



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 1247

Date Filmed May 12, 1981 Camera No. --- 2

Cameraman SPC



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard B. Humbert, Esq.
3333 Michelson Drive
Irvine, California 92730

Re: MUR 1247

Dear Mr. Humbert:

On March 24, 1981, the Commission found reason to believe that Robert Fluor and Fluor Corporation Public Affairs Committee had violated 2 U.S.C. § 441a(a)(1)(C) and 2 U.S.C. § 441a(f), respectively, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

A handwritten signature in black ink, reading "John Warren McGarry", is written over the typed name.

John Warren McGarry
Chairman

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard B. Humbert, Esq.
3333 Michelson Drive
Irvine, California 92730

Re: MUR 1247

Dear Mr. Humbert:

On , 1981, the Commission found reason to believe that Robert Fluor and Fluor Corporation Public Affairs Committee had violated 2 U.S.C. § 441a(a)(1)(C) and 2 U.S.C. § 441a(f), respectively, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

John Warren McGarry
Chairman

2.8.
3/27/81

81030244712



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mark J. Sadoff
1346 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1247

Dear Mr. Sadoff:

The Federal Election Commission has reviewed the allegations of your complaint dated June 11, 1980 and determined that on the basis of the information provided by the Respondