FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4036

DATE FILMED 3-6-95 CAMERA NO. 2

CAMERAMAN JMH

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

JUL 26 11 49 AM '94

45 Richardson Rd.
N. Chelmsford, Ma. 01863
July 11, 1994

Federal Election Commission
Washington, D.C. 20463

To Whom it May Concern,

My name is: Joseph W. Paolilli Jr.
45 Richardson Rd.
N. Chelmsford, Ma. 01863

I am writing this letter to show what I believe to be a violation of Federal Election Campaign Law section 441c
"Contributions by government contractors"

The following people represent or own, or are in charge of day to day operations of thier respective companies, all of which are Defense Contractors:

Wilson B. Tuffin	President	Nuclear Metals Inc.	
23 Arlington St.	Oct. 23,1992	$500.00	
Acton, Ma.	Mar. 12,1993	$500.00	
	Dec. 13,1993	$500.00	
	Jan. 21,1994	$500.00	
Robert E. Quinn	V.P. Sales	Nuclear Metals Inc.	
476 Sudbury St.	Oct. 23,1992	$200.00	
Marlboro, Ma.	Mar. 12,1993	$200.00	
	Dec. 13,1993	$250.00	
Dennis J. Picard	President & CEO	Raytheon Company	
1373-4 Mounument St.	Sept. 20,1993	$250.00	
Concord, Ma. 01742	Dec. 7,1993	$1,000.00	
Joanna T. Lau	President	Lau Technologies	
22 Granli Dr.	Feb. 23,1993	$1,000.00	
Andover, Ma. 01810			

There many other employees of Lau Technologies in positions such as vice president, Executive V.P., Senior Buyer, Marketing Manager, V.P. Marketing, Chief Financial Officer, and Program Manager.

All of the people holding the above positions contributed to the campaign of Martin T. Meehan Congressman Fifth Congressional District of Massachusetts.

Mr. Meehan sits on the House Armed Services Committee, Thus I believe that these contributions to Mr. Meehan's Campaign are violation

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the Federal Election Campaign Laws and request that an investigation take place.

Respectfully Submitted,
Joseph W. Paolilli Jr.

Concord
Massachusetts
Middlesex County

Personally appeared Joseph Paolilli and acknowledges the above instrument to be his voluntary act & deed.

James J. Clark
Notary Public
My Commission Expires 4/25/97.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUGUST 1, 1994

Joseph W. Paolilli Jr.
45 Richardson Road
N. Chelmsford, MA 01863

Dear Mr. Paolilli:

This is to acknowledge receipt on July 26, 1994, of your letter dated July 11, 1994. The Federal Election Campaign Act of 1971, as amended ("the Act") and Commission Regulations require that the contents of a complaint meet certain specific requirements. One of these requirements is that a complaint be sworn to and signed in the presence of a notary public and notarized. Your letter was not properly sworn to.

In order to file a legally sufficient complaint, you must swear before a notary that the contents of your complaint are true to the best of your knowledge and the notary must represent as part of the jurat that such swearing occurred. The preferred form is "Subscribed and sworn to before me on this _____ day of _____, 19__." A statement by the notary that the complaint was sworn to and subscribed before him also will be sufficient. We regret the inconvenience that these requirements may cause you, but we are not statutorily empowered to proceed with the handling of a compliance action unless all the statutory requirements are fulfilled. See 2 U.S.C. § 437g.

Enclosed is a Commission brochure entitled "Filing a Complaint." I hope this material will be helpful to you should you wish to file a legally sufficient complaint with the Commission.

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Please note that this matter will remain confidential for a 15 day period to allow you to correct the defects in your complaint. If the complaint is corrected and refiled within the 15 day period, the respondents will be so informed and provided a copy of the corrected complaint. The respondents will then have an additional 15 days to respond to the complaint on the merits. If the complaint is not corrected, the file will be closed and no additional notification will be provided to the respondents.

If you have any questions concerning this matter, please contact me at (202) 219-3410.

Sincerely,

Retha Dixon

Retha Dixon
Docket Chief

Enclosure
cc: Marty Meehan for Congress
Wilson Tuffin
Robert Quinn
Dennis Picard
Joanna Lau

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MUR 4036

45 Richardson Rd.
N. Chelmsford, Ma. 01863
July 11, 1994

Federal Election Commission
Washington, D.C. 20463

To Whom it May Concern,

My name is: Joseph W. Paolilli Jr.
45 Richardson Rd.
N. Chelmsford, Ma. 01863

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Marlboro, Ma.	Mar. 12,1993	$200.00	
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Dennis J. Picard	President & CEO	Raytheon Company	
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22 Granli Dr.	Feb. 23,1993	$1,000.00	
Andover, Ma. 01810			

There many other employees of Lau Technologies in positions such as vice president, Executive V.P., Senior Buyer, Marketing Manager, V.P. Marketing, Chief Financial Officer, and Program Manager.

All of the people holding the above positions contributed to the campaign of Martin T. Meehan Congressman Fifth Congressional District of Massachusetts.

