Herbert F. Collins. The checks written for those contributions were drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - 2/5/92; \$1,000
Sheila Collins - 8/4/92; \$1,000

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,



Herbert F. Collins

95043691655

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Mr. Les Brorsen
Administrative Assistant
Senator Don Nickles
SH-713 Hart Senate Office Building
Washington, D.C. 20510

Dear Les:

On February 5, 1992, and August 4, 1992, I jointly made contributions with my husband, Herbert F. Collins, to Nickles for Senate.

It has come to my attention that these contributions were attributed in total to my husband. They should have been attributed as follows:

Herbert F. Collins - 2/5/92; \$1,000
Sheila Collins - 8/4/92; \$1,000

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

95043691656

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Citizens for Olympia Snowe
Post Office Box 1994
Auburn, Maine 04210

Dear Sir/Madam:

I am writing in regard to a contribution that was made to Citizens for Olympia Snowe on or about 6/15/92 for the amount of \$750.

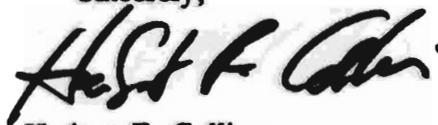
I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$375
Sheila Collins - \$375

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,



Herbert F. Collins

95043691657

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Citizens for Olympia Snowe
Post Office Box 1994
Auburn, Maine: 04210

Dear Sir/Madam:

On June 15, 1992, I jointly made a contribution with my husband, Herbert F. Collins, to Citizens for Olympia Snowe for the amount of \$750.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$375
Sheila Collins - \$375

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

95043691658

EDDINGBOR ROAD
GLOUCESTER, MASSACHUSETTS 01936

October 19, 1993

Friends of Newt Gingrich
1085 Holcomb Bridge Road
Suite 190
Roswell, Georgia 30076

Dear Sir/Madam:

I am writing in regard to contributions that were made to Friends of Newt Gingrich on or about 7/20/92 for the amount of \$1,000, and 6/30/93 for the amount of \$500.

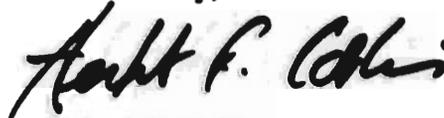
I have been informed that when the contributions were reported to the Federal Election Commission, they were attributed solely to Herbert F. Collins. The checks written for those contributions were drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - 7/20/92, \$500; 6/30/93, \$250
Sheila Collins - 7/20/92, \$500; 6/30/93, \$250

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,



Herbert F. Collins

95043691659

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

9 5 0 4 3 6 9 1 6 6 0
Friends of Newt Gingrich
1085 Holcomb Bridge Road
Suite 190
Roswell, Georgia 30076

Dear Sir/Madam:

On July 20, 1992, and June 30, 1993, I jointly made contributions with my husband, Herbert F. Collins, to Friends of Newt Gingrich.

It has come to my attention that these contributions were attributed in total to my husband. They should have been attributed as follows:

Herbert F. Collins - 7/20/92, \$500; 6/30/93, \$250
Sheila Collins - 7/20/92, \$500; 6/30/93, \$250

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Ms. Martha Austin
Administrative Assistant
Senator Judd Gregg
SR-393 Russell Senate Office Building
Washington, D.C. 20510

Dear Martha:

I am writing in regard to a contribution that was made to Senator Gregg on or about 10/19/92 for the amount of \$1,000; I would appreciate your forwarding this to the appropriate individual.

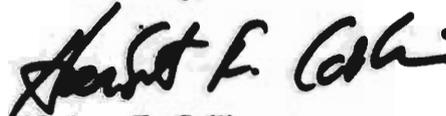
I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$500
Sheila Collins - \$500

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,


Herbert F. Collins

95043691661

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Ms. Martha Austin
Administrative Assistant
Senator Judd Gregg
SR-393 Russell Senate Office Building
Washington, D.C. 20510

Dear Martha:

On October 19, 1992, I jointly made a contribution with my husband, Herbert F. Collins, to Senator Gregg's campaign for the amount of \$1,000.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$500
Sheila Collins - \$500

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

95043691662

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Ms. JoAnne Coe
Campaign America
900 Second Street, N.E.
Suite 114
Washington, D.C. 20002

Dear JoAnne:

I am writing in regard to contributions that were made to Campaign America on or about 3/23/92 for the amount of \$1,000, 10/19/92 for the amount of \$1,000, 2/19/93 for the amount of \$5,000, 5/7/93 for the amount of \$2,000, and 5/8/93 for the amount of \$1,000.

I have been informed that when these contributions were reported to the Federal Election Commission, they were attributed solely to Herbert F. Collins. The checks written for those contributions were drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - 3/23/92, \$500; 10/19/92, \$500; 2/19/93, \$2,500; 5/7/93,
\$1,000; 5/8/93, \$500

Sheila Collins - 3/23/92, \$500; 10/19/92, \$500; 2/19/93, \$2,500; 5/7/93, \$1,000;
5/8/93, \$500

I have attached an explanatory note from Sheila Collins.

JoAnne, I appreciate your attention to this matter.

Sincerely,



Herbert F. Collins

95043691663

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Ms. JoAnne Coe
Campaign America
900 Second Street, N.E.
Suite 114
Washington, D.C. 20002

Dear JoAnne:

On March 23, 1992, October 19, 1992, February 19, 1993, May 7, 1993, and May 8, 1993, I jointly made contributions with my husband, Herbert F. Collins, to Campaign America.

It has come to my attention that these contributions were attributed in total to my husband. They should have been attributed as follows:

Herbert F. Collins - 3/23/92, \$500; 10/19/92, \$500; 2/19/93, \$2,500, 5/7/93,
\$1,000; 5/8/93, \$500

Sheila Collins - 3/23/92, \$500; 10/19/92, \$500; 2/19/93, \$2,500; 5/7/93, \$1,000;
5/8/93, \$500

Many thanks for your assistance!

Sincerely,

Sheila Collins
Sheila Collins

95043691664

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Gallo for Congress
101 Gibraltar Drive
Suite 2E-1
Morris Plains, New Jersey 07590

Dear Sir/Madam:

I am writing in regard to a contribution that was made to Gallo for Congress on or about 5/3/91 for the amount of \$500.

I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$250
Sheila Collins - \$250

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,



Herbert F. Collins

95043691665

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

9 5 0 4 3 6 9 1 6 6 6
Gallo for Congress
101 Gibraltar Drive
Suite 2E-1
Morris Plains, New Jersey 07590

Dear Sir/Madam:

On May 3, 1991, I jointly made a contribution with my husband, Herbert F. Collins, to Gallo for Congress for the amount of \$500.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$250
Sheila Collins - \$250

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Mr. John Savercool
Chief of Staff
Senator Kay Bailey Hutchison
SH-703 Hart Senate Office Building
Washington, D.C. 20510

Dear John:

I am writing in regard to a contribution that was made to Kay Bailey Hutchison for Senate Committee on or about 5/8/93 for the amount of \$1,000; I would appreciate your forwarding this to the appropriate person.

I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$500
Sheila Collins - \$500

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,



Herbert F. Collins

95043691667

EDGEWOOD ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Mr. John Savercool
Chief of Staff
Senator Kay Bailey Hutchison
SH-703 Hart Senate Office Building
Washington, D.C. 20510

Dear John:

On May 8, 1993, I jointly made a contribution with my husband, Herbert F. Collins, to Kay Bailey Hutchison for Senate Committee for the amount of \$1,000.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$500
Sheila Collins - \$500

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

95043691668

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Mr. Rick Evans
Administrative Assistant
Senator Dave Durenberger
SR-154 Russell Senate Office Building
Washington, D.C. 20510

Dear Rick:

I am writing in regard to contributions that were made to Durenberger '94 Volunteer Committee on or about 6/17/93, one for the amount of \$1,000, and another for the amount of \$750; I would appreciate your forwarding this to the appropriate person.

I have been informed that when the contributions were reported to the Federal Election Commission, they were attributed solely to Herbert F. Collins. The checks written for those contributions were drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$500; \$375
Sheila Collins - \$500; \$375

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,


Herbert F. Collins

95043691669

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Mr. Rick Evans
Administrative Assistant
Senator Dave Durenberger
SR-154 Russell Senate Office Building
Washington, D.C. 20510

Dear Rick:

June 17, 1993, I jointly made contributions with my husband, Herbert F. Collins, to the Durenberger '94 Volunteer Committee.

It has come to my attention that these contributions were attributed in total to my husband. They should have been attributed as follows:

Herbert F. Collins - \$500; \$375
Sheila Collins - \$500; \$375

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

95043691670

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Peter Blute for Congress Committee
512 West Main Street
Shrewsbury, Massachusetts 01545

Dear Sir/Madam:

I am writing in regard to a contribution that was made to Peter Blute for Congress Committee on or about 3/3/93 for the amount of \$1,000.

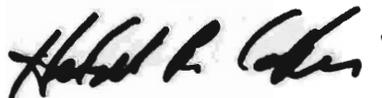
I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$500
Sheila Collins - \$500

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,



Herbert F. Collins

95043691671

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Peter Blute for Congress
512 West Main Street
Shrewsbury, Massachusetts 01545

Dear Sir/Madam:

March 3, 1993, I jointly made a contribution with my husband, Herbert F. Collins, to Peter Blute for Congress for the amount of \$1,000.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$500
Sheila Collins - \$500

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

95043691672

EDGEMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Citizens for Peter Torkildsen
80 Prospect Street
Peabody, Massachusetts 01960

Dear Sir/Madam:

I am writing in regard to a contribution that was made to Citizens for Peter Torkildsen on or about 1/25/93 for the amount of \$1,000.

I have been informed that when the contribution was reported to the Federal Election Commission, it was attributed solely to Herbert F. Collins. The check written for that contribution was drawn on a joint checking account for Herbert and Sheila Collins, and should have been attributed as follows:

Herbert F. Collins - \$500
Sheila Collins - \$500

Attached is an explanatory note from Sheila Collins.

I appreciate your attention to this matter.

Sincerely,

Herb F. Collins
Herbert F. Collins

95043691673

EDENMOOR ROAD
GLOUCESTER, MASSACHUSETTS 01930

October 19, 1993

Citizens for Peter Torkildsen
80 Prospect Street
Peabody, Massachusetts 01960

Dear Sir/Madam:

On January 25, 1993, I jointly made a contribution with my husband, Herbert F. Collins, to Citizens for Peter Torkildsen for the amount of \$1,000.

It has come to my attention that this contribution was attributed in total to my husband. It should have been attributed as follows:

Herbert F. Collins - \$500
Sheila Collins - \$500

Thank you for your attention to this matter.

Sincerely,

Sheila Collins
Sheila Collins

95043691674



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

NOVEMBER 5, 1993

Herbert F. Collins
Edgemoor Road
Gloucester, MA 01930

RE: Pre-MUR 290

Dear Mr. Collins:

This is to acknowledge receipt of your letter dated October 25, 1993, pertaining to the contributions made by you during recent election cycles. You will be notified as soon as the Federal Election Commission takes action on your submission.

If you have any questions, please call me at (202) 219-3690. For your information, we have attached a brief description of the Commission's procedures for handling matters such as this.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

95043691675

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

94 JAN 21 PM 4:31

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE

CENTER FOR RESPONSIVE POLITICS

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

v.

Complainant,

Herbert F. Collins

Respondent,

COMPLAINT

MUR 3886

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.

