FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 4072

DATE FILMED 3-7-85 CAMERA NO. 2

CAMERAMAN JM#

9504363102 1

Paul S. Geary
103 Central St, Apt 3R
Lowell, MA 01852

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
94 AUG 15 12 08 PM

8/3/94

Lawrence M. Noble
Federal Election Commission
Office of the General Counsel
999 E. St., NW
Washington, DC 20463

Dear Mr. Noble,

I am writing to you to formally file a grievance against the Jeghelian for Senate Committee, FEC ID# C00285403. I contacted the main number at the FEC and was instructed that the proper way to do this was to write to your office explaining my allegation.

On December 17, 1993, I agreed in principle to become the Research Director of the campaign. I agreed that for a certain period of time that I would work on a volunteer basis, and then would transfer to paid staff. This agreement was made by the campaign manager, Gene Hartigan. I informed the campaign that I would like weekly payments of $300 to begin the week of January 24th as a condition of my continuing work for the campaign. Gene Hartigan informed me that would be the case from then on.

As of January 31 I had not received a check, and placed a call to Haig Jeghelian, the campaign treasurer. He informed me that he was under the impression that I would be working gratis. I explained to him that up until the 21st of January that I had, but that I was now on paid staff, as per my discussion with Gene Hartigan regarding the subject. Jeghelian stated that he would have to discuss with the campaign manager his decisions, and I took this to mean that he did not approve of my hiring.

However, I heard no more about it, and did in fact receive a check for $300 on February 1st. I received subsequent $300 checks on the 18th and 25th of February, a $600 check on the 21st of March, $400 on the 28th of March, followed by 3 $300 checks in April and

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one $100 check on May 16. This can be seen in the April and July reports.

The candidate did not receive the vote of 15% of the Republican convention delegates required by Massachusetts state law to be placed on the primary ballot, and so the campaign ended on May 14th. The period of January 24 to May 14 constitutes 16 weeks, which means that the campaign should have paid me $4800. However, I was paid only $2900, which means that the Jeghelian for Senate committee owes me $1900.

The campaign did not acknowledge this on the July 15 report of receipts and disbursements. In schedule D, for itemization of debts and obligations owed by the committee, there are over $158,000 in itemized debts listed, mine not among them.

In an attempt to retrieve the debt owed to me, I called Haig Jeghelian following the convention to demand a payment because the campaign's unwillingness to pay my salary promptly had put me into financial duress. He informed me that he had no intention of paying me anything. I assumed that the sting of losing may still have afflicted him, and so I waited until the financial statement which was due on the 15th of July was made public in the hopes that in the ensuing month he would have calmed down and acknowledged the debt. This is not the case.

My understanding of the law is that it is the duty of the treasurer of the campaign to keep accurate records for the campaign. Haig Jeghelian acknowledged to me over the phone that Gene Hartigan and I agreed to my salary. He apparently did not agree with my hiring. However, that does not absolve him of the obligation to record this legitimate debt owed to me by the campaign. It seems to me that if he has the power to determine which debts of the campaign are legitimate and payable, then he also had the power not to pay me when he did. However, he did in fact write nine checks to me, which seems to give at least tacit consent to my employment with the campaign.

Given this, I am demanding that the Jeghelian for Senate campaign acknowledge the $1900 debt. I know that the campaign has begun debt-retirement activities, and I further demand that I receive my share of any money raised in accordance with FEC guidelines regarding committee obligations. Thank you for your

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attention to this matter, and please feel free to write or call me if you need any further information. Also please note my new address on the letterhead; I have moved recently which is why the information is different from that reported on the July 15 disclosure forms.

Sincerely,

Paul Geary

Notary Public
Angela Crupa
My Comm.
Exp: 10-14-99

cc: Haig Jeghelian
Janet Jeghelian

2504363102 4

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

September 19, 1994

Paul S. Geary
103 Central St. Apt 3R
Lowell, MA 01852

Dear Mr. Geary:

This is to acknowledge receipt of your letter dated August 3, 1994. As we previously notified you on August 8, 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. Your most recent letter does not meet these requirements. Although your letter was signed in the presence of a notary public and notarized, it was not sworn to, as required.