Mr. Meehan sits on the House Armed Services Committee, Thus I believe that these contributions to Mr. Meehan's Campaign are violation

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the Federal Election Campaign Laws and request that an investigation take place.

Respectfully Submitted

Joseph W. Paolilli Jr.

" Subscribed and sworn to before me on this 11th day of August, 1994."

MY COMMISSION EXPIRES MARCH 28, 1995

25043630325

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUGUST 19, 1994

Joseph W. Paolilli, Jr.
45 Richardson Road
N. Chelmsford, MA 01863

RE: MUR 4036

Dear Mr. Paolilli:

This letter acknowledges receipt on August 12, 1994, of your complaint alleging possible violations of the Federal Election Campaign Act of 1971, as amended ("the Act"). The respondent(s) 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 4036. 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,

Lois G. Lerner
Associate General Counsel

Enclosure
Procedures

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUGUST 19, 1994

Mary Anastopoulos, Treasurer
Marty Meehan for Congress Committee
10 Kearney Square
Lowell, MA 01852

RE: MUR 4036

Dear Ms. Anastopoulos:

The Federal Election Commission received a complaint which indicates that the Marty Meehan for Congress Committee ("Committee") and you, as treasurer, may have violated the Federal Election Campaign Act of 1971, as amended ("the Act"). A copy of the complaint is enclosed. We have numbered this matter MUR 4036. Please refer to this number in all future correspondence.

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

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

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

Sincerely,

Lois G. Lerner
Associate General Counsel

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

25043630328

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

AUGUST 19, 1994

Wilson B. Tuffin, President
Nuclear Metals, Inc.
23 Arlington Street
Acton, MA 01720

RE: MUR 4036

Dear Mr. Tuffin:

The Federal Election Commission received a complaint which indicates that Nuclear Metals, Inc. and 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 4036. 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 Nuclear Metals, Inc. and you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

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

Sincerely,

Lois G. Lerner
Associate General Counsel

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

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

AUGUST 19,1994

Robert E. Quinn, Vice President
Nuclear Metals, Inc.
476 Sudbury Street
Marlboro, MA 01752

RE: MUR 4036

Dear Mr. Quinn:

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 4036. 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.

25043630331

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

Sincerely,

Lois G. Lerner
Associate General Counsel

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

AUGUST 19, 1994

Dennis J. Picard, President and CEO
Raytheon Company
1373-4 Mounument Street
Concord, MA 01742

RE: MUR 4036

Dear Mr. Picard:

The Federal Election Commission received a complaint which indicates that the Raytheon Company and 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 4036. 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 Raytheon Company and you in this matter. Please submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Where appropriate, statements should be submitted under oath. Your response, which should be addressed to the General Counsel's Office, must be submitted within 15 days of receipt of this letter. If no response is received within 15 days, the Commission may take further action based on the available information.

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

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

Sincerely,

Lois G. Lerner
Associate General Counsel

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

2504363034

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

AUGUST 19, 1994

Joanna T. Lau, President
Lau Technologies
22 Granli Drive
Andover, MA 01810

RE: MUR 4036

Dear Ms. Lau:

The Federal Election Commission received a complaint which indicates that Lau Technologies and 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 4036. 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 Lau Technologies and 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.

25043630335

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

Sincerely,

Lois G. Lerner
Associate General Counsel

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

25043630336

Dennis J. Picard
Chairman and
Chief Executive Officer

Raytheon Company
1[illegible]ning Street
L[illegible]gton MA 02173
617 860 2032

Raytheon

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMINISTRATION

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RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

August 16, 1994

(MUR 4036)

Ms. Retha Dixon
Docket Chief
Federal Election Commission
Washington, D.C. 20463

Dear Ms. Dixon:

Thank you for providing me with a copy of your letter of August 1 to Joseph W. Paolilli, Jr., of Chelmsford, Massachusetts. Mr. Paolilli had written to the Commission on July 11 alleging that certain contributions made by me (and by others) to the campaign of Martin T. Meehan violated the prohibition against contributions by government contractors contained in 2 U.S.C. §441c. Your August 1 letter advised Mr. Paolilli that his July 11 letter was procedurally defective as a complaint.

Although I realize that no formal response is required, I would like to bring the following points to the Commission's attention.

- I am not a "federal contractor" as that term is defined in 11 CFR §115.1. I am Chairman and Chief Executive Officer of Raytheon Company. Raytheon Company is a "federal contractor." However, my position with the company does not make me a "federal contractor."

- I am a long-time resident of the Fifth Congressional District in Massachusetts and, as such, am a constituent of Congressman Meehan. It is, of course, entirely proper for me to make contributions to the campaign of my Congressman.

- All contributions to Congressman Meehan's campaign were made by personal check, drawn on general funds in my personal checking account, and were not refunded to me or reimbursed in any manner by Raytheon Company.

I would be happy to provide copies of the canceled checks or an affidavit verifying the above facts, if either would be helpful. Thank you for giving me the opportunity to respond to these allegations. If you require any further information, please contact me.