95043691676

APPLICABLE STATUTES AND REGULATIONS

4. The FBCA 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 Herbert F. Collins made contributions subject to FBCA 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 Herbert F. Collins made contributions attributed to the 1992 calendar year in the amount of \$42,000. These contributions exceeded by \$17,000 the \$25,000 contribution limit imposed by the FBCA 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

95043691677

Summary of FEC Data

Recipient	Amount	Date	FEC Microfilm Location
Bush, George	\$2,000	02/04/92	92FEC/739/3702
Bush, George	\$2,000	10/29/91	92FEC/731/0203
Bush, George	\$-1,000	03/02/92	92FEC/744/2349
Bush, George	\$-1,000	12/22/91	92FEC/731/1059
Butler, Henry N	\$500	05/28/92	92HSE/458/0435
Daly, Daniel W	\$250	05/13/92	92HSE/456/0899
Dole, Bob	\$1,000	03/23/92	91FEC/695/5427
Dole, Bob	\$1,000	10/19/92	92SEN/029/2127
Gallo, Dean A	\$500	05/03/91	91HSE/431/3088
Gingrich, Newt	\$1,000	07/20/92	92HSE/479/4091
Gregg, Judd	\$1,000	10/19/92	92SEN/028/2823
Massachusetts Republican State Cmte	\$2,000	08/04/92	93FEC/834/2361
Massachusetts Republican State Cmte	\$1,000	08/05/92	92FEC/764/2263
Massachusetts Republican State Cmte	\$1,000	08/04/92	93FEC/834/2361
Massachusetts Republican State Cmte	\$500	08/05/92	91FEC/690/4632
Massachusetts Republican State Cmte	\$500	07/20/92	93FEC/834/2361
Mograhn, Raymond J	\$1,000	04/27/92	92HSE/457/4858
Nickles, Don	\$1,000	02/05/92	92SEN/018/2157
Nickles, Don	\$1,000	08/04/92	92SEN/018/2157
Packwood, Bob	\$1,000	07/15/91	92SEN/004/0355
Packwood, Bob	\$1,000	07/15/91	92SEN/004/0355
President's Dinner 1992	\$9,000	04/27/92	92FEC/766/4178
Republican National Cmte	\$15,000	10/16/92	92FEC/807/2214
Snowe, Olympia J	\$750	06/15/92	92HSE/461/0190

95043691679

Total Contributions Attributed to 1992: \$42,000

Herbert P. Collins
Exhibit 2

95043691680

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Full Name of Committee: BUTLER FOR CONGRESS

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Keylene H. Green P.O. Box 419 Oakton VA 22124	Info requested Info requested	05/26/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Herbert F. Collins 315 Congress St. Boston MA 02210	Boston Capital, Inc. information Requested	05/28/92	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
T.A. Adams Jr. 6551 Loisdale Court Springfield VA 22150	Unified Industries Pres.	05/28/92	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Robert L. Pitton II 6300 Pohick Station Dr. Fairfax Station VA 22039	Self Developer	05/28/92 06/03/92	50.00 250.00

Receipt for: Primary Year-to-Date Total: \$ 300.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Arthur E. Rives 2905 N. Archer Court Woodbridge VA	Retired	05/28/92	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Lee Goodwin 11817 Winterset Ter. Potomac MD 20854	Information Requested Information Requested	05/29/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

SUBTOTAL of Receipts This Page 3300.00

TOTAL This Period

SCHEDULE A-P

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20543

ITEMIZED RECEIPTS

This schedule is required for each category of the detailed summary page	PAGE	OF Total pages
	1068	1290
LINE NUMBER 178		

NAME OF CONTRIBUTOR (in Full)				DATE (MONTH, DAY, YEAR)		AMOUNT (of EACH RECEIPT THIS PERIOD)
DEB-STAYLE '92 PRIMARY COMMITTEE						
<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		
Woods, Mr. Corey 21 Carriage Square Waco, TX 76708	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,000.00		11/08/91	\$1,000.00		
Woods, Mr. Barbara C. 1505 Princeton Midland, TX 79701	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,000.00		11/08/91	\$1,000.00		
Sims, Mr. Ross Jr. 2403 Arroyo Waco, TX 76710	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$500.00		11/08/91	\$500.00		
Greene, Mr. Donald J. 22 Cherry Street Douglasen, NY 11368	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,000.00		12/04/91	\$1,000.00		
Gerschel, Mr. Patrick 120 Fifth Avenue New York, NY 10019	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,000.00		10/31/91	\$1,000.00		
Rever, Mr. Randall E. 437 Skywood Houston, TX 77057	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,300.00		10/31/91	\$1,000.00		
Walters, Mr. Isabel B. 230 Westcott Suite 20A Houston, TX 77007	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,300.00		11/28/91	\$1,000.00		152
Walters, Mr. Herbert F. 1 Applewood Road Wester, MA 01930	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO DATE \$1,300.00		12/22/91	\$1,000.00		152
SUBTOTAL OF RECEIPTS THIS PAGE (option 1)						\$5,000.00
TOTAL THIS PERIOD (last page this line number only)						

95043691682



SCHEDULE A-P

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

ITEMIZED RECEIPTS

Use separate schedule for each category of the detailed summary page	PAGE 4	OF THIS SCHEDULE 12
	LINE NUMBER 175	

2950436902

NAME OF CONTRIBUTOR (in Full)				
DEMOCRATIC '92 COMPLIANCE COMMITTEE				
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			DATE (MONTH, DAY, YEAR)	AMOUNT OF CASH RECEIPT THIS PERIOD
NAME ADDRESS CITY STATE ZIP CODE Collins, Mr. Robert F. 3 Edgemere Rd. Gloucester, MA 02210	NAME OF EMPLOYER Info Requested	RECEIPT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	02/04/92	\$2,000.00 ✓
NAME ADDRESS CITY STATE ZIP CODE Smith, Mrs. Muriel R. 1350 E. Newport Center Drive Suite 201 Deerfield Beach, FL 33443	NAME OF EMPLOYER Info Requested	RECEIPT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	2/23/92	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Getzer, Mr. Michael L. P.O. Box 4457 Greenville, MS 38701	NAME OF EMPLOYER Info Requested	RECEIPT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	02/23/92	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Rang, Mr. Harry V. 954 Hillside Terrace Pasadena, CA 91105	NAME OF EMPLOYER Info Requested	RECEIPT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	02/25/92	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Boggs, Mr. Mark 1001 Park Ave. New York, NY 10020	NAME OF EMPLOYER Info Requested	RECEIPT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	02/25/92	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Rang, Mrs. Grace E. 1902 E. Alexandria Ave. Los Angeles, CA 90027	NAME OF EMPLOYER Info Requested	RECEIPT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	02/25/92	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Jones, Mr. David A. 500 W. Main St. Dubuque, IA 52002	NAME OF EMPLOYER Info Requested	RECEIPT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	02/04/92	\$1,000.00
NAME ADDRESS CITY STATE ZIP CODE Rang, Mrs. Grace E. 400 North Flagler Drive Box 2002 West Palm Beach, FL 33401	NAME OF EMPLOYER Info Requested	RECEIPT FOR <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	02/23/92	\$1,000.00
SUBTOTAL OF RECEIPTS THIS PAGE (last page)				\$9,000.00
TOTAL THIS PERIOD (last page this line number only)				

*-Retribution or Resignation Requested

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page
 PAGE 09
 FOR LINE NUMBER 11A

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

NAME OF CONTRIBUTOR (in Full)

MCGRATH FOR SENATE COMMITTEE



A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (the Period)
HERBERT F COLLINS 46 BOSTON CAPITAL PARTNERS 313 COURAGEOUS STREET BOSTON, MASS. 02110-1061	BOSTON CAPITAL PARTNERS Occupation Gov't Relations Aggregate Year-to-Date \$ 1,000	4/27/92	1,000
WILLIAM J GREEN 4875 LOUGHBORO ROAD, N.W. WASHINGTON, DC 20016	MC GRATH FOR SENATE Occupation V.P. Gov't. Relations Aggregate Year-to-Date \$ 1,000	4/27/92	1,000
JANE P. MANNING 46 BOSTON CAPITAL PARTNERS 313 COURAGEOUS STREET BOSTON, MASS. 02110-1061	BOSTON CAPITAL PARTNERS Occupation Gov't. Relations Aggregate Year-to-Date \$ 1,000	4/27/92	1,000
HERBERT J. RICHMAN 5 KINGSLEY TERRACE MORAVILLE, N.Y. 07741	Republic National Assoc. of Lawyers Occupation FEDERAL V.P. Aggregate Year-to-Date \$ 1,000	4/27/92	1,000
JANE L. VOGELSTEIN 1107 FIFTH AVE NEW YORK, N.Y.	Liz Robbins Agency Occupation Gov't. Relations Aggregate Year-to-Date \$ 1,000	4/27/92	1,000
WILLIAM MORRIS 1737 N STREET N.W. WASHINGTON, DC 20006	ROBERT ANDREWS Occupation ATTORNEY Aggregate Year-to-Date \$ 500	4/27/92	500
RODMAN L. ECKHARTER 50 ROCKEFELLER PLAZA NEW YORK, N.Y. 10114	ECKHARTER Corporation Occupation DIVERSA Aggregate Year-to-Date \$ 500	4/27/92	500

SUBTOTAL of Receipts (This Page (amount)) 6,000
 TOTAL (The Period 1992 page (the line number only))

SCHEDULE A

ITEMIZED RECEIPTS

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: The Dan Daly for U.S. Congress Committee

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Richard F. Burnes Jr. 17 Pinckney Street Boston MA 02114	Charles River Ventures Venture Capital	06/08/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Herbert F. Collins 313 Congress Street Boston MA 02210	Boston Capital Partner Executive	05/17/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Christopher M. Condon 352 Hammond Street Chestnut Hill MA 02167	Boston Safe Deposit & President	05/28/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
James A. Daley 138 St. James Avenue Boston MA 02116	Copley Plaza Hotel Owner	05/13/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Peter B. Dooley 295 Stuyvesant Drive San Anselmo CA 94960	Paget Industries President	06/01/92	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
William P. Egan 9 Philips Pond Natick MA 01760	Burr, Egan, Deleage & Venture Capital	06/08/92	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

SUBTOTAL of Receipts This Page 2500.00

TOTAL This Period 2500.00

SCHEDULE A **ITEMIZED RECEIPTS**
 NAME OF COMMITTEE - DOLE FOR SENATE 92
 PERIOD RUN 01/01/92 THRU 03/31/92

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NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	RECEIPT AMOUNT
MR. JACK C MITCHELL 22 PINECREST WELLINGTON KS 67152	RETIRED FOOTBALL COACH/NEWS PUBLISHER	03/20/92	500.00

(X)PRI ()GEN ()OTHER: AGGREGATE YTD 500.00

CHARLES L BARTLETT 1529 10TH ST NW WASHINGTON DC 20036	SELF EMPL WRITER	03/23/92	1,000.00
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(X)PRI ()GEN ()OTHER: AGGREGATE YTD 1,000.00

MR HERBERT COLLINS 315 CONGRESS ST BOSTON MA 02110	CHAIRMAN OF THE BO BOSTON CAPITAL PARTNERS INC	03/23/92	1,000.00
----------------------------------------------------------	---------------------------------------------------	----------	----------

(X)PRI ()GEN ()OTHER: AGGREGATE YTD 1,000.00

MRS SHEILA S COLLINS 3 EGDENOR RD GLOUCESTER MA 01930	HOUSEWIFE	03/23/92	1,000.00
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(X)PRI ()GEN ()OTHER: AGGREGATE YTD 1,000.00

COVINGTON & BURLING PARTNERSHIP PO BOX 7566 1201 PENNSYLVANIA AVE NW WASHINGTON DC 20044	PARTNERS *SEE ATTACHED MEMO FOR PARTNERSHIP BREAKDOWN	03/23/92	1,000.00
------------------------------------------------------------------------------------------------------	-------------------------------------------------------------	----------	----------

(X)PRI ()GEN ()OTHER: AGGREGATE YTD 1,000.00

MAROLD C MANDERS PG BOX 340 DALLAS CENTER IA 50063	FARMER SELF EMPL	03/23/92	500.00
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(X)PRI ()GEN ()OTHER: AGGREGATE YTD 500.00

SUBTOTAL OF RECEIPTS THIS PAGE	RECEIPT AMOUNT	5000.00
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Full Name of Committee: Friends of Senator Nickles

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Norman Seiden 54 Oxford Drive Tenafly NJ 07670	Self Real Estate	02/05/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Henry Taub 111 DeVriese Court Tenafly NJ 07670	ADP Inc. Executive	02/05/92	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mark F. Dalton 78 Brewster Road Scarsdale NY 10583	Tuder Investments President	02/05/92	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
James Cicconi 7019 Deverux Circle Drive Alexandria VA 22310	Akin, Gump, Hauer & Fe Attorney	02/05/92	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Berbert F. Collins 313 Congress Street Boston MA 02210	Boston Capital Partner COB	02/05/92	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Peer Anderson 2661 S Boston Tulsa OK 74114	Citgo Petroleum Vice President	02/05/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

SUBTOTAL of Receipts This Page 3500.00

TOTAL This Period

05043691687

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Full Name of Committee: The Judd Gregg Committee

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Herbert F. Collins 3 Edgenoor Road Gloucester MA 01930	Boston Capital Partner Chairman/Board	10/19/92	1000.00

Receipt for: General Total: \$ 1000.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
William F. Ardinger 30 Westbourne Road Concord NH 03301	Rath, Young & Pignatelli Attorney	10/19/92	500.00

Receipt for: General Total: \$ 500.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Gary Barrett 16 Bloody Brook Road Amherst NH 03031		10/19/92	25.00

Receipt for: General Total: \$ 25.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Barbara W. Bascetta Laurel Street Etna NH 03750	Homemaker	10/19/92	250.00

Receipt for: General Total: \$ 250.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Thomas J. Bascetta Laurel Street Etna NH 03750	Tillicon-Arthur Whitcomb Chairman	10/19/92	750.00

Receipt for: General Total: \$ 750.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
David M. Basile 25 Rosemary Avenue Wakefield MA 01880		10/19/92	50.00

Receipt for: General Total: \$ 50.00

SUBTOTAL of Receipts This Page 2575.00

TOTAL This Period

SCHEDULE A ITEMIZED RECEIPTS
 NAME OF COMMITTEE - RULE FOR SENATE 92
 PERIOD RUN 10/15/92 THRU 11/03/92

PAGE 2 OF 14
 LINE NO. 11A (1)

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 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, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT DATE	RECEIPT AMOUNT
MR HERBERT F COLLINS 3 EDGEMOOR RD GLOUCESTER MA 01930	PRESIDENT BOSTON CAPITAL PARTNERS	10/19/92	1,000.00