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 her also will be sufficient.

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.

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

Sincerely,

Retha Dixon

Retha Dixon
Docket Chief

cc: Jeghelian for Senate Committee

9504363 1026

Paul S. Geary
103 Central St, Apt 3R
Lowell, MA 01852

RECEIVED FEDERAL ELECTION COMMISSION OFFICE OF GENERAL COUNSEL
SEP 30 9 33 AM '94

8/3/94

MUR 4072

Lawrence M. Noble
Federal Election Commission
Office of the General Counsel
999 E. St., NW
Washington, DC 20463

Dear Mr. Noble,

I am writing to you to formally file a grievance against the Jeghelian for Senate Committee, FEC ID# C00285403. I contacted the main number at the FEC and was instructed that the proper way to do this was to write to your office explaining my allegation.

On December 17, 1993, I agreed in principle to become the Research Director of the campaign. I agreed that for a certain period of time that I would work on a volunteer basis, and then would transfer to paid staff. This agreement was made by the campaign manager, Gene Hartigan. I informed the campaign that I would like weekly payments of $300 to begin the week of January 24th as a condition of my continuing work for the campaign. Gene Hartigan informed me that would be the case from then on.

As of January 31 I had not received a check, and placed a call to Haig Jeghelian, the campaign treasurer. He informed me that he was under the impression that I would be working gratis. I explained to him that up until the 21st of January that I had, but that I was now on paid staff, as per my discussion with Gene Hartigan regarding the subject. Jeghelian stated that he would have to discuss with the campaign manager his decisions, and I took this to mean that he did not approve of my hiring.

However, I heard no more about it, and did in fact receive a check for $300 on February 1st. I received subsequent $300 checks on the 18th and 25th of February, a $600 check on the 21st of March, $400 on the 28th of March, followed by 3 $300 checks in April and

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one $100 check on May 16. This can be seen in the April and July reports.

The candidate did not receive the vote of 15% of the Republican convention delegates required by Massachusetts state law to be placed on the primary ballot, and so the campaign ended on May 14th. The period of January 24 to May 14 constitutes 16 weeks, which means that the campaign should have paid me $4800. However, I was paid only $2900, which means that the Jeghelian for Senate committee owes me $1900.

The campaign did not acknowledge this on the July 15 report of receipts and disbursements. In schedule D, for itemization of debts and obligations owed by the committee, there are over $158,000 in itemized debts listed, mine not among them.

In an attempt to retrieve the debt owed to me, I called Haig Jeghelian following the convention to demand a payment because the campaign's unwillingness to pay my salary promptly had put me into financial duress. He informed me that he had no intention of paying me anything. I assumed that the sting of losing may still have afflicted him, and so I waited until the financial statement which was due on the 15th of July was made public in the hopes that in the ensuing month he would have calmed down and acknowledged the debt. This is not the case.

My understanding of the law is that it is the duty of the treasurer of the campaign to keep accurate records for the campaign. Haig Jeghelian acknowledged to me over the phone that Gene Hartigan and I agreed to my salary. He apparently did not agree with my hiring. However, that does not absolve him of the obligation to record this legitimate debt owed to me by the campaign. It seems to me that if he has the power to determine which debts of the campaign are legitimate and payable, then he also had the power not to pay me when he did. However, he did in fact write nine checks to me, which seems to give at least tacit consent to my employment with the campaign.

Given this, I am demanding that the Jeghelian for Senate campaign acknowledge the $1900 debt. I know that the campaign has begun debt-retirement activities, and I further demand that I receive my share of any money raised in accordance with FEC guidelines regarding committee obligations. Thank you for your

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attention to this matter, and please feel free to write or call me if you need any further information. Also please note my new address on the letterhead; I have moved recently which is why the information is different from that reported on the July 15 disclosure forms.