Sincerely,

Dennis J. Picard

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FINNEGAN AND STANZLER, P.C.
ATTORNEYS AT LAW
THE CLAFLIN BUILDING
TWENTY BEACON STREET
BOSTON, MASSACHUSETTS 02108
(617) 523-2500

RECEIVED
FEDERAL ELECTION
COMMISSION
ADMIN
AUG 29 9 08 AM '94

FAX (617) 523-2502

August 25, 1994

VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Federal Election Commission
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
AUG 29 3 20 PM '94

Attention: Lois G. Lerner, Esquire
Associate General Counsel

RE: MUR 4036

Dear Attorney Lerner:

We are counsel to Lau Acquisition Corp. d/b/a Lau Technologies ("Lau Technologies" or the "Company"), as well as Ms. Joanna T. Lau. Our clients have asked us to respond to your letter of August 19, 1994, enclosing the complaint of Mr. Joseph W. Paolilli, Jr., dated July 11, 1994 (the "Complaint"). We have enclosed a duly executed Statement of Designation of Counsel authorizing us to undertake their representation in this matter.

In response to the Complaint, Lau Technologies and Ms. Joanna Lau, as named respondents, deny that they have at any time, collectively or individually, acted in violation of Federal Election Campaign Law, Section 441c, as is alleged in the Complaint. In further answer to the Complaint, Ms. Lau and the Company wish to bring to your attention the following.

Although Ms. Joanna T. Lau made a contribution of $1,000.00 to the campaign of Martin T. Meehan, Congressman of the Fifth Congressional District of Massachusetts, in February of 1993, this contribution was made from her personal assets. She was not reimbursed or compensated by Lau Technologies in any fashion for this contribution. Furthermore, this contribution was made by Ms. Lau voluntarily, e.g., it was in no way solicited or coerced by Lau Technologies or any of its agents, shareholders or officers. Accordingly, we respectfully submit that no further action be taken against Lau Technologies or Ms. Lau in this matter.

In closing, we also wish to note that our client has sought our counsel on a number of occasions so that their personal activities would not cause them, or the Company for that matter, to violate the Federal Election Laws.

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Please feel free to contact if you should wish to discuss this matter further.

Very truly yours,

Charles J. Johnson

cc: Ms. Joanna T. Lau

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STATEMENT OF DESIGNATION OF COUNSEL

MUR 4036

NAME OF COUNSEL: Charles J. Johnson, Esquire

ADDRESS: Finnegan and Stanzler, P.C.
20 Beacon Street
Boston, Massachusetts 02108

TELEPHONE: (617) 523-2500

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
AUG 29 3 20 PM '94

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.

08/24/94
Date

Joanna Lau
Signature

RESPONDENT'S NAME: Lau Technologies

ADDRESS: 531 Main Street
Acton, Massachusetts 01720

TELEPHONE: HOME( ) N/A
BUSINESS(508) 263-8365

RESPONDENT'S NAME: Joanna T. Lau

ADDRESS: 22 Granli Drive
Andover, Massachusetts 01810

TELEPHONE: HOME: (508) 475-7554
WORK: (508) 263-8365

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 18, 1994

MEMORANDUM

TO: Lawrence M. Noble
General Counsel

THROUGH: Lois G. Lerner
Associate General Counsel

FROM: Mary L. Taksar
Attorney

SUBJECT: Recusal in MUR 4036

This memorandum is to inform you that I believe it is appropriate for me to be recused from MUR 4036, a matter in which this Office just received a complaint. Raytheon is a respondent in this matter. Because I am a close friend of a Raytheon employee, who holds a position of significant responsibility in Washington D.C., I believe it would be best if I recused myself from this matter.

Alva Smith and Joan McEnery will be responding to questions and handling this matter. Joan and Alva will deal with Lois if they have any questions or need assistance. The copy of the file which is normally maintained in my office has been given to Joan and Alva. Docket will route all copies of correspondence which I would normally receive directly to Joan and Alva.

cc: Kim L. Bright-Coleman

approved

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Dennis J. Picard
Chairman and
Chief Executive Officer

Raytheon Company
141 Spring Street
Lexington MA 02173
617 860 2032

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

Raytheon

SEP 1 12 05 PM '94

August 25, 1994

Lois G. Lerner
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 4036

Dear Ms. Lerner:

I am responding to your letter of August 19, regarding the complaint of Joseph W. Paolilli, Jr., of Chelmsford, Massachusetts. Mr. Paolilli had written to the Commission on July 11 alleging that certain contributions made by me (and by others) to the campaign of Martin T. Meehan violated the prohibition against contributions by government contractors contained in 2 U.S.C. §441c.

Mr. Paolilli was initially advised by the FEC that his July 11 letter was procedurally defective as a complaint. However, he has now apparently submitted a letter which complies with the procedural requirements.

I informally responded to Mr. Paolilli's July 11 letter in a letter to Ms. Retha Dixon, Docket Chief of the Commission. However, I would now like to respond formally and under oath.