() PRI (X) GEN () OTHER: AGGREGATE YTD 1,000.00

MRS SHEILA A COLLINS 3 EDGEMOOR RD GLOUCESTER MA 01930	HOOMEMAKER	10/19/92	1,000.00
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() PRI (X) GEN () OTHER: AGGREGATE YTD 2,000.00

MR ROBERT K DAWSON C/O CASSIDY & ASSOC INC 700 13TH ST NW W400 WASHINGTON DC 20005	CASSIDY & ASSOCS	10/19/92	250.00
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() PRI (X) GEN () OTHER: AGGREGATE YTD 250.00

MR RICHARD J DE AGAZIO 32A CONGRESS ST BOSTON MA 02210	EXECUTIVE BOSTON CAPITAL PARTNERS	10/19/92	1,000.00
--------------------------------------------------------------	--------------------------------------	----------	----------

() PRI (X) GEN () OTHER: AGGREGATE YTD 1,000.00

MR DAN DIENSTBIER 101 WESTCOTT DR03 HOUSTON TX 77007	PRESIDENT ARKLA INC	10/19/92	1,000.00
------------------------------------------------------------	------------------------	----------	----------

() PRI (X) GEN () OTHER: AGGREGATE YTD 1,000.00

DR LYNN A DRAKE 1 LAGFLELLOR PL 02418 BOSTON MA 02114	MD MASS GEN HCSP	10/19/92	1,000.00
-------------------------------------------------------------	---------------------	----------	----------

() PRI (X) GEN () OTHER: AGGREGATE YTD 1,000.00

TOTAL OF RECEIPTS THIS PAGE RECEIPT AMOUNT 5250.00

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 5
FORM 1100 NUMBER 1191

Any information listed 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)

MA Republican Congress Comm

95043691690
333

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month day year)	Amount of Each Receipt this Period
Emma Allen Booth 1200 Lowell Rd Somerville, MA Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Retired	9/20/92	1000.00
Aggregate Year-to-Date > \$ 1000.00			
Donald H Brookfield 100 Hossaway Ave Boston, MA Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Franklin D. Ruggles	7/4/92	500.00
Aggregate Year-to-Date > \$ 500.00			
Robert Tonon Stonehill Drive Stoneham, MA Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Peter Gray Corp	9/20/92	4500.00
Aggregate Year-to-Date > \$ 4500.00			
Herbert Collins ✓ 315 Congress St Boston, MA Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Gaston Capital Partners	7/20/92	500.00 ✓
		8/4/92	2000.00 ✓
		8/4/92	1000.00 ✓
Aggregate Year-to-Date > \$ 3500.00			
Robert Fanning 1000 542 Boston, MA Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Retired	9/20/92	300.00
Aggregate Year-to-Date > \$ 300.00			
[Faded Name] [Faded Address] [Faded City, MA] Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	[Faded Employer]	7/4/92	250.00
Aggregate Year-to-Date > \$ 250.00			
[Faded Name] [Faded Address] [Faded City, MA] Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Frank [Faded]	9/1/92	5000.00
Aggregate Year-to-Date > \$ 5000.00			

SUBTOTAL (if there are 10 or more pages, add page numbers)

TOTAL This Period (add page this two number only)

15050.00

ANY INFORMATION OBTAINED FROM THESE RECEIPTS OR STATEMENTS MAY NOT BE SOLD OR
 REPRODUCED IN ANY MANNER FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR
 COMMERCIAL PURPOSES. THIS IS THE SOLE PROPERTY OF ANY POLITICAL
 COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH COMMITTEE.

NAME, ADDRESS, CITY, STATE, ZIP	EMPLOYER AND OCCUPATION	RECEIPT INFO	
		DATE	AMOUNT
PC 000017029 COLLINS, MR. HERB P 113 CONGRESS STREET BOSTON MA 02210	INFORMATION REQUESTED	04/02/92	250.00
	AGGREGATE YTD 250.00		
PC 000085643 COLLINS, MR. HERB P 1797 E. WISCONSIN AVE MILWAUKEE WI 53202	RETIRED	04/08/92	250.00
	AGGREGATE YTD 500.00		
PC 00002046 COLLINS, MR. HERB P 113 CONGRESS STREET BOSTON MA 02210	BOSTON CAPITAL PARTNERS, INC.	04/27/92	9,000.00
	AGGREGATE YTD 9,000.00		
PC 000169150 COOPER, MR. CHARLES T 7200 CALIFORNIA CENTER DRIVE SAN FRANCISCO CA 94108	INFORMATION REQUESTED	04/10/92	3,000.00
	AGGREGATE YTD 3,000.00		
PC 000216742 COOPER, MR. CHARLES T 601 CALIFORNIA STREET SUITE 2250 SAN FRANCISCO CA 94108	INFORMATION REQUESTED	04/21/92	15,000.00
	AGGREGATE YTD 15,000.00		
PC 000169946 COOPER, MR. JAMES L 303 E. WACKER DR., SUITE 2600 CHICAGO IL 60601	INFORMATION REQUESTED	04/15/92	1,000.00
	AGGREGATE YTD 1,000.00		
PC 000158618 COOK, MR. BOBBY 5645 TADON DRIVE LAS VEGAS NV 89122	INFORMATION REQUESTED	04/10/92	1,500.00
	AGGREGATE YTD 1,500.00		

SUBTOTAL OF RECEIPTS THIS PAGE RECEIPT AMOUNT 30,000.00

9504369169

SCHEDULE A

Department of the Treasury
Internal Revenue Service

Any information copied from such records and documents 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 sources.

NAME OF COMMITTEE (in Full)

Mass Republican Congressional Comm. 1992

9,504,369,1692
37,42263

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received this Period
William Hofmann 225 Rutledge Rd Belmont, MA Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Hofmann Insurance Insurance Agent Aggregate Year-to-Date > \$ 250.00	4/24/92	250.00
Nelson Darling 74 Beach Street Ave Saugus, MA Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Madstock Corp. Trustee Aggregate Year-to-Date > \$ 350.00	4/27/92	350.00
Herbert Collins ✓ 315 Congress St Boston, MA Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Boston Capital Contractors CEO Aggregate Year-to-Date > \$ 1000.00	4/5/92	500.00
MICHAEL SAAD 1247 Washington St. Norwood, MA Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	[Blank] [Blank] Aggregate Year-to-Date > \$ 500.00	6/5/92	500.00
RICHARD WARREN 115 PURITAN Lane Sudbury, MA 01776 Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	GIARDINI/Russell Marketing Director Aggregate Year-to-Date > \$ 2000.00	5/24/92	2000.00
COLBY HEWITT Colby Hewitt Lane Massfield, MA Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	FRANK B. HALL Investments Aggregate Year-to-Date > \$ 1000.00	4/6/92	1000.00
William Russell 24 Bedford Rd Lancaster, MA Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	[Blank] Best Effort Aggregate Year-to-Date > \$ 1000.00	4/10/92	1000.00

SUBTOTAL of Receipts This Page (circle) 6600.00
 TOTAL This Period (see page 10a) (this has number only)

SCHEDULE A-P

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

ITEMIZED RECEIPTS

Use spaces suballocated for each category of the detailed summary page	PAGE	OF THIS PAGE
	192	1700
LINE NUMBER		
17a		

NAME OF COMMITTEE (in Full) **DEM-SINGLE '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 contributions 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
Durkin, Mr. Patrick J. 15 Division Street Greenwich, CT 06830	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO-DATE \$1,000.00	10/31/91	\$1,000.00
Enay, Mr. Nady 8055 Travis Houston, TX 77030	Doctor's Center OCCUPATION President AGGREGATE YEAR TO-DATE \$1,000.00	10/28/91	\$1,000.00
Elkins, Ms. Leslie K. 101 Parish Circle Houston, TX 77024	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO-DATE \$1,000.00	10/28/91	\$1,000.00
Collins, Mr. Robert F. 3 Edgemoor Road Glastonbury, RI 01930	Toston Capital Partners Inc. OCCUPATION Chairman of the Board AGGREGATE YEAR TO-DATE \$1,000.00	10/28/91	\$2,000.00 /02
Danverson, Mr. B. C. 727 Leland Street New Castle, IN 47362	City Securities OCCUPATION Investment Banker AGGREGATE YEAR TO-DATE \$1,000.00	10/28/91	\$1,000.00
Daino, Mr. William D. 23 Samuelson Rd. Weston, CT 06883	Info Requested OCCUPATION Info Requested AGGREGATE YEAR TO-DATE \$500.00	11/14/91	\$500.00
Louis, Mr. Andrew 2011 Harbor Road Northport, NY 11758	Andrew Louis OCCUPATION President AGGREGATE YEAR TO-DATE \$1,000.00	11/14/91	\$1,000.00
...

TOTAL OF RECEIPTS THIS PAGE 10000

TOTAL FOR PERIOD (last page of this form) 10000

TRANSFERRED BY REDESIGNATION PER PAGE

1693

SCHEDULE A-P

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

ITEMIZED RECEIPTS

Use amount indicated for each category of the General Summary Page

1

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NAME OF CONTRIBUTOR		NAME OF EMPLOYER		DATE RECEIVED, DAY, YEAR	AMOUNT OF CASH RECEIPT THIS PERIOD
<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>					
<p>NAME, ADDRESS, CITY, STATE, ZIP CODE Collins, Mr. Robert F. 3 Edgarsville Rd. Gloucester, MA 02210</p>		<p>NAME OF EMPLOYER Info Requested</p> <p>OCCUPATION Info Requested</p> <p>AGGREGATE YEAR-TO-DATE \$1,000.00</p>		<p>05/02/92</p>	<p>-\$1,000.00 /02</p>
<p>NAME, ADDRESS, CITY, STATE, ZIP CODE Collins, Mrs. Sheila S. 3 Edgarsville Rd. Gloucester, MA 02210</p>		<p>NAME OF EMPLOYER Info Requested</p> <p>OCCUPATION Info Requested</p> <p>AGGREGATE YEAR-TO-DATE \$1,000.00</p>		<p>05/02/92</p>	<p>\$1,000.00 /02</p>
<p>NAME, ADDRESS, CITY, STATE, ZIP CODE Pittorio, Mr. Felix J. 81 Boston Road Acton, MA 01720</p>		<p>NAME OF EMPLOYER Info Requested</p> <p>OCCUPATION Info Requested</p> <p>AGGREGATE YEAR-TO-DATE \$1,000.00</p>		<p>05/19/92</p>	<p>\$1,000.00</p>
<p>NAME, ADDRESS, CITY, STATE, ZIP CODE Sobolewski, Mr. Joe T. 191 Ramsey Road Franklin, MA 01701</p>		<p>NAME OF EMPLOYER Info Requested</p> <p>OCCUPATION Info Requested</p> <p>AGGREGATE YEAR-TO-DATE \$1,000.00</p>		<p>05/19/92</p>	<p>\$1,000.00</p>
<p>NAME, ADDRESS, CITY, STATE, ZIP CODE Williams, Mr. Edward L. 400 S. Franklin Street Suite 215 Chicago, IL 60610</p>		<p>NAME OF EMPLOYER Info Requested</p> <p>OCCUPATION Info Requested</p> <p>AGGREGATE YEAR-TO-DATE \$1,000.00</p>		<p>05/05/92</p>	<p>\$1,000.00</p>
<p>NAME, ADDRESS, CITY, STATE, ZIP CODE Ryan, Mrs. Shirley Ann 134 Railroad Avenue Kenilworth, IL 60143</p>		<p>NAME OF EMPLOYER Info Requested</p> <p>OCCUPATION Info Requested</p> <p>AGGREGATE YEAR-TO-DATE \$1,000.00</p>		<p>05/25/92</p>	<p>\$1,000.00</p>
<p>NAME, ADDRESS, CITY, STATE, ZIP CODE Cullinan, Mr. Richard 324 Valley View Court Peoria, IL 61615</p>		<p>NAME OF EMPLOYER RA Cullinan & Sons</p> <p>OCCUPATION Contractor</p> <p>AGGREGATE YEAR-TO-DATE \$1,000.00</p>		<p>05/25/92</p>	<p>\$1,000.00</p>
<p>NAME, ADDRESS, CITY, STATE, ZIP CODE Watts, Dr. Dennis L. 81 S.W. 101st Avenue Plantation, FL 33324</p>		<p>NAME OF EMPLOYER Self</p> <p>OCCUPATION Physician</p> <p>AGGREGATE YEAR-TO-DATE \$1,000.00</p>		<p>05/18/92</p>	<p>-\$1,000.00 /02</p>
<p>SUBTOTAL OF RECEIPTS THIS PAGE (optional)</p>					<p>\$4,000.00</p>
<p>TOTAL THIS PERIOD (last page this line number of)</p>					

-Redistribution or Redesignation Requested

92037442349

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Full Name of Committee: Friends of Senator Nickles

A. Full Name, Address, Zip Employer/Occupation Date Receipts

W. A. Joseph
3017 Regency Court
Oklahoma City OK 73120 Globe Life & Accident
Vice President 08/04/92 50.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