Sincerely,

Paul Geary

cc: Haig Jeghelian
Janet Jeghelian

Sworn before me Angela Coupal Notary Public in Middlesex County, State of Massachusetts on this 27th day of September 1994

Notary Public
Angela Coupal

My Commission
Expires on October 14, 1999

2504363102 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 6, 1994

Paul S. Geary
103 Central Street, Apt 3R
Lowell, MA 01852

RE: MUR 4072

Dear Mr. Geary:

This letter acknowledges receipt on September 30, 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 4072. Please refer to this number in all future communications. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

Sincerely,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

Enclosure
Procedures

25043631030

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 6, 1994

Haig E. Jeghelian, Treasurer
Jeghelian for Senate Committee
161 Pleasant Valley Road
Westwood, MA 02090

RE: MUR 4072

Dear Mr. Jeghelian:

The Federal Election Commission received a complaint which indicates that the Jeghelian for Senate 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 4072. 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,

Mary L. Taksar

Mary L. Taksar, Attorney
Central Enforcement Docket

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

2504363103 2

Haig Jeghelian
Treasurer - "Jeghelian for Senate Committee"
161 Pleasant Valley Road, Westwood Ma 02090

October 16, 1994

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
Oct 20 11 10 AM '94

Mary L. Taksar, Attorney
Central Enforcement Docket
General Counsel's Office
Federal Election Commission
Washington D. C. 20463

RE: MUR 4072

Dear Ms. Taksar

As Treasurer of the Jeghelian for Senate Committee, I would like to recommend that no action be taken by the F.E.C. on MUR 4072, for the following reasons:

1. Mr. Paul Geary's complaint was essentially a demand to have his debt acknowledged (# 5 page 2 of his complaint).

2. Mr. Geary was advised by the Jeghelian for Senate Committee,Campaign Manager, Mr. Gene Hartigan in early August (after Mr. Geary submitted his original un-Notarized complaint) that he had now provided me (the Treasurer) with the amount due him (Mr Geary) and it would be acknowledged in the 3rd quarter F.E.C. report. And that the reason it wasn't acknowledged in the 2nd Quarter Report was because the Treasurer did not have the information.

Mr. Geary promised Mr. Hartigan that he would not follow through with his complaint and he would not re-submit a Notarized copy of it to the F.E.C. since his debt was verbally acknowledged and would be acknowledged in the F.E.C. 3rd Quarter report.

3. An acknowledgment of his debt has been made in the 3rd quarter F.E.C. report (Schedule D page 6). The acknowledgment was based on input provided to the me as Treasurer, by the Campaign Manager, Mr. Gene Hartigan, of the "Jeghelian for Senate Committee", who had made the original verbal services and payment agreement with Mr. Geary.

4. Mr. Geary's re-submission of his complaint and its docketing by the F.E.C. was a surprise to the Campaign Manager, myself and the Candidate, since his personal debt was verbally acknowledged and he was assured of being formally included in the total campaign debt figures.

5. Mr. Geary, after being informed by the Campaign Manager of this on October 14, 1994 said he would contact the F.E.C. and drop his complaint once he saw a copy of the report.

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However, because of the 15 day time limit to submit my response, and in the event one is required regardless of Mr. Geary's action to drop the complaint, I am filing my response below.

1. Since Mr. Geary was brought on board as a consultant by the Campaign Manager and provided services as requested by him, and since I was under the impression that he would be working gratis (#2 Page 1 of his complaint) or gratis at times, I as Treasurer made payments for his services whenever the Campaign Manager submitted me a bill to do so.

2. Mr. Geary was always paid as instructed and billed by the Campaign Manager, Mr. Hartigan, for whom he was providing the specific services.

3. Mr. Geary was not accurate in stating that after the May 14th Convention, I said that "*I had no intention of paying him anything*" (#3 page 2). No Treasurer in his right mind who is familiar with F.E.C. regulations would even suggest or be a part of such conduct. (Since at that point, no bills or instructions of money owed to Mr. Geary had been submitted to me by Mr. Hartigan, Mr. Geary may have honestly inferred from this, that he would not be paid.)