- I am not a "federal contractor" as that term is defined in 11 CFR §115.1. I am Chairman and Chief Executive Officer of Raytheon Company. Raytheon Company is a "federal contractor." However, my position with the company does not make me a "federal contractor."

- I am a long-time resident of the Fifth Congressional District in Massachusetts and, as such, am a constituent of Congressman Meehan. It is, of course, entirely proper for me to make contributions to the campaign of my Congressman.

- All contributions to Congressman Meehan's campaign were made by personal check, drawn on general funds in my personal checking account, and were not refunded to me or reimbursed in any manner by Raytheon Company.

I have designated Thomas D. Hyde as my counsel in this matter, and the *Statement of Designation of Counsel* is attached. I would be happy to provide copies of the canceled checks evidencing the contributions if they would be helpful. If you require any further information or documentation, please contact Mr. Hyde.

The foregoing statements are true, accurate and correct to the best of my knowledge and belief.

Dennis J. Picard

Dennis J. Picard

* * * * *

Commonwealth of Massachusetts
County of Middlesex

Subscribed and sworn to before me, a notary public, this 25th day of August, 1994.

My commission expires: January 13, 1995

STATEMENT OF DESIGNATION OF COUNSEL

MUR 4036

NAME OF COUNSEL: Thomas D. Hyde, Vice President General Counsel

ADDRESS: Raytheon Company
141 Spring Street
Lexington, MA 02173

TELEPHONE: (617) 860-2681

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

8/25/94
Date

Signature
D. J. Picard

RESPONDENT'S NAME: Dennis J. Picard

ADDRESS: Raytheon Company
141 Spring Street
Lexington, MA 02173

TELEPHONE: HOME( )

BUSINESS(617) 860-2035

>5043630344

★ CONGRESSMAN ★

MARTY MEEHAN

September 1, 1994

Lois G. Lerner
Associate General Counsel
Office of the General Counsel
Central Enforcement
Federal Election Commission
Washington, DC 20463

RE: MUR4036

Dear Attorney Lerner,

In response to the above referenced complaint filed by an opposing candidate's representative the Marty Meehan for Congress Committee (the "Committee") respectfully answers this matter under review as follows:

1. None of the four people named are disqualified from contributing to the Committee.

2. None of the four people named are sole proprietors of an entity that is under contract with the United States.

3. Each of the people made contributions in an individual capacity and not in the name of an entity under contract with the United States.

4. The Commission has held that officers and employees of any type of corporation, even if the corporation does business with the United States, may contribute to candidates for office under the United States. Advisory Opinion 1975-31. The businesses that the persons named are associated with, are all corporations.

75 PRINCETON STREET, NO. CHELMSFORD, MASSACHUSETTS 01863 TEL. 508/251-8804

PAID FOR BY THE MARTY MEEHAN FOR CONGRESS COMMITTEE

For the foregoing reasons the Committee and the Treasurer of the Committee respectfully suggest that the complaint is politically motivated, is without merit and that no action is warranted on the matter.

Sincerely,

Francis T. Talty
Assistant Treasurer
Marty Meehan for Congress Committee

>50486430346

PEABODY & ARNOLD
COUNSELLORS AT LAW
50 ROWES WHARF
BOSTON, MASSACHUSETTS 02110-3342
TELEPHONE (617) 951-2100
FAX (617) 951-2125

DIRECT DIAL NUMBER

ONE CITIZENS PLAZA, 8TH FL.
PROVIDENCE, RHODE ISLAND 02903
TELEPHONE (401) 831-8330
FAX (401) 831-8359

September 12, 1994

Lois G. Lerner, Esquire
Associate General Counsel
Federal Election Commission
Washington, DC 20463

SEP 15 12 13 PM '94

Re: MUR4036

Dear Ms. Lerner:

I am writing in response to the complaint set forth in the above-referenced matters. I enclose designations of counsel signed by Mr. Quinn and Mr. Tuffin.

I am puzzled as to why the Federal Election Commission instituted a proceeding, as the purported complaint does not allege a violation of law. Nothing in the statute that I am aware of prohibits contributions by employees of government contractors. To the extent that there is any ambiguity in the statute, it is resolved by the regulations. Section 115.6 of 11 CFR provides, in part:

> Nothing in this part shall prohibit the stockholders, officers, or employees of a corporation ... which is a Federal contractor from making contributions or expenditures from their personal assets.

I hope that this letter has responded fully to your concerns.

Sincerely yours,

Thomas A. Wooters

TAW:cy
Enclosures
cc: Wilson B. Tuffin
George J. Matthews
PABOS:TAW:107058_1

2504363047

MUR 4036

NAME OF COUNSEL: Thomas A. Wooters

ADDRESS: Peabody & Arnold
50 Rowes Wharf
Boston, MA 02110

TELEPHONE: (617) 951-2100

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

August 29, 1994
Date

Wilson B. Tuffin
Signature

RESPONDENT'S NAME: Wilson B. Tuffin

ADDRESS: 23 Arlington Street
Acton, MA 01720

TELEPHONE: HOME( )

BUSINESS(508) 369-5410

>5043630348

MUR 4036

NAME OF COUNSEL: Thomas A. Wooters

ADDRESS: Peabody & Arnold
50 Rowes Wharf
Boston, MA 02110

TELEPHONE: (617) 951-2100

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

August 29, 1994
Date

Signature

RESPONDENT'S NAME: Robert E. Quinn

ADDRESS: 476 Sudbury Street
Marlboro, MA 01752

TELEPHONE: HOME( )

BUSINESS(508) 369-5410

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§ 115.5 Individuals and sole proprietors.

Individuals or sole proprietors who are Federal contractors are prohibited from making contributions or expenditures from their business, personal, or other funds under their dominion or control. The spouse of an individual or sole proprietor who is a Federal contractor is not prohibited from making a personal contribution or expenditure in his or her name.

§ 115.6 Employee contributions or expenditures.

Nothing in this part shall prohibit the stockholders, officers, or employees of a corporation, the employees, officers, or members of an unincorporated association, cooperative, membership organization, labor organization, or other group or organization which is a Federal contractor from making contributions or expenditures from their personal assets.

PART 116—DEBTS OWED BY CANDIDATES AND POLITICAL COMMITTEES

Sec.
116.1 Definitions.
116.2 Debts owed by terminating committees, ongoing committees, and authorized committees.
116.3 Extensions of credit by commercial vendors.
116.4 Forgiveness or settlement of debts owed to commercial vendors.
116.5 Advances by committee staff and other individuals.
116.6 Salary payments owed to employees.
116.7 Debt settlement plans filed by terminating committees; Commission review.
116.8 Creditor forgiveness of debts owed by ongoing committees; Commission review.
116.9 Creditors that cannot be found or that are out of business.
116.10 Disputed debts.

AUTHORITY: 2 U.S.C. 433(d), 434(b)(8), 438(a)(8), 441a, 441b, and 451.

SOURCE: 55 FR 26386, June 27, 1990, unless otherwise noted.

§ 116.1 Definitions.

(a) *Terminating committee.* For purposes of this part, *terminating committee* means any political committee that is winding down its political activities in preparation for filing a termination report, and that would be able to terminate under 11 CFR 102.3 except that it has outstanding debts or obligations. A political committee will be considered to be winding down its political activities if it has ceased to make or accept contributions and expenditures, other than contributions accepted for debt retirement purposes and expenditures representing payments of debts or obligations previously incurred or payments for the costs associated with the termination of political activity, such as the costs of complying with the post election requirements of the Act, if applicable, and other necessary administrative costs associated with winding down a campaign or winding down committee activities, including office space rental, staff salaries and office supplies.

(b) *Ongoing committee.* For purposes of this part, *ongoing committee* means any political committee that has not terminated and does not qualify as a terminating committee.

(c) *Commercial vendor.* For purposes of this part, *commercial vendor* means any persons providing goods or services to a candidate or political committee whose usual and normal business involves the sale, rental, lease or provision of those goods or services.

(d) *Disputed debt.* For purposes of this part, *disputed debt* means an actual or potential debt or obligation owed by a political committee, including an obligation arising from a written contract, promise or agreement to make an expenditure, where there is a bona fide disagreement between the creditor and the political committee as to the existence or amount of the obligation owed by the political committee.

(e) *Extension of credit.* For purposes of this part, *extension of credit* includes but is not limited to:

(1) Any agreement between the creditor and political committee that payment is not due until after the creditor provides goods or services to the political committee;

(2) Any agreement between the creditor and the political committee that the political committee will have additional time to pay the creditor beyond the previously agreed to due date;

(3) The failure of the political committee to make full payment to

creditor by a previously agreed to date.

(f) *Creditor.* For purposes of this part, *creditor* means any person or entity to whom a debt is owed.

[55 FR 26386, June 27, 1990; 55 FR 34007, Aug. 1, 1990]

§ 116.2 Debts owed by terminating committees, ongoing committees, and authorized committees.

(a) *Terminating committees.* A terminating committee may settle outstanding debts provided that the terminating committee files a debt settlement plan and the requirements of 11 CFR 116.7 are satisfied. The Commission will review each debt settlement plan filed to determine whether or not the terminating committee appears to have complied with the requirements of this part, and whether or not the proposed debt settlement plan would result in an apparent violation of the Act or the Commission's regulations.

(b) *Ongoing committees.* Ongoing committees shall not settle any outstanding debts for less than the entire amount owed, but may request a Commission determination that such debts are payable under 11 CFR 116.9, and resolve disputed debts under 11 CFR 116.10. Creditors may forgive debts owed by ongoing committees under the circumstances provided in 11 CFR 116.8.

(c) *Authorized committees.* (1) An authorized committee shall not settle outstanding debts for less than the amount owed if any other authorized committee of the same candidate has permissible funds available to pay all of the amount outstanding. Except as provided in paragraph (c) of this section, an authorized committee shall not terminate under 11 CFR 102.3 if—

(i) There are outstanding debts or obligations;

(ii) Any funds or assets available for all of the outstanding obligations owed by another authorized committee of the candidate and that other authorized committee is unable to pay such obligations.