B. Full Name, Address, Zip Employer/Occupation Date Receipts

Kenneth Merideth
P. O. Box 388
Okemah OK 74859 Retired 07/29/92 100.00

Receipt for: Primary Year-to-Date Total: \$ 200.00

C. Full Name, Address, Zip Employer/Occupation Date Receipts

Dewayne Fry
Route 2, Box 178
Seyes OK 73947 Self
Farmer 08/04/92 250.00

Receipt for: Primary Year-to-Date Total: \$ 750.00

D. Full Name, Address, Zip Employer/Occupation Date Receipts

Herbert F. Collins
3 Edgemoore Road
East Gloucester MA 01930 Boston Capital Partner
COB 08/04/92 1000.00 ✓

Receipt for: General Year-to-Date Total: \$ 2000.00

E. Full Name, Address, Zip Employer/Occupation Date Receipts

Maggie Marsey
328 W Norma
Sapulpa OK 74066 Retired 08/03/92 150.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

F. Full Name, Address, Zip Employer/Occupation Date Receipts

Lee Mah
3120 Williams
Woodward OK 73801 Mah's Garden Restaura
Owner 08/03/92 100.00

Receipt for: Primary Year-to-Date Total: \$ 350.00

SUBTOTAL of Receipts This Page 1650.00

TOTAL This Period

02047601605

REPUBLICAN NATIONAL COMMITTEE

PAGE 29

ITEMIZED REPORT COVERS PERIOD FROM 10/15/92 THRU 11/25/92 OVER \$200.00

NAME AND ADDRESS	OCCUPATION/PLACE OF BUSINESS	DATE	TOTAL CHARGES PERIOD 10-10-92	
Mr. Clifford C. Callings Jr. 35 Evans Lane Haverford PA 19041	Investment Banker Levy Shear Inc.	10/15/92	\$150.00	\$250.00
Mrs. Elizabeth C. Callinan 5 Sweetgrass Lane Rolling Hill Estates OH 92874	INFORMATION REQUESTED 10/25/92	10/25/92	\$25.00	\$211.00
Mr. Floyd Collins Villa #1 25188 Marion Ave. Punta Gorda FL 33550	Retired	10/20/92	\$100.00	\$300.00
Mr. Gordon S. Collins 17916 87 Place S.E. Kirkland WA 98034	INFORMATION REQUESTED 10/25/92	10/15/92 10/25/92	\$80.00 \$90.00	\$270.00
Mrs. Helen E. Collinbar 1560 East 27th Place Ann AR 70305	Housewife	10/20/92 11/01/92	\$95.00 \$90.00	\$185.00
Mr. Herbert F. Collins 3 Bilgewater Road Gloucester MA 01930	Chairman of the Board Greater Boston Dev. Inc.	10/15/1992	\$15,000.00	\$15,000.00 ✓
Mr. J. W. Collins 6709 Ave. N. Santa Fe TX 77510	INFORMATION REQUESTED 10/28/92	10/28/92	\$40.00	\$25.00
Jr. James D. Collins 3221 Oxford Drive Durham NC 27707	INFORMATION REQUESTED 10/29/92	10/21/92 10/22/92 10/22/92 10/26/92 10/29/92	\$20.00 \$20.00 \$25.00 \$25.00 \$50.00	\$230.00
Ms. Jan S. Collins 2700 Central Avenue Alexandria VA 22302	INFORMATION REQUESTED 11/04/92	11/04/92	\$500.00	\$500.00

05943601696

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Full Name of Committee: Citizens for Congresswoman Olympia J. Snowe

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Harold Alford 127 Silver Street Waterville ME 04901	Dexter Shoe Co. executive	06/09/92	1000.00

Receipt for: Primary Year-to-Date Total: \$ 2000.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Harold Alford 127 Silver Street Waterville ME 04901	Dexter Shoe Co. executive	06/09/92	1000.00

Receipt for: General Year-to-Date Total: \$ 2000.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Douglas Blanchard 1112 Park Ave. New York City NY 10120	Spectra Sped Trans Executive	06/29/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Herbert F. Collins 313 Congress Street Boston MA 02210	Boston Capital Partner Ch. of Board	06/15/92	750.00

Receipt for: General Year-to-Date Total: \$ 750.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mrs. Henry P. Frigon 5830 Overhill Rd Shawnee Mission KS 66208	Walmart Cards, Inc. Exec. V.P.	06/02/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mrs. Kaylene Green Post Office Box 419 Oakton VA 22124	Paul Magliocchetti Executive	06/02/92	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

SUBTOTAL of Receipts This Page 3750.00

TOTAL This Period

0
9
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4
7
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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: Friends of Newt Gingrich

A. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Peter J. Mallen 3765 Club Drive Atlanta GA 30319	Mallen Ins. Co. Sales	08/27/92	500.00

Receipt for: General Year-to-Date Total: \$ 500.00

B. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mrs. Carolyn C. Wright 1242 Edwards Road Cincinnati OH 45208	Information Requested Information Requested	07/16/92	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

C. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Russell H. Heil 200 Redding Ridge Peachtree City GA 30269	Delta Information Requested	07/20/92	250.00

Receipt for: Primary Year-to-Date Total: \$ 250.00

D. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. John H. Fitzpatrick Sunset Captiva Captiva FL 33924	Red Lion Inn Owner	07/20/92	500.00

Receipt for: Primary Year-to-Date Total: \$ 500.00

E. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Herbert Collins Edgemore Road Gloucester MA	Boston Capital Partner	07/20/92	1000.00

Receipt for: Primary Year-to-Date Total: \$ 1000.00

F. Full Name, Address, Zip	Employer/Occupation	Date	Receipts
Mr. Robert D. Stuart Jr. 121 N Clark Street #340 Chicago IL 60610	Quaker Oaks Co. Chairman	07/31/92	1000.00

Receipt for: General Year-to-Date Total: \$ 1000.00

SUBTOTAL of Receipts This Page 3750.00

TOTAL THIS PERIOD

02011114091

SCHEDULE A

ITEMIZED RECEIPTS

Page 22 of 102
For file number 118

RE-ELECT PACKWOOD COMMITTEE

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 and Address	Occupation	Date	Amount This Period	Aggregate Year-to-Date
✓ MR HERBERT F COLLINS 313 CONGRESS ST BOSTON MA 02210	INVESTMENT BOSTON CAPITAL PARTNERS LTD PRIMARY	19910715	\$1,000.00	✓
✓ MR HERBERT F COLLINS 313 CONGRESS ST BOSTON MA 02210	INVESTMENT BOSTON CAPITAL PARTNERS LTD GENERAL	19910715	\$1,000.00	✓ \$2,000.00
MR JOSEPH J COLLINS 300 FIRST STAMFORD PL STAMFORD CT 068088732	CHAIRMAN & CEO AMERICAN T.V. & COMMUNICATI PRIMARY	19910831	\$1,000.00	
MR JOSEPH J COLLINS 300 FIRST STAMFORD PL STAMFORD CT 068088732	CHAIRMAN & CEO AMERICAN T.V. & COMMUNICATI PRIMARY	19910831	\$1,000.00	\$2,000.00
MR NICK P. COLLINS 2141 NW 25TH PORTLAND, OR 97210	INFORMATION REQ PRIMARY	19911224	\$1,000.00	\$1,000.00
MR BRIAN CONBOY 2208 WYOMING AVE NW WASHINGTON DC 200083868	V.P. TIME WARNER INC. PRIMARY	19910831	\$1,000.00	\$1,000.00
MR EDWIN E E CONE 2130 OLIVE ST EUGENE OR 974052838	INFORMATION REQ PRIMARY	19911012	\$1,000.00	
MR EDWIN E E CONE 2130 OLIVE ST EUGENE OR 974052838	INFORMATION REQ GENERAL	19911012	\$1,000.00	\$2,000.00
JUNE E CONE 2130 OLIVE ST EUGENE OR 974052838	INFORMATION REQ PRIMARY	19911012	\$1,000.00	
JUNE E CONE 2130 OLIVE ST EUGENE OR 974052838	INFORMATION REQ GENERAL	19911012	\$1,000.00	\$2,000.00
MRS MARSHA B CONGDON 1209 SW 6TH AVE # 603 PORTLAND OR 972041089	VICE PRESIDENT U.S. WEST COMMUNICATIONS PRIMARY	19911012	\$250.00	\$250.00
MR GARY L CONKLING 13730 S W LATIGO CR BEAVERTON OR 97005	INFORMATION REQ PRIMARY	19911224	\$250.00	\$250.00

SCHEDULE A

EXPANDED RECEIPTS

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: DEAN GALLO FOR CONGRESS COMMITTEE

ERIC F ROSS 111 NORTHFIELD AVENUE WEST ORANGE, NJ 07052	EMPLOYER: REQUESTED OCCUPATION: Date	Amount
	04/12/91	1,000.00
RECEIPT FOR: Primary 92	AGGREGATE YTD: 1,000.00	

CYNTHIA L BROWN 125-11TH STREET, S.E. WASHINGTON, DC 20003	EMPLOYER: REQUESTED OCCUPATION: Date	Amount
	05/03/91	500.00
RECEIPT FOR: Primary 92	AGGREGATE YTD: 500.00	

JAMES P FABIANI 347 BELLEVIEW ROAD MC LEAN, VA 22102	EMPLOYER: REQUESTED OCCUPATION: Date	Amount
	05/03/91	500.00
RECEIPT FOR: Primary 92	AGGREGATE YTD: 500.00	

PETER J FINNERTY SUITE 560 1331 PENNSYLVANIA AVENUE, N.W. WASHINGTON, DC 20004	EMPLOYER: SEA-LAND, INC. OCCUPATION: VICE PRESIDENT Date	Amount
	05/03/91	500.00
RECEIPT FOR: Primary 92	AGGREGATE YTD: 500.00	

RONALD N KOCH 89 MAYFAIR DRIVE WEST ORANGE, NJ 07052	EMPLOYER: ACCARDI, KOCH & NITTI OCCUPATION: ATTORNEY Date	Amount
	05/03/91	1,000.00
RECEIPT FOR: Primary 92	AGGREGATE YTD: 1,000.00	

HERBERT F COLLINS 312 CONGRESS STREET BOSTON, MA 02110	EMPLOYER: BOSTON CAPITAL PARTNERS, INC. OCCUPATION: VICE PRESIDENT Date	Amount
	05/03/91	500.00
RECEIPT FOR: Primary 92	AGGREGATE YTD: 500.00	

GRAND TOTAL \$ 4,000.00

0004956917008





FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20461

January 28, 1994

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

RE: MUR 3886

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 Herbert F. Collins. 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 3886. 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, on

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

95043691701



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

January 28, 1994

Herbert F. Collins
3 Edgemoor Road
Gloucester, MA 01930

RE: MUR 3886

Dear Mr. Collins:

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 3886. 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.

95043691702

Herbert F. Collins
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, sr

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosures

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

95043691703



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20542

FEB 15 1994

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

RE: MUR 3886

Dear Mr. Huckaby:

The Federal Election Commission received a complaint which indicates that the Bush-Quayle '92 Primary Committee, Inc., Bush-Quayle '92 Compliance Committee, Inc. ("Committees") 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 3886. 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 Committees 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.

95043691704

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

95043691705

09C 0981

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011
(202) 628-6600 • FACSIMILE (202) 434-1690

February 9, 1994

94 FEB -9 PM 5:32

FEDERAL RECEIVED
COMMISSION

Mary L. Taksar
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3886 - Herbert F. Collins

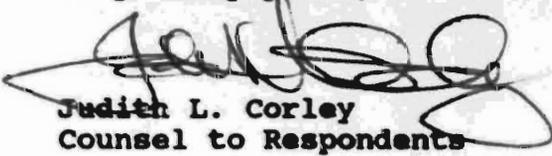
Dear Ms. Taksar:

Enclosed is a designation of counsel in the above-referenced Matter Under Review.

The complaint was received by the Respondent on or about February 3. A response would be due by February 18. In order to have sufficient time to gather the necessary information to prepare a response, we ask for an extension of 20 days. The new response date would be March 10, 1994.

If you have any questions or need additional information, please contact the undersigned.

Very truly yours,



Judith L. Corley
Counsel to Respondents

enclosure

[09901-0001/D/A940400.035]

95043691706

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3886

NAME OF COUNSEL: Judith L. Corley/Robert F. Bauer

ADDRESS: Perkins Coie

607 - 14th Street, N.W. - Suite 800

Washington, DC 20005-2011

TELEPHONE: (202) 628-6600

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.

02/08/94
Date


Signature

RESPONDENT'S NAME: Herbert F. Collins

ADDRESS: 3 Edgemoor Road

Gloucester, MA 01930

TELEPHONE: HOME (508) 283-7174

BUSINESS (617) 439-0072

95043691707



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

FEB 18 1994

Judith L. Corley, Esquire
Perkins Coie
607 14th Street, N.W.
Suite 800
Washington, DC 20005-2011

RE: MUR 3886
Herbert F. Collins

Dear Ms. Corley:

This is in response to your letter dated February 9, 1994, which we received on that same date, requesting an extension of 20 days to respond to the complaint in this matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on March 10, 1994.