4. As a matter of fact, two weeks after the Convention, on June 1, 1994, Mr. Geary was paid $450, on good faith, even though the Campaign Manager, Mr. Hartigan, at that time, had not submitted a statement to me as Treasurer, of any money owed Mr. Geary.

5. This additional $450 paid him, makes the total owed him now $1450 and not the $1900 presented in his claim. When Mr. Geary is made aware of this payment I am certain that he will readily acknowledge it since it may have been an honest oversight on his part.

6. The problem with Mr. Geary's claim arises from the abrupt end of the campaign. The Campaign Manager, Mr. Hartigan submitted a whole series of outstanding invoices to be itemized as Campaign debts. No bills were submitted for Mr. Geary and three other consultants until after the Second Quarter F.E.C. report had been filed. They are all now included in the 3rd Quarter report.

I am sorry for the time and inconvenience that this somewhat minor confusion in our campaign may have caused the F.E.C. I do not believe this simple matter requires counsel on our part, but if you advise us to do so for our best interest, because of some F.E.C. regulation we are unfamiliar with that would indicate a violation we have not addressed, please let me know.

Sincerely,

Haig Jeghelian
Treasurer
Jeghelian for Senate Committee

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RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT
2005 JUN 2 AM 10:05

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of) Enforcement Priority
)
)

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

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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.

95043631037

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

95043631038

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

95043631040

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 27, 1995

Paul S. Geary
103 Central Street, Apt. 3R
Lowell, MA 01852

RE: MUR 4072

Dear Mr. Geary:

On September 30, 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 Jeghelian for Senate Committee and Haig E. Jeghelian, as treasurer. 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

95043631041

MUR 4072
JEGHELIAN FOR SENATE COMMITTEE

Paul Geary filed a complaint alleging that the Jeghelian for Senate Committee failed to disclose and acknowledge a $1,900 debt owed to him for salary on the 1994 July Quarterly Report.

In its response, the Jeghelian Committee states that because Mr. Geary sometimes worked gratis, the treasurer made payment for his services only when the campaign manager submitted a bill for Mr. Geary's services. The Committee states that because of the abrupt ending of the campaign, a series of outstanding invoices were submitted by the campaign manager to be itemized as debt but that no invoices were submitted for Mr. Geary's services. According to the Committee, invoices were submitted after the the July Quarterly Report was filed and the debt to Mr. Geary was reported in its next report, the 1994 October Quarterly Report.

This matter involves less significant issues relative to other matters pending before the Commission and a limited amount of money and the Committee took remedial action.

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FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

February 27, 1995

Haig E. Jeghelian, Treasurer
Jeghelian for Senate Committee
161 Pleasant Valley Road
Westwood, MA 02090

RE: MUR 4072

Dear Mr. Jeghelian:

On October 6, 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 Jeghelian for Senate 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

95043631043

MUR 4072
JEGHELIAN FOR SENATE COMMITTEE

Paul Geary filed a complaint alleging that the Jeghelian for Senate Committee failed to disclose and acknowledge a $1,900 debt owed to him for salary on the 1994 July Quarterly Report.

In its response, the Jeghelian Committee states that because Mr. Geary sometimes worked gratis, the treasurer made payment for his services only when the campaign manager submitted a bill for Mr. Geary's services. The Committee states that because of the abrupt ending of the campaign, a series of outstanding invoices were submitted by the campaign manager to be itemized as debt but that no invoices were submitted for Mr. Geary's services. According to the Committee, invoices were submitted after the the July Quarterly Report was filed and the debt to Mr. Geary was reported in its next report, the 1994 October Quarterly Report.

This matter involves less significant issues relative to other matters pending before the Commission and a limited amount of money and the Committee took remedial action.

95043631044

FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

THIS IS THE END OF MUR # 4072

DATE FILMED 3-7-95 CAMERA NO. 2

CAMERAMAN JMK

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