(2) Transfers of funds may be made between a candidate's authorized commit-

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of) Enforcement Priority
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)

GENERAL COUNSEL'S MONTHLY REPORT

I. INTRODUCTION

This report is the General Counsel's Monthly Report to recommend that the Commission no longer pursue the identified lower priority and stale cases under the Enforcement Priority System.

II. CASES RECOMMENDED FOR CLOSING

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

A critical component of the Priority System is identifying those pending cases that do not warrant the further expenditure of resources. Each incoming matter is evaluated using Commission-approved criteria and cases that, based on their rating, do not warrant pursuit relative to other pending cases are placed in this category. By closing such cases, the Commission is able to use its limited resources to focus on more important cases.

Having evaluated incoming matters, this Office has identified 22 cases which do not warrant further pursuit relative to the other pending cases.[1] A short description of

1. These matters are: PM 305; MUR 3976; MUR 4023; MUR 4026; MUR 4031; MUR 4032; MUR 4036; MUR 4050; MUR 4051; MUR 4052; MUR 4055; MUR 4056; MUR 4058; MUR 4063; MUR 4068; MUR 4072; MUR 4073; MUR 4075; MUR 4078; MUR 4081; MUR 4082; and MUR 4083.

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each case and the factors leading to assignment of a relatively low priority and consequent recommendation not to pursue each case is attached to this report. See Attachments 1-22. For the Commission's convenience, the responses to the complaints for the externally-generated matters and the referral for the internally-generated matter are available in the Commission Secretary's office.

B. Stale Cases

Investigations are severely impeded and require relatively more resources when the activity and evidence are old. Consequently, the Office of General Counsel recommends that the Commission focus its efforts on cases involving more recent activity. Such efforts will also generate more impact on the current electoral process and are a more efficient allocation of our limited resources. To this end, this Office has identified 9 cases that have remained inactive and assigned to the Central Enforcement Docket for one year and which it believes do not warrant further investment of significant Commission resources.[2] Since the recommendation not to pursue the identified cases is based on staleness, this Office has not prepared separate narratives for these cases. However, for the Commission's convenience, the responses to the complaints for the externally-generated matters and the referrals for the internally-generated matters are also available in the

2. These matters are: MUR 3828; MUR 3829; RAD 93L-73; RAD 93L-75; RAD 93L-78; RAD 93L-83; RAD 93L-84; RAD 93L-88; and RAD 93L-91.

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Commission Secretary's office.

This Office recommends that the Commission exercise its prosecutorial discretion and no longer pursue the cases listed below effective February 21, 1995. By closing the cases effective February 21, 1995, CED and the Legal Review Team will respectively have the additional time necessary for preparing the closing letters and the case files for the public record for these cases.

III. RECOMMENDATIONS

A. Decline to open a MUR and close the file effective February 21, 1995 in the following matters:

1) RAD 93L-73
2) RAD 93L-75
3) RAD 93L-78
4) RAD 93L-83
5) RAD 93L-84
6) RAD 93L-88
7) RAD 93L-91

B. Decline to open a MUR, close the file effective February 21, 1995 and approve the appropriate letter in PM 305.

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C. Take no action, close the file effective February 21, 1995, and approve the appropriate letter in the following matters:

1) MUR 3828
2) MUR 3829
3) MUR 3976
4) MUR 4023
5) MUR 4026
6) MUR 4031
7) MUR 4032
8) MUR 4036
9) MUR 4050
10) MUR 4051
11) MUR 4052
12) MUR 4055
13) MUR 4056
14) MUR 4058
15) MUR 4063
16) MUR 4068
17) MUR 4072
18) MUR 4073
19) MUR 4075
20) MUR 4078
21) MUR 4081
22) MUR 4082
23) MUR 4083

2/13/95
Date

Lawrence M. Noble
General Counsel

25043630364

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Enforcement Priority)

AMENDED CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that the Commission decided by a vote of 6-0 on February 16, 1995, to take the following actions with respect to the General Counsel's February 13, 1995 report on enforcement priority:

A. Decline to open a MUR and close the file effective February 21, 1995 in the following matters:

1) RAD 93L-73
2) RAD 93L-83
3) RAD 93L-88

B. Decline to open a MUR, close the file effective February 21, 1995 and approve the appropriate letter in PM 305.

C. Take no action, close the file effective February 21, 1995, and approve the appropriate letter in the following matters:

1) MUR 3829
2) MUR 4023
3) MUR 4036

(continued)

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4) MUR 4050
5) MUR 4051
6) MUR 4052
7) MUR 4055
8) MUR 4063
9) MUR 4072
10) MUR 4073
11) MUR 4075
12) MUR 4078
13) MUR 4081
14) MUR 4082
15) MUR 3976

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

Attest:

2-21-95
Date

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

25043630366

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 27, 1995

Joseph W. Paolilli, Jr.
45 Richardson Road
N. Chelmsford, MA 01863

RE: MUR 4036

Dear Mr. Paolilli:

On August 12, 1994, the Federal Election Commission received your complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended ("the Act").