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

Sincerely,

Karen White
for
Joan McEnery
Paralegal

95043691708



RECEIVED
COMMISSION
94 MAR -3 PM 12:20

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 3886

Dear Ms. Taksar:

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

The information contained in Exhibits 1 and 2 accompanying the MUR is incomplete. Mr. Herbert F. Collins made a \$ 2,000 contribution to the Primary Committee on October 29, 1991. On December 22, 1991, the Primary Committee received written authorization from Mr. Collins and his wife, Mrs. Sheila Collins, to reattribute to Mrs. Collins \$ 1,000 from the October 29, 1991 contribution. Mr. Collins did not make any additional contributions to the Primary Committee. Therefore, the Primary Committee is not in violation of any FEC regulation with respect to Mr. Collins' contribution.

Mr. Collins then made a \$ 2,000 contribution to the Compliance Committee on February 4, 1992. On March 2, 1992, the Compliance Committee received written authorization from Mr. and Mrs. Collins to reattribute to Mrs. Collins \$ 1,000 from the February 4, 1992 contribution. Mr. Collins made no additional contribution to the Compliance Committee. Therefore, the Compliance Committee is not in violation of any FEC regulation with respect to Mr. Collins' contribution.

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 these Committees with respect to MUR

Sincerely:

S. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc., and
Bush-Quayle '92 Compliance Committee, Inc.

95043691709

PERKINS COIE

06C 468

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. • WASHINGTON, D.C. 20005-2011
(202) 628-6600 • FACSIMILE (202) 434-1690

94 MAR 10 PM 5:29

RECEIVED
FEDERAL ELECTION COMMISSION

March 10, 1994

Joan McEnery
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: MUR 3886 - Herbert F. Collins

Dear Ms. McEnery:

This is in response to the Commission's letter dated January 28, 1994, notifying Mr. Collins that a complaint had been filed against him by the Center for Responsive Politics.

The complaint charges that Mr. Collins exceeded the \$25,000 annual individual contribution limit during calendar year 1992 and attaches a list of contributions purportedly made by Mr. Collins during that year.

This case is a simple one of a misunderstanding of the application the federal campaign laws to the individual contribution limit. The Center for Responsive Politics filed 64 complaints alleging similar violations by individuals. It is, apparently, a common misunderstanding.

Mr. Collins made a series of contributions during 1992 on a joint checking account. He believed these contributions to be from both himself and his wife jointly. In many cases, the contributions were made in connection with particular fundraising events that both he and his wife attended. He was unaware at the time of the requirement for both spouses to sign the contribution check or an accompanying letter.

In early October 1993, Mr. Collins received a letter from James Peterson of The Los Angeles Times. Exhibit 1. The letter noted that the paper was doing a story on individuals who may have exceeded their \$25,000 contribution limit. Attached to the letter was a list of contributions attributed to Mr. Collins for 1992. This was the first time Mr. Collins was aware that his contributions may not have been in compliance with the federal campaign laws.

[21852-0001/DA940680 023]

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Joan McEnery
March 10, 1994
Page 2

Mr. Collins immediately contacted the Federal Election Commission and asked for a print-out from its data base of his contributions. Between the FEC's and The Los Angeles Times' list, it was clear to Mr. Collins that the contributions he had made had been erroneously attributed entirely to him, with none to his wife. On October 19, 1993, Mr. and Mrs. Collins sent out letters to the various candidates and committees notifying them of their original intention to have the contributions attributed equally to them. Exhibit 2. Copies of the letters also were sent to Kent Cooper of the FEC on October 28.¹ Exhibit 3.

Since that time, Mr. Collins has become aware that reattributions of contributions may not be made by a campaign or committee unless the request for the reattribution is received within 60 days of the original receipt of the contribution. As a result, Mr. Collins has now requested or received refunds of his 1992 contributions from the following sources:

Republican National Committee	\$7,500
Dole for Senate	\$2,000

Exhibit 4. In addition, Mr. Collins has received a letter from the President's Dinner that his \$9,000 contribution from 1992 has been transferred to the nonfederal accounts of the participating committees, and a letter from the Massachusetts Republican Party that \$500 of his 1992 contributions has been transferred to the Committee's nonfederal account. Exhibit 5. These refunds and adjustments put Mr. Collins' contributions for 1992 well below the \$25,000 limit.

Mr. Collins has also undertaken several efforts to ensure that his contributions in the future are in full compliance with the federal campaign laws. He has retained this law firm to advise him on future political contributions and we are working with him to establish a system for tracking his (and his wife's) contributions for contribution limits purposes.

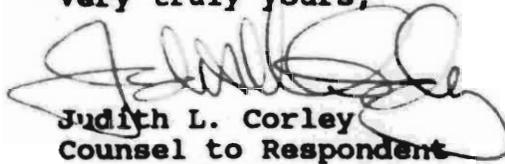
¹ The letter to Kent Cooper mistakenly refers to records from the 1993-1994 election cycle. As shown in the letters in Exhibit 2, which were attached to the letter to Kent Cooper, Mr. Collins was referring to his contribution records from the 1991-1992 election cycle.

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Joan McEnery
March 10, 1994
Page 3

Mr. Collins had no intention of violating the federal campaign laws. His misunderstanding of the application of the \$25,000 limit is, as shown by the number of individuals against whom Public Citizen complaints were filed, very common. He took immediate steps upon realizing his error to correct the situation, and has taken all reasonable steps to ensure that no violation occurs in the future. Given these mitigating circumstances, we ask that the Commission take no action on this complaint.

Very truly yours,



Judith L. Corley
Counsel to Respondent

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COLLINS

EXHIBIT 1

Los Angeles Times

WASHINGTON BUREAU

October 7, 1993

Mr. Herbert F. Collins
Boston Capital Partners
Boston, MA

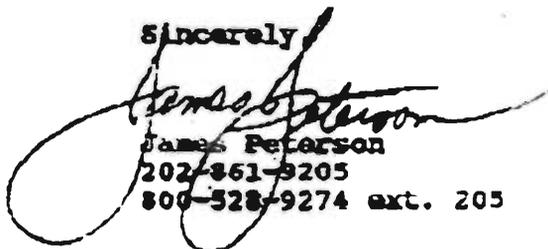
Dear Mr. Collins:

I am currently working on a story which looks at enforcement of federal political contribution limits—or the lack thereof. Specifically, we have identified 141 people who appear to have violated the \$25,000-per-year limit on contributions to federally registered political committees. You are one such contributor. I have attached a listing of the contributions attributed to you by the Federal Election Commission.

As you probably know, contributions to political action committees and political party committees are counted in the year they are made. Contributions to federal candidates are counted toward the limits in the year which the candidate stands for election, regardless of when the contribution was made. For example, your \$1,000 contribution on July 15, 1991 to Bob Packwood's campaign is counted toward the 1992 limit.

My editors have asked that this project be completed at the end of this week and I would appreciate continuing our conversation from Thursday morning at your earliest convenience.

Sincerely,


James Peterson
202-861-9205
800-528-9274 ext. 205

INTERNATIONAL SQUARE / 1675 BYE STREET, N.W. / WASHINGTON, D.C. 20008-5402 / TELEPHONE (202) 893-4650

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Herbert F. Collins Boston Capital Partners Boston, MA

	Date of Contrib.	Amount	Year Credited
RNC	07/17/91	10,000	91
Pierce for Congress	04/30/91	1,000	91
Pierce for Congress	05/21/91	1,000	91
Campaign America (Dole's PAC)	04/23/91	5,000	91
Total 1991:		\$17,000	
President's Dinner	04/27/92	9,000	92
Massachusetts Rep. state Comm	06/05/92	1,000	92
Massachusetts Rep. State Comm	06/05/92	500	92
Massachusetts Rep. State Comm	07/20/92	500	92
Massachusetts Rep. State Comm	08/04/92	2,000	92
Massachusetts Rep. state Comm	08/04/92	1,000	92
Bob Dole	03/23/92	1,000	92
Newt Gingrich	07/20/92	1,000	92
RNC	10/16/92	15,000	92
Olympia Snowe	06/15/92	750	92
Don Nickles	02/05/92	1,000	92
Don Nickles	08/04/92	1,000	92
Bob Packwood	07/15/91	1,000	92
Bob Packwood	07/15/91	1,000	92
McGrath for Congress	04/27/92	1,000	92
Dean Gallo	05/03/91	500	92
Bob Dole	10/19/92	1,000	92
Bush/Quayle	10/29/91	2,000	92
Bush/Quayle	12/22/91	-1,000	92
Bush/Quayle	02/04/92	2,000	92
Bush/Quayle	03/02/92	-1,000	92
Butler for Congress	05/28/92	500	92
Dan Daly	05/13/92	250	92
Judd Gray	10/19/92	1,000	92
Total 1992:		\$42,000	
(RNC)	02/05/92	15,000	
Total Soft Money:		\$15,000	

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*Public Disclosure
202-219-4140
Contributor records in
my name -*

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COLLINS

EXHIBIT 4

V faxed to Judy Cortey

2766

REPUBLICAN NATIONAL FINANCE COMMITTEE

310 FIRST STREET, SE
WASHINGTON, D.C. 20003

DECEMBER 13 19 93 ~~171425~~

PAY TO THE ORDER OF HERBERT F. COLLINS

\$ 7,500.00***

SEVEN THOUSAND FIVE HUNDRED AND 00/100

DOLLARS

SIGNET BANK

1992 REFUND

⑆00002766⑆ ⑆056004087⑆ 551⑆2220643⑆

95043691

1641

DOLE FOR SENATE '92
P.O. BOX 15471
WASHINGTON, D.C. 20003-0471

March 8, 1994

92-100
503

PAY
TO THE
ORDER OF

Herbert F. Collins

\$ 2,000.00

Two Thousand Dollars and 00/100

DOLLARS

First & Virginia Bank & Trust Co.
Alexandria, Va.

FOR refund of contribution

Jo Anne L. Coe

⑆00001641⑆ ⑆056001066⑆ ⑆00-41050-0⑆

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95043691719

COLLINS
EXHIBIT 5



Phil Gramm, Chairman
National Republican
Senatorial Committee

Bill Paxon, Chairman
National Republican
Congressional Committee

Bob Dole
Republican Leader of the Senate

Robert H. Michel
Republican Leader of the House

March 1, 1994

Mr. Christopher T. Cushing
Managing Director
The Commonwealth Group
One Massachusetts Ave., NW
Washington, DC 20001

Dear Mr. Cushing:

Following, please find a copy of the request I sent to the NRCC and the NRSC regarding Mr. Collins' 1992 President's Dinner contribution.

These requests generally take a few days to accommodate, and they will appear on the next FEC filing by each Committee.

If you have any questions or concerns, please do not hesitate to call me at 202/659-1771.

Sincerely,

Christopher J. Ware
Comptroller/ Deputy Director, Administration

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Phil Gramm, Chairman
National Republican
Senatorial Committee

Bob Dole
Republican Leader of the Senate

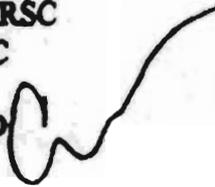


Bill Paxon, Chairman
National Republican
Congressional Committee

Robert H. Michel
Republican Leader of the House

MEMORANDUM

TO: Sonya Vazquez, NRSC
Mark Todd, NRCC

FROM: Chris Ward, RSHD 

DATE: March 1, 1994

RE: Herbert F. Collins' 1992 TPD Contribution

Attached, please find a copy of the letter sent by Christopher Cushing regarding Herbert Collins' 1992 President's Dinner contribution.

Since The 1992 Dinner accounts do not have the money to accommodate Mr. Collins, each Committee will have to transfer \$4,500.00 from the federal account to the non-federal account. Also, a letter must be sent to Mr. Collins informing him that the transfer has been made, with copies of the letter sent to Mr. Cushing and The Dinner.

Thank you, and please call me if you have any questions.

Mr. Herbert F. Collins
3 Edgemoor Road
Glouster, MA 01930

Mr. Christopher T. Cushing
The Commonwealth Group
One Massachusetts Ave., NW
Washington, DC 20001

1101 17th Street, N.W. • Suite 808 • Washington, D.C. 20036 • (202) 669-1771 • Fax (202) 833-2491

Paid for by The Republican Senate-House Dinner Committee. Proceeds will be divided evenly between the National Republican Senatorial Committee and the National Republican Congressional Committee for the benefit of Republican candidates.

Donations may be designated or reflected in order to comply with federal limits on political contributions.

Contributions to The Republican Senate-House Dinner are not deductible for federal tax purposes.

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Massachusetts Republican Party

Jim Rappaport
Chairman



617-725-1994
800-622-VOTE
617-367-7343 FAX

114 State Street · Boston, Massachusetts · 02109

TO: Mr. Herbert F. Collins
FROM: Michelle Tavares *M.T.*
Administrative Director, MRP
DATE: March 10, 1994
RE: 1992 Contribution

As per your request, today I transferred \$500.00 of your 1992 contributions to the Massachusetts Republican Party's federal account, to the Massachusetts Republican Party's non-federal account.

This leaves your contributions for 1992 at \$5,000.00 in our federal account and \$1,000.00 in our state account. The total amount of your 1992 contributions remains at the yearly maximum of \$6,000.00.

If I can be of any further assistance, please do not hesitate to call.

Paid for by the Massachusetts Republican Party

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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

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

Mar 10 3 24 PM '95

FIRST GENERAL COUNSEL'S REPORT

SENSITIVE

PRE-MUR 290 and MUR 3886
DATE COMPLAINT RECEIVED: 1-21-94
DATE ACTIVATED: 9-7-94
STAFF MEMBER: Frances B. Hagan

COMPLAINANT: Center for Responsive Politics

RESPONDENTS: Herbert F. Collins
Bush-Quayle '92 Primary Committee, Inc.
Bush-Quayle '92 Compliance Committee, Inc.
J. Stanley Huckaby, as treasurer

RELEVANT STATUTES: 2 U.S.C. § 441a(a)(3)
2 U.S.C. § 441a(a)(1)(B)
2 U.S.C. § 441a(a)(1)(C)
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Disclosure reports; FEC indexes

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was referred sua sponte by the respondent, Herbert F. Collins, to the Federal Election Commission on October 25, 1993. It is also the subject of a complaint filed on January 25, 1994, by Ellen S. Miller, Executive Director of the Center for Responsive Politics. The complaint alleges that Mr. Collins made contributions attributable to calendar year 1992 that exceeded the \$25,000 annual contribution limit at 2 U.S.C. § 441a(a)(3). Initial review of the complaint indicated a possible receipt of excessive contributions by the Bush-Quayle '92 Primary Committee, Inc., Bush-Quayle '92 Compliance Committee, Inc., and J. Stanley Huckaby, as treasurer. Respondents have submitted replies to the complaint.

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II. FACTUAL AND LEGAL ANALYSIS

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to \$25,000. The statute explicitly states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held. See 11 C.F.R. § 110.5(c)(2).

2 U.S.C. § 441a(a)(1)(B) limits contributions by an individual to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, to an aggregate of \$20,000 in any calendar year.

2 U.S.C. § 441a(a)(1)(C) limits contributions by an individual to any other political committee to an aggregate of \$5,000 in a calendar year.

Complainant alleges that based on FEC records, Mr. Collins made contributions attributable to the 1992 calendar year totaling \$42,000, or \$17,000 in excess of the \$25,000 annual limit. This Office's review of the Commission's records and indexes revealed that Mr. Collins made the following contributions attributable to the 1992 calendar year:

<u>DATE</u>	<u>AMOUNT</u>	<u>P/G</u>	<u>COMMITTEE</u>
11/30/87	1,000	P 92	FRIENDS OF SEN. D'AMATO '92
10/20/88	500	G 92	FRIENDS OF SEN. D'AMATO '92
01/19/89	1,000	P 92	RUDMAN FOR SENATE COMMITTEE
04/10/89	500	G 92	FRIENDS OF SENATOR D'AMATO '92
09/19/89	1,000	P 92	COHEN FOR SENATOR
05/03/91	500	P 92	DEAN GALLO FOR CONGRESS COMMITTEE
07/15/91	1,000	P 92	RE-ELECT PACKWOOD COMMITTEE
07/15/91	1,000	G 92	RE-ELECT PACKWOOD COMMITTEE

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10/09/91	500	P	92	COHEN FOR SENATOR
10/29/91	2,000	P	92	BUSH - QUAYLE '92 PRIMARY CMTE, INC.
11/04/91	1,000	G	92	THORNBURGH FOR SENATE COMMITTEE
12/22/91	-1,000 ¹	P	92	BUSH - QUAYLE '92 PRIMARY CMTE, INC.
02/04/92	2,000	G	92	BUSH - QUAYLE '92 COMP CMTE INC
02/05/92	1,000	P	92	FRIENDS OF SENATOR DON NICKLES
03/02/92	-1,000 ²	G	92	BUSH - QUAYLE '92 COMP CMTE, INC.
03/23/92	1,000 ³	P	92	DOLE FOR SENATE '92
04/27/92	4,500	P	92	NATIONAL REPUBLICAN SEN COMMITTEE
04/27/92	4,500	P	92	NATIONAL REPUBLICAN CONG COMMITTEE
04/27/92	9,000 ⁴	P	92	PRESIDENT'S DINNER/AKA 1992 REP SEN
04/27/92	1,000	P	92	MCGRATH FOR CONGRESS COMMITTEE
05/13/92	250	P	92	DAN DALY FOR US CONGRESS COMMITTEE
05/28/92	500	P	92	BUTLER FOR CONGRESS
06/05/92	1,000	P	92	MASS REPUBLICAN STATE COMMITTEE
06/05/92	500	P	92	MASS REPUBLICAN STATE COMMITTEE
06/15/92	750	G	92	CITIZENS FOR OLYMPIA SNOWE
07/20/92	1,000	P	92	FRIENDS OF NEWT GINGRICH - 1992
07/20/92	500	P	92	MASS REPUBLICAN STATE COMMITTEE
08/04/92	1,000	G	92	FRIENDS OF SENATOR DON NICKLES
08/04/92	2,000	P	92	MASS REPUBLICAN STATE COMMITTEE
08/04/92	1,000 ⁵	P	92	MASS REPUBLICAN STATE COMMITTEE
10/16/92	15,000 ⁶	P	92	REPUBLICAN NATIONAL COMMITTEE - RNC
10/19/92	1,000	G	92	JUDD GREGG COMMITTEE
10/19/92	1,000	G	92	DOLE FOR SENATE '92
01/25/93	1,000 ⁸	G	92	CITIZENS FOR TORKILDSEN

1992 TOTAL: \$48,500

Thus, for the 1992 calendar year, it appears that Herbert F.

1. Timely reattribution made within 60 days of the committee's receipt as required by 11 C.F.R. § 103.3(b).
2. Timely reattribution made within 60 days of the committee's receipt as required by 11 C.F.R. § 103.3(b).
3. Contribution refunded March 8, 1994.
4. Joint fundraiser memo entry for National Republican Senatorial and National Republican Congressional Committees. Transfers of \$4,500 made to non-federal accounts of each participating committee, March 1994.
5. Five hundred dollars transferred to non-federal account on March 10, 1994.
6. RNC refunded \$7,500 to contributor on December 13, 1993.
7. Contribution refunded March 8, 1994.
8. Contribution made to retire 1992 debt.

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Collins made contributions totaling \$48,500 or \$23,500 in excess of the \$25,000 annual contribution limit. 2 U.S.C. § 441a(a)(3).

Responding to the complaint, Mr. Collins argues that he misunderstood the application of election laws to the individual contribution limit. As explained by counsel, during 1992 Mr. Collins made a number of contributions from a joint checking account. Respondent apparently believed the contributions on the joint account were from both himself and his wife. According to respondent's counsel, Mr. Collins was not aware at the time of the contributions of the requirement that contributions made by more than one person are to include each contributor's signature on the check or an accompanying letter. 11 C.F.R. § 110.1(k)(1) and (2).

Prompted initially by inquiries in October 1993 from the Los Angeles Times concerning an upcoming newspaper article on individuals exceeding the annual limit, respondent obtained a listing of his contributions from the FEC Public Disclosure Division and examined his 1992 contributions. As a result of Mr. Collins' review and subsequent contact with certain recipient committees, remedial actions were taken that address the excessive portion of his contributions (\$23,500).

First, on October 19, 1993, Mr. and Mrs. Collins sent letters reattributing certain 1992 (and 1993) contributions to Mrs. Collins. Attachment C at 8-35. Then, between December 1993 and March 1994, two recipient committees refunded contributions attributable to 1992 totaling \$9,500, and another \$9,500 was transferred from the federal to the non-federal accounts of three party committees. The reattributions and refunds significantly

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reduce the 1992 contributions attributable to Mr. Collins, bringing the amount below the annual contribution limit. However, coming two years or more after the contributions were made, these remedial adjustments are not timely pursuant to 11 C.F.R. §§ 103.3(b) and 110.1(k), and do not vitiate the violation. Thus it appears that Mr. Collins made \$48,500 in contributions attributable to calendar year 1992, thereby exceeding the \$25,000 annual contribution limit by \$23,500. 2 U.S.C. § 441a(a)(3).

In addition, in 1992 Mr. Collins exceeded by \$4,000 the \$20,000 per calendar year limit on contributions to national political party committees by making aggregate contributions of \$24,000 to the President's Dinner Committee and the Republican National Committee ("RNC"). 2 U.S.C. § 441a(a)(1)(B).⁹ See chart above. Finally, Mr. Collins exceeded by \$5,000 the \$5,000 per calendar year limit on contributions to any political committees other than those established by a national party or authorized by a candidate by making contributions of \$10,000 to the Massachusetts Republican State Committee in 1988 (\$5,000 each on October 6 and November 1, 1988.). 2 U.S.C. § 441a(a)(1)(C).¹⁰

9. Respondent reattributed \$7,500 of Respondent's \$15,000 contribution to his wife on October 19, 1993. The RNC refunded \$7,500 of the 1992 contribution to Mr. Collins on December 13, 1993. The refund is applicable to Mr. Collins' portion of the contribution. As noted herein, neither remedial action was timely.

10. Our review indicated that Mr. Collins' wife Sheila Collins also made contributions totaling \$10,000 to the Massachusetts Republican State Committee during 1988.

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Responding to the complaint notification, the Bush-Quayle '92 Primary Committee and the Bush-Quayle '92 Compliance Committee ("the Committees") state that each committee received contributions of \$2,000 from Mr. Collins which were reattributed in writing to Mr. and Mrs. Collins in a timely manner. Attachment D. The Committees attest that they provided the appropriate supporting documentation to auditors during the Commission's post-election audit. The reattribution is reflected on FEC indexes and included in the contribution list above. Therefore, this Office recommends that the Commission find no reason to believe that the Bush-Quayle '92 Primary Committee and the Bush-Quayle '92 Compliance Committee and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. § 441a(f) in this matter.

Further, this office recommends that the Commission find reason to believe that Herbert F. Collins violated 2 U.S.C. § 441a(a)(3) and 2 U.S.C. §§ 441a(a)(1)(B) and (C). We recommend that the Commission merge Pre-NUR 290 (filed sua sponte) into NUR 3886, to be called NUR 3886.

III. PRE-PROBABLE CAUSE CONCILIATION AND CIVIL PENALTY

95043691728

IV. RECOMMENDATIONS

1. Merge Pre-MUR 290 into MUR 3886, and hereinafter refer to this matter as MUR 3886.
2. Find reason to believe that Herbert F. Collins violated 2 U.S.C. § 441a(a)(3) and 2 U.S.C. §§ 441a(a)(1)(B) and (C).
3. Enter into conciliation with Herbert F. Collins prior to a finding of probable cause to believe.
4. Find no reason to believe that the Bush-Quayle '92 Primary Committee and the Bush-Quayle '92 Compliance Committee and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. § 441a(f) in this matter.
5. Approve the attached proposed conciliation agreement and Factual and Legal Analysis, and the appropriate letters.

Lawrence M. Noble
General Counsel

3/15/95
Date

BY: Lois G. Lerner (SLB)
Lois G. Lerner
Associate General Counsel

Attachments

- A. Factual and Legal Analysis
- B. Proposed Conciliation Agreement
- C. Collins Response to Complaint
- D. Bush-Quayle Response to Complaint

95043691729



FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. ENMON/LISA R. DAVIS *L.R.D.*
COMMISSION SECRETARY

DATE: MARCH 17, 1995

SUBJECT: PRE-MUR 290/MUR 3886 - FIRST GENERAL COUNSEL'S REPORT
DATED MARCH 10, 1995.

The above-captioned document was circulated to the
Commission on MONDAY, MARCH 13, 1995 at 11:00 a.m.

Objection(s) have been received from the
Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	<u>XXX</u>	<u>FOR THE RECORD ONLY!!!</u>
Commissioner Elliott	<u> </u>	
Commissioner McDonald	<u> </u>	
Commissioner McGarry	<u>XXX</u>	
Commissioner Potter	<u> </u>	
Commissioner Thomas	<u> </u>	

This matter will be placed on the meeting agenda
for TUESDAY, MARCH 21, 1995.

Please notify us who will represent your Division before
the Commission on this matter.

95043691730

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Herbert F. Collins;) Pre-MUR 290
Bush-Quayle '92 Primary Committee,) and MUR 3886
Inc.;)
Bush-Quayle '92 Compliance)
Committee, Inc.;)
J. Stanley Huckaby, as treasurer)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on March 21, 1995, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions with respect to Pre-MUR 290 and MUR 3886:

1. Merge Pre-MUR 290 into MUR 3886, and hereinafter refer to this matter as MUR 3886.
2. Find reason to believe that Herbert F. Collins violated 2 U.S.C. § 441a(a)(3) and 2 U.S.C. §§ 441a(a)(1)(B) and (C).
3. Enter into conciliation with Herbert F. Collins prior to a finding of probable cause to believe.
4. Find no reason to believe that the Bush-Quayle '92 Primary Committee and the Bush-Quayle '92 Compliance Committee and J. Stanley Huckaby, as treasurer, violated 2 U.S.C. § 441a(f) in this matter and close the file with respect to these respondents.

(continued)

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5. Approve the proposed conciliation agreement and Factual and Legal Analysis, and the appropriate letters as recommended in the General Counsel's March 10, 1995 report.