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Marty Meehan for Congress Committee and Mary Anastopoulos, as treasurer, Robert E. Quinn, Wilson B. Tuffin, Nuclear Metals, Inc., Dennis J. Picard, Raytheon Company, Joanna T. Lau and Lau Technologies. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995. This matter will become part of the public record within 30 days.

The Act allows a complainant to seek judicial review of the Commission's dismissal of this action. See 2 U.S.C. § 437g(a)(8).

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

95043630367

MUR 4036
MARTY MEEHAN FOR CONGRESS

The complainant, Joseph W. Paolilli, Jr., alleges that the Marty Meehan for Congress Committee accepted, during 1993-1994, an estimated $4,900 in contributions from the following: Wilson B. Tuffin, President of Nuclear Metals, Inc., Robert E. Quinn, Vice President of Sales for Nuclear Metals, Inc. Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company and Joanna T. Lau, President of Lau Technologies. He alleges that they all may be "government contractors."

Wilson B. Tuffin, President of Nuclear Metals, Inc. and Robert E. Quinn, Vice President of Nuclear Metals, Inc. responded by stating that nothing in the statute prohibits contributions by employees of government contractors.

Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company states that all contributions to Congressman Meehan's campaign were made by personal check. The contributions were drawn on general funds in his personal checking account, and were not refunded to him or reimbursed in any matter by Raytheon Company.

Joanna T. Lau, President of Lau Technologies, states that the contribution was made from her personal assets. She was not reimbursed or compensated by Lau Technologies in any fashion for this contribution.

In response, the Marty Meehan for Congress Committee states that all of the individuals made contributions in an individual capacity and not in the name of an entity under contract with the United States.

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

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 27, 1995

Mary Anastopoulos, Treasurer
Marty Meehan for Congress Committee
10 Kearney Square
Lowell, MA 01852

RE: MUR 4036

Dear Ms. Anastopoulos:

On August 19, 1994, the Federal Election Commission notified you of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against the Marty Meehan for Congress Committee and you, as treasurer. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995.

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

If you have any questions, please contact the Central Enforcement Docket at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

95043630359

MUR 4036
MARTY MEEHAN FOR CONGRESS

The complainant, Joseph W. Paolilli, Jr., alleges that the Marty Meehan for Congress Committee accepted, during 1993-1994, an estimated $4,900 in contributions from the following: Wilson B. Tuffin, President of Nuclear Metals, Inc., Robert E. Quinn, Vice President of Sales for Nuclear Metals, Inc. Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company and Joanna T. Lau, President of Lau Technologies. He alleges that they all may be "government contractors."

Wilson B. Tuffin, President of Nuclear Metals, Inc. and Robert E. Quinn, Vice President of Nuclear Metals, Inc. responded by stating that nothing in the statute prohibits contributions by employees of government contractors.

Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company states that all contributions to Congressman Meehan's campaign were made by personal check. The contributions were drawn on general funds in his personal checking account, and were not refunded to him or reimbursed in any matter by Raytheon Company.

Joanna T. Lau, President of Lau Technologies, states that the contribution was made from her personal assets. She was not reimbursed or compensated by Lau Technologies in any fashion for this contribution.

In response, the Marty Meehan for Congress Committee states that all of the individuals made contributions in an individual capacity and not in the name of an entity under contract with the United States.

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

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 27, 1995

Thomas A. Wooters
Peabody & Arnold
50 Rowes Wharf
Boston, MA 02110-3342

RE: MUR 4036
Robert E. Quinn,
Wilson B. Tuffin and
Nuclear Metals, Inc.

Dear Mr. Wooters:

On August 19, 1994, the Federal Election Commission notified your clients of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995.

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

If you have any questions, please contact the Central Enforcement Docket at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

95043630361

MUR 4036
MARTY MEEHAN FOR CONGRESS

The complainant, Joseph W. Paolilli, Jr., alleges that the Marty Meehan for Congress Committee accepted, during 1993-1994, an estimated $4,900 in contributions from the following: Wilson B. Tuffin, President of Nuclear Metals, Inc., Robert E. Quinn, Vice President of Sales for Nuclear Metals, Inc. Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company and Joanna T. Lau, President of Lau Technologies. He alleges that they all may be "government contractors."

Wilson B. Tuffin, President of Nuclear Metals, Inc. and Robert E. Quinn, Vice President of Nuclear Metals, Inc. responded by stating that nothing in the statute prohibits contributions by employees of government contractors.

Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company states that all contributions to Congressman Meehan's campaign were made by personal check. The contributions were drawn on general funds in his personal checking account, and were not refunded to him or reimbursed in any matter by Raytheon Company.

Joanna T. Lau, President of Lau Technologies, states that the contribution was made from her personal assets. She was not reimbursed or compensated by Lau Technologies in any fashion for this contribution.

In response, the Marty Meehan for Congress Committee states that all of the individuals made contributions in an individual capacity and not in the name of an entity under contract with the United States.