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

Attest:

3-23-95
Date

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

95043691732



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 1995

Robert F. Bauer, Esquire
Perkins Coie
607 Fourteenth Street, N.W.
Suite 800
Washington, D.C. 20005-2011

RE: MUR 3886
Herbert F. Collins

Dear Mr. Bauer:

On January 28, 1994, the Federal Election Commission notified your client, Herbert F. Collins, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint was forwarded to your client at that time.

Upon further review of the allegations contained in the complaint and information your client supplied, the Commission, on March 21, 1995, found that there is reason to believe Herbert F. Collins violated 2 U.S.C. §§ 441a(a)(1)(B) and (C), and § 441a(a)(3), provisions of the Act. The Factual and Legal Analysis, which formed bases for the Commission's findings, is attached for your information. At the same time, the Commission determined to merge Pre-NUR 290, filed sua sponte, into MUR 3886.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

95043691733

Robert F. Bauer, Esquire
Page 2

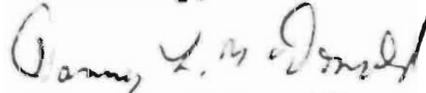
If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation, and if you agree with the provisions of the enclosed agreement, please sign and return the agreement along with the civil penalty to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

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 investigation to be made public.

If you have any questions, please contact Frances B. Hagan, the staff member assigned to this matter, at (202) 219-3400.

Sincerely,



Danny L. McDonald
Chairman

Enclosures
Factual and Legal Analysis
Conciliation Agreement

95043691734

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENT: Herbert F. Collins MUR: 3886

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities, and by a complaint filed with the Commission by the Center for Responsive Politics. See 2 U.S.C. § 437g(a)(1) and 2 U.S.C. § 437g(a)(2).

2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to \$25,000. The statute explicitly states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held. See 11 C.F.R. § 110.5(c)(2).

2 U.S.C. § 441a(a)(1)(B) limits contributions by an individual to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, to an aggregate of \$20,000 in any calendar year.

2 U.S.C. § 441a(a)(1)(C) limits contributions by an individual to any other political committee to an aggregate of \$5,000 in a calendar year.

Complainant alleges that based on FEC records, Mr. Collins made contributions attributable to the 1992 calendar year totaling \$42,000, or \$17,000 in excess of the \$25,000 annual limit. This

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Office's review of the Commission's records and indexes revealed that Mr. Collins made the following contributions attributable to the 1992 calendar year:

<u>DATE</u>	<u>AMOUNT</u>	<u>P/G</u>	<u>COMMITTEE</u>
11/30/87	1,000	P	92 FRIENDS OF SEN. D'AMATO '92
10/20/88	500	G	92 FRIENDS OF SEN. D'AMATO '92
01/19/89	1,000	P	92 RUDMAN FOR SENATE COMMITTEE
04/10/89	500	G	92 FRIENDS OF SENATOR D'AMATO '92
09/19/89	1,000	P	92 COHEN FOR SENATOR
05/03/91	500	P	92 DEAN GALLO FOR CONGRESS COMMITTEE
07/15/91	1,000	P	92 RE-ELECT PACKWOOD COMMITTEE
07/15/91	1,000	G	92 RE-ELECT PACKWOOD COMMITTEE
10/09/91	500	P	92 COHEN FOR SENATOR
10/29/91	2,000	P	92 BUSH - QUAYLE '92 PRIMARY CMTE, INC.
11/04/91	1,000	G	92 THORNBURGH FOR SENATE COMMITTEE
12/22/91	-1,000 ¹	P	92 BUSH - QUAYLE '92 PRIMARY CMTE, INC.
02/04/92	2,000	G	92 BUSH - QUAYLE '92 COMP CMTE INC
02/05/92	1,000 ²	P	92 FRIENDS OF SENATOR DON NICKLES
03/02/92	-1,000 ³	G	92 BUSH - QUAYLE '92 COMP CMTE, INC.
03/23/92	1,000 ³	P	92 DOLE FOR SENATE '92
04/27/92	4,500	P	92 NATIONAL REPUBLICAN SEN COMMITTEE
04/27/92	4,500	P	92 NATIONAL REPUBLICAN CONG COMMITTEE
04/27/92	9,000 ⁴	P	92 PRESIDENT'S DINNER/AKA 1992 REP SEN
04/27/92	1,000	P	92 MCGRATH FOR CONGRESS COMMITTEE
05/13/92	250	P	92 DAN DALY FOR US CONGRESS COMMITTEE
05/28/92	500	P	92 BUTLER FOR CONGRESS
06/05/92	1,000	P	92 MASS REPUBLICAN STATE COMMITTEE
06/05/92	500	P	92 MASS REPUBLICAN STATE COMMITTEE
06/15/92	750	G	92 CITIZENS FOR OLYMPIA SNOWE
07/20/92	1,000	P	92 FRIENDS OF NEWT GINGRICH - 1992
07/20/92	500	P	92 MASS REPUBLICAN STATE COMMITTEE
08/04/92	1,000	G	92 FRIENDS OF SENATOR DON NICKLES
08/04/92	2,000 ⁵	P	92 MASS REPUBLICAN STATE COMMITTEE
08/04/92	1,000 ⁵	P	92 MASS REPUBLICAN STATE COMMITTEE
10/16/92	15,000 ⁶	P	92 REPUBLICAN NATIONAL COMMITTEE - RNC

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1. Timely reattribution made within 60 days of the committee's receipt as required by 11 C.F.R. § 103.3(b).
2. Timely reattribution made within 60 days of the committee's receipt as required by 11 C.F.R. § 103.3(b).
3. Contribution refunded March 8, 1994.
4. Joint fundraiser memo entry for National Republican Senatorial and National Republican Congressional Committees. Transfers of \$4,500 made to non-federal accounts of each participating committee, March 1994.
5. Five hundred dollars transferred to non-federal account on March 10, 1994.
6. RNC refunded \$7,500 to contributor on December 13, 1993.

10/19/92	1,000 ⁷	G	92	JUDD GREGG COMMITTEE
10/19/92	1,000 ⁸	G	92	DOLE FOR SENATE '92
01/25/93	<u>1,000</u> ⁸	G	92	CITIZENS FOR TORKILDSEN

1992 TOTAL: \$48,500

Responding to the complaint, Mr. Collins argues that he misunderstood the application of election laws to the individual contribution limit. As explained by counsel, during 1992 Mr. Collins made a number of contributions from a joint checking account. Respondent apparently believed the contributions on the joint account were from both himself and his wife. According to respondent's counsel, Mr. Collins was not aware at the time of the contributions of the requirement that contributions made by more than one person are to include each contributor's signature on the check or an accompanying letter. 11 C.F.R. § 110.1(k)(1) and (2).

Prompted initially by inquiries in October 1993 from the Los Angeles Times concerning an upcoming newspaper article on individuals exceeding the annual limit, respondent obtained a listing of his contributions from the FEC Public Disclosure Division and examined his 1992 contributions. As a result of Mr. Collins' review and subsequent contact with certain recipient committees, remedial actions were taken that address the excessive portion of his contributions (\$23,500).

First, on October 19, 1994, Mr. and Mrs. Collins sent letters reattributing certain 1992 (and 1993) contributions to Mrs. Collins. Then, between December 1993 and March 1994, two recipient committees refunded contributions attributable to 1992 totaling \$9,500, and another \$9,500 was transferred from the

7. Contribution refunded March 8, 1994.
8. Contribution made to retire 1992 debt.

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federal to the non-federal accounts of three party committees. The reattributions and refunds significantly reduce the 1992 contributions attributable to Mr. Collins, bringing the amount below the annual contribution limit. However, coming two years or more after the contributions were made, these remedial adjustments are not timely pursuant to 11 C.F.R. §§ 103.3(b) and 110.1(k), and do not vitiate the violation. Thus it appears that Mr. Collins made \$48,500 in contributions attributable to calendar year 1992, thereby exceeding the \$25,000 annual contribution limit by \$23,500. 2 U.S.C. § 441a(a)(3).

In addition, in 1992 Mr. Collins exceeded by \$4,000 the \$20,000 per calendar year limit on contributions to national political party committees by making aggregate contributions of \$24,000 to the President's Dinner Committee and the Republican National Committee. 2 U.S.C. § 441a(a)(1)(B). See chart above. Finally, Mr. Collins exceeded by \$5,000 the \$5,000 per calendar year limit on contributions to any political committees other than those established by a national party or authorized by a candidate by making contributions of \$10,000 to the Massachusetts Republican State Committee in 1988 (\$5,000 each on October 6 and November 1, 1988). 2 U.S.C. § 441a(a)(1)(C).

Therefore, there is reason to believe that Herbert F. Collins violated 2 U.S.C. § 441a(a)(3) and 2 U.S.C. §§ 441a(a)(1)(B) and (C).

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 29, 1995

J. Stanley Huckaby, Treasurer
Bush-Quayle '92 Primary Committee, Inc.
Bush-Quayle '92 Compliance Committee, Inc.
P. O. Box 18998
Washington, D.C. 20036

RE: MUR 3886
Bush-Quayle '92 Primary Comm., Inc.
Bush-Quayle '92 Compliance Comm., Inc.
J. Stanley Huckaby, as treasurer

Dear Mr. Huckaby:

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

On March 21, 1995, the Commission found, on the basis of the information in the complaint and information you provided, that there is no reason to believe the Committee and you, as treasurer, violated 2 U.S.C. § 441a(f). Accordingly, the Commission closed its file in this matter as it pertains to Bush-Quayle '92 Primary Committee, Inc., the Bush-Quayle '92 Compliance Committee, Inc., and you, as treasurer.

This matter will become a part of the public record within 30 days after the file has been closed with respect to all other respondents involved. The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

95043691739

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

APR 24 5 06 PM '95

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Herbert Collins

)
) MUR 3886
)
)

SENSITIVE

GENERAL COUNSEL'S REPORT

Attached is a signed conciliation agreement submitted on behalf of Herbert Collins and signed by B. Holly Schadler, counsel for Mr. Collins.¹ Attachment 1

The attached agreement

contains a civil penalty figure of \$20,000 and admissions of violations of 2 U.S.C. §§ 441a(a)(1)(B), 441a(a)(1)(C) and 441a(a)(3) by Mr. Collins. Thus, this Office recommends that the Commission accept the conciliation agreement signed by Respondents and close the file in this matter.

III. RECOMMENDATIONS

1. Accept the attached conciliation agreement with Herbert Collins.
2. Approve the appropriate letter.

1. The attached conciliation agreement contains a signature page transmitted by facsimile. Ms. Schadler represented that she has signed the original agreement and sent it to this Office by certified mail. A check for the civil penalty has not yet been received.

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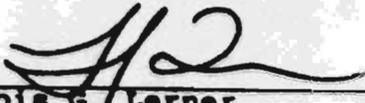
3. Close the file.

Lawrence M. Noble
General Counsel

Date

8/23/95

BY:


Lois G. Lerner
Associate General Counsel

Attachment

1. Conciliation Agreement

Staff assigned: Beth Stein

95043691/41

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Herbert Collins.

)
) MUR 3886
)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on August 30, 1995, the Commission decided by a vote of 6-0 to take the following actions in MUR 3886:

1. Accept the conciliation agreement with Herbert Collins, as recommended in the General Counsel's Report dated August 23, 1995.
2. Approve the appropriate letter, as recommended in the General Counsel's Report dated August 23, 1995.
3. Close the file.

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

Attest:

8-30-95
Date

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

Received in the Secretariat:	Thurs., Aug. 24, 1995	5:06 p.m.
Circulated to the Commission:	Fri., Aug. 25, 1995	12:00 p.m.
Deadline for vote:	Wed., Aug. 30, 1995	4:00 p.m.

bjr

95043691742



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

September 5, 1995

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

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

RE: MUR 3886

Dear Ms. Miller:

This is in reference to the complaint you filed with the Federal Election Commission on January 21, 1994, concerning a violation of 2 U.S.C. § 441a(a)(3), the \$25,000 annual contribution limit, by Herbert Collins.

The Commission found reason to believe that Herbert Collins violated 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(1)(B) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended. On August 30, 1995, a conciliation agreement signed by counsel for the respondent was accepted by the Commission. Accordingly, the Commission closed the file in this matter on August 30, 1995. A copy of this agreement is enclosed for your information.

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

Sincerely,

Elizabeth Stein

Elizabeth Stein
Attorney

Enclosure
Conciliation Agreement

95043691743



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 5, 1995

B. Holly Schadler, Esq.
Perkins Coie
607 Fourteenth St., N.W.
Washington, D.C. 20005-1690

RE: MUR 3886
Herbert Collins

Dear Ms. Schadler:

On August 30, 1995, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of violations of 2 U.S.C. §§ 441a(a)(1)(A), 441a(a)(1)(C) and 441a(a)(3), provisions of the Federal Election Campaign Act of 1971, as amended.

The confidentiality provisions at 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. It is the understanding of this Office that you intend to submit factual and legal materials to appear on the public record. Please provide these materials as soon as possible to ensure the prompt inclusion of any permissible submissions. While the file may be placed upon the public record before the receipt of these materials, permissible submissions will be added upon receipt.

Information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the civil penalty is due within 30 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-3690.

Sincerely,

Elizabeth Stein

Elizabeth Stein
Attorney

Enclosure
Conciliation Agreement

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

95043691744



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

September 5, 1995

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

RE: MUR 3886
Bush/Quayle '92 Primary Committee, Inc.
Bush/Quayle '92 Compliance Committee, Inc.
J. Stanley Huckaby, as treasurer

Dear Mr. Huckaby:

On February 15, 1994, the Federal Election Commission notified the Bush/Quayle '92 Primary Committee, Inc., Bush/Quayle '92 Compliance Committee, Inc. ("Committee") and you, as treasurer, of a complaint alleging violations of certain sections of the Federal Election Campaign Act of 1971, as amended.

On March 21, 1995, the Commission found, on the basis of the information in the complaint and information provided by you, that there is no reason to believe the Bush/Quayle '92 Primary Committee, Inc., Bush/Quayle '92 Compliance Committee and you, as treasurer violated 2 U.S.C. § 441a(f). Accordingly, the Commission closed its file in this matter as it pertains to you at that time.

This letter is to advise you that this entire matter is now closed. The confidentiality provisions at 2 U.S.C. § 437g(a)(12) no longer apply and the 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.

Celebrating the Commission's 20th Anniversary

YESTERDAY TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

95043691745

MUR 3886
J. Stanley Muckaby, Treasurer
Page 2

While the file may be placed on the public record before receiving your additional materials, any permissible submissions will be added to the public record upon receipt. If you have any questions, please contact Elizabeth Stein, the attorney assigned to this matter at (202) 219-3690.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

Enclosure
General Counsel's Report

95043691746

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Herbert F. Collins

)
) MUR 3886
)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission") pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, and by a signed, sworn, and notarized complaint by Ellen S. Miller, Executive Director of the Center for Responsive Politics. The Commission found reason to believe that Herbert F. Collins ("Respondent") violated 2 U.S.C. §§ 441a(a)(1)(B) and (C), and 441a(a)(3).

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

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

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

III. Respondent enters voluntarily into this agreement with the Commission.

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

1. Respondent Herbert F. Collins is an individual contributor to federal political committees for the 1992 elections.

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2. 2 U.S.C. § 441a(a)(3) limits total contributions by an individual in any calendar year to \$25,000. The statute explicitly states that any contribution to a candidate or authorized committee with respect to a particular election made in a non-election year shall be considered to be made during the calendar year in which such election is held. See 11 C.F.R. § 110.5(c)(2).

3. The FEC review of contributions made for the 1992 elections revealed that respondent made contributions totaling \$48,500, or \$23,500 in excess of the annual limit.

4. Respondent contends that some of the contributions made from joint checking accounts were intended to be attributed to him and his wife. However, there was no spousal signature along with Respondent's on the contribution checks as required at 11 C.F.R. § 110.1(k).

5. Respondent contends he was unaware his contributions may have violated the law until contacted by a news reporter in October 1993. Thereafter, on October 19, 1993, he took steps to remedy the violations by sending letters to the candidates and committees notifying them to attribute contributions equally between his wife and himself. Between December 1993 and March 1994, Respondent also obtained two refunds totaling \$9,500 and received confirmation that another \$9,500 in contributions was transferred from federal to non-federal accounts of three party committees. While these remedial adjustments brought the contributions within the annual contribution limit, they were not timely pursuant to 11 C.F.R. §§ 103.3(b) and 110.1(k).

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6. 2 U.S.C. § 441a(a)(1)(B) limits contributions by an individual to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, to an aggregate of \$20,000 in any calendar year.

7. In 1992, Respondent made aggregate contributions totaling \$24,000 to two national party committees. Of this amount, \$7,500 was reattributed to Respondent's spouse on October 19, 1993, and \$7,500 was refunded to Respondent on December 13, 1993. While these remedial adjustments brought the contributions within the annual contribution limit, they were not timely pursuant to 11 C.F.R. §§ 103.3(b) and 110.1(k).

8. 2 U.S.C. § 441a(a)(1)(C) limits contributions by an individual to any other political committee to an aggregate of \$5,000 in a calendar year.

9. Respondent made a contribution of \$10,000 to the Massachusetts Republican State Committee in 1988. Respondent included the names of both himself and his wife on the memo line of the check but did not include a spousal signature on the check.

V. 1. Respondent made contributions totaling \$48,500, or \$23,500 in excess of the annual contribution limits for 1992 in violation of 2 U.S.C. § 441a(a)(3).

2. Respondent made excessive contributions to the political committees established and maintained by a national political party, which are not the authorized political committees of any candidate, in violation of 2 U.S.C. § 441a(a)(1)(B).

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3. Respondent made excessive contributions to a political committee other than those established by a national party or authorized by a candidate in violation of 2 U.S.C. § 441a(a)(1)(C).

VI. Respondent will pay a civil penalty to the Federal Election Commission in the amount of twenty thousand dollars (\$20,000), pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

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

IX. Respondent shall have no more than 30 days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

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

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:


Lois G. Lerner
Associate General Counsel

Date 9/1/95

FOR THE RESPONDENT:


(Name) Holly Schradler
(Position) Counsel to Respondent

Date 8/22/95

95043691751

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. WASHINGTON, D.C. 20005-2011
TELEPHONE: (202) 628-6600 FACSIMILE (202) 434-1690

September 5, 1995

Ms. Elizabeth Stein
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Sixth Floor
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

SEP 5 12 44 PM '95

Re: MUR 3886

Dear Ms. Stein:

This case stems from misunderstandings of the application of federal law to individual contributions. Mr. Collins had neither the intention nor the understanding that he had exceeded the contribution limits in any of his political giving. These misunderstandings were not a result of inattention or indifference, but rather caused by confusion on the part of Mr. Collins and several of the recipient committees over the steps required to ensure that contributions made from a joint checking account were properly attributed.

Mr. Collins made a series of contributions during 1992 on a joint checking account. He believed that these contributions would be attributed to both him and his wife. Indeed, in many instances, the contributions were made in connection with fundraising events that both he and his wife attended. Mr. Collins was not aware at the time that in order for the contributions to be attributed equally to him and his wife, that both of their signatures were required on the check or an accompanying letter. The recipient committees did not inform him of this requirement.¹

¹The Conciliation Agreement also notes that Mr. Collins made a contribution of \$10,000 to the Massachusetts Republican State Committee in 1988. Mr. Collins, on the instructions of a Party representative, specifically printed on the face of the check that this contribution should be attributed to both him and his wife in equal amounts. See attached check. The Party did not act according to these instructions. Indeed the Party reported the contribution as two \$5,000 contributions from Mr. Collins made on two separate days - October 6 and November 1.

95043691752

Ms. Elizabeth Stein
Office of the General Counsel
September 5, 1995
Page 2

Immediately upon becoming aware that these contributions may have caused him to exceed a federal annual contribution limitation, as well as other limits applicable to national political parties, he took remedial steps which brought him under the annual contribution limitation. He took these remedial steps several months before the Commission notified him that a complaint had been filed regarding his contributions. While these efforts may not have been made within sixty days of the original date of the contribution, they were made promptly after he was first made aware that there was any issue at all surrounding his political giving in 1992.

Any violations of the federal limitations arose out of a misunderstanding of the attribution rules and inappropriate attribution by the recipient committees. Mr. Collins took immediate steps to correct the situation.

We request that this letter be placed on the public record along with the file in this matter.

Sincerely,



B. Holly Schadler
Counsel to Respondent

95043691753



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3886

DATE FILMED 9-28-95 CAMERA NO. 1

CAMERAMAN JMN

95043691754



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date: 10/4/95

Microfilm
 Public Records
 Press

THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED NUR 3886

25043692200

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. WASHINGTON, D.C. 20005-2011
TELEPHONE: (202) 628-6600 FACSIMILE: (202) 434-1690

September 5, 1995

Ms. Elizabeth Stein
Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Sixth Floor
Washington, D.C. 20463

SEP 5 12 44 PM '95

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Re: MUR 3886

Dear Ms. Stein:

This case stems from misunderstandings of the application of federal law to individual contributions. Mr. Collins had neither the intention nor the understanding that he had exceeded the contribution limits in any of his political giving. These misunderstandings were not a result of inattention or indifference, but rather caused by confusion on the part of Mr. Collins and several of the recipient committees over the steps required to ensure that contributions made from a joint checking account were properly attributed.

Mr. Collins made a series of contributions during 1992 on a joint checking account. He believed that these contributions would be attributed to both him and his wife. Indeed, in many instances, the contributions were made in connection with fundraising events that both he and his wife attended. Mr. Collins was not aware at the time that in order for the contributions to be attributed equally to him and his wife, that both of their signatures were required on the check or an accompanying letter. The recipient committees did not inform him of this requirement.¹

¹The Conciliation Agreement also notes that Mr. Collins made a contribution of \$10,000 to the Massachusetts Republican State Committee in 1988. Mr. Collins, on the instructions of a Party representative, specifically printed on the face of the check that this contribution should be attributed to both him and his wife in equal amounts. See attached check. The Party did not act according to these instructions. Indeed the Party reported the contribution as two \$5,000 contributions from Mr. Collins made on two separate days - October 6 and November 1.

95043692261

Ms. Elizabeth Stein
Office of the General Counsel
September 5, 1995
Page 2

Immediately upon becoming aware that these contributions may have caused him to exceed a federal annual contribution limitation, as well as other limits applicable to national political parties, he took remedial steps which brought him under the annual contribution limitation. He took these remedial steps several months before the Commission notified him that a complaint had been filed regarding his contributions. While these efforts may not have been made within sixty days of the original date of the contribution, they were made promptly after he was first made aware that there was any issue at all surrounding his political giving in 1992.

Any violations of the federal limitations arose out of a misunderstanding of the attribution rules and inappropriate attribution by the recipient committees. Mr. Collins took immediate steps to correct the situation.

We request that this letter be placed on the public record along with the file in this matter.

Sincerely,



B. Holly Schadler
Counsel to Respondent

9 5 0 4 3 6 9 2 2 6 3

002

HERBERT F. COLLINS
SHEILA S. COLLINS
EDGEMOOR ROAD
ROCHESTER, MA 01800

NO 144

OCT. 27 1988

9-707/118

OLYMPIC INTERNATIONAL

OLYMPIC INTERNATIONAL

\$ 10,000.00

NOV-2-88

DOLLARS

OLYMPIC INTERNATIONAL
BANKING COMPANY

INSURED MONEY MARKET ACCOUNT

30 Congress Street, Boston, MA 02201
H. S. COLLINS 1014-22-3066
S. S. COLLINS 1032-24-8332

Herbert Collins

0144 700010000000

6

03/22/95 17:06

PERKINS COIE

A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS
607 FOURTEENTH STREET, N.W. · WASHINGTON, D.C. 20005-2011
TELEPHONE: (202) 628-6600 · FACSIMILE: (202) 434-1690

September 28, 1995

VIA MESSENGER

Ms. Beth Stein
Federal Election Commission
Office of the General Counsel
999 E Street, NW
6th Floor
Washington, DC 20463

Re: MUR 3886

Dear Ms. Stein:

Enclosed you will find the check in the amount of \$20,000 in full payment of the civil penalty in MUR 3886.

Sincerely,



B. Holly Schadler

Enclosure

BHS:jic

cc: Herbert F. Collins

95043692264

9 5 0 4 3 6 9 2 2 5 5

INVOICE		OUR REF. NUMBER	GROSS AMOUNT	DISCOUNT	NET AMOUNT
NUMBER	DATE				
CONTRIB	09/26/95	000987	20000.00	0.00	20000.00

HERBERT F. COLLINS
 313 CONGRESS STREET
 BOSTON, MA 02210

VENDOR
 FEC

TOTAL

20000.00

0.00

20000.00

HERBERT F. COLLINS
 313 CONGRESS STREET
 BOSTON, MA 02210

CHECK NUMBER
 002453

CHECK DATE
 09/26/95

BOSTON PRIVATE BANK & TRUST COMP
 BOSTON, MASS 02210

PAY

TWENTY THOUSAND AND NO/100 Dollars

*****\$20,000.00

TO THE FEDERAL ELECTION COMMITTEE
 ORDER OF


 AUTHORIZED SIGNATURE

⑈002453⑈



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
SEP 29 10 02 AM '95

September 28, 1995

TWO WAY MEMORANDUM

TO: OGC Docket
FROM: Rosa E. Swinton Accounting Technician Leslie D. Brown Disbursement Technician
SUBJECT: Account Determination for Funds Received

We recently received a check from HERBERT F. COLLINS, check number 002453, dated SEPTEMBER 26, 1995, for the amount of \$20,000.00. A copy of the check and any correspondence is being forwarded. Please indicate below which account the funds should be deposited and give the MUR/Case number and name associated with the deposit.

TO: Rosa E. Swinton Accounting Technician Leslie D. Brown Disbursement Technician
FROM: OGC Docket By aa
SUBJECT: Disposition of Funds Received

In reference to the above check in the amount of \$20,000.00 the MUR/Case number is 3886 and in the name of Herbert F. Collins. Place this deposit in the account indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Anita M Alexander
Signature

9-29-95
Date

95043692266