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

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 27, 1995

Thomas D. Hyde
Vice President General Counsel
Raytheon Company
141 Spring Street
Lexington, MA 02173

RE: MUR 4036
Dennis J. Picard and
Raytheon Company

Dear Mr. Hyde:

On August 19, 1994, the Federal Election Commission notified your clients of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995.

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

If you have any questions, please contact the Central Enforcement Docket at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

25043630363

MUR 4036
MARTY MEEHAN FOR CONGRESS

The complainant, Joseph W. Paolilli, Jr., alleges that the Marty Meehan for Congress Committee accepted, during 1993-1994, an estimated $4,900 in contributions from the following: Wilson B. Tuffin, President of Nuclear Metals, Inc., Robert E. Quinn, Vice President of Sales for Nuclear Metals, Inc. Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company and Joanna T. Lau, President of Lau Technologies. He alleges that they all may be "government contractors."

Wilson B. Tuffin, President of Nuclear Metals, Inc. and Robert E. Quinn, Vice President of Nuclear Metals, Inc. responded by stating that nothing in the statute prohibits contributions by employees of government contractors.

Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company states that all contributions to Congressman Meehan's campaign were made by personal check. The contributions were drawn on general funds in his personal checking account, and were not refunded to him or reimbursed in any matter by Raytheon Company.

Joanna T. Lau, President of Lau Technologies, states that the contribution was made from her personal assets. She was not reimbursed or compensated by Lau Technologies in any fashion for this contribution.

In response, the Marty Meehan for Congress Committee states that all of the individuals made contributions in an individual capacity and not in the name of an entity under contract with the United States.

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

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 27, 1995

Charles J. Johnson, Esquire
Finnegan and Stanzler, P.C.
20 Beacon Street
Boston, MA 02108

RE: MUR 4036
Joanna T. Lau and
Lau Technologies

Dear Mr. Johnson:

On August 19, 1994, the Federal Election Commission notified your clients of a complaint alleging certain violations of the Federal Election Campaign Act of 1971, as amended. A copy of the complaint was enclosed with that notification.

After considering the circumstances of this matter, the Commission has determined to exercise its prosecutorial discretion and to take no action against your clients. See attached narrative. Accordingly, the Commission closed its file in this matter on February 21, 1995.

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

If you have any questions, please contact the Central Enforcement Docket at (202) 219-3400.

Sincerely,

Mary L. Taksar

Mary L. Taksar
Attorney

Attachment
Narrative

95043630365

MUR 4036
MARTY MEEHAN FOR CONGRESS

The complainant, Joseph W. Paolilli, Jr., alleges that the Marty Meehan for Congress Committee accepted, during 1993-1994, an estimated $4,900 in contributions from the following: Wilson B. Tuffin, President of Nuclear Metals, Inc., Robert E. Quinn, Vice President of Sales for Nuclear Metals, Inc. Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company and Joanna T. Lau, President of Lau Technologies. He alleges that they all may be "government contractors."

Wilson B. Tuffin, President of Nuclear Metals, Inc. and Robert E. Quinn, Vice President of Nuclear Metals, Inc. responded by stating that nothing in the statute prohibits contributions by employees of government contractors.

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Joanna T. Lau, President of Lau Technologies, states that the contribution was made from her personal assets. She was not reimbursed or compensated by Lau Technologies in any fashion for this contribution.

In response, the Marty Meehan for Congress Committee states that all of the individuals made contributions in an individual capacity and not in the name of an entity under contract with the United States.

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

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE END OF MUR # 4036

DATE FILMED 3-6-95 CAMERA NO. 2

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Date: 3/14/95

✓ Microfilm

_____ Public Records

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THE ATTACHED MATERIAL IS BEING ADDED TO CLOSED MUR 4036

95043331700

Taksar

Christoph L. Hoffmann
Senior Vice President
Law, Human Resources
and Corporate Administration,
and Secretary

Raytheon Company
141 Spring Street
Lexington MA 02173

617 860 2791

Raytheon

March 7, 1995
95-57H

Mary L. Taksar, Esq.
Federal Election Commission
999 E Street, N. W.
Washington, D. C. 20463

Dear Ms. Taskar:

Re: MUR 4036
Dennis J. Picard and Raytheon Company

I am in receipt of your letter dated February 27, 1995 advising that the Commission has decided to take no action against Mr. Picard and Raytheon Company in connection with the referenced matter. Your letter also indicates that we may submit additional materials to supplement the file for the public record.

Accordingly, on behalf of Mr. Picard and Raytheon Company, please accept the attached statement for inclusion in the public record.

Sincerely,

CLHoffmann

CLH:lap

Enclosure

ATTACHMENT

Supplemental Submission of Dennis J. Picard and Raytheon Company
MUR 4036

Raytheon Company made no contributions to the Marty Meehan for Congress Committee. All contributions to the Marty Meehan for Congress Committee by Dennis J. Picard, Chairman and Chief Executive Officer of Raytheon Company, were made by Mr. Picard in his individual capacity and as a resident of Congressman Meehan's district. None of Mr. Picard's contributions violated the Federal Election Campaign Act of 1971, as amended.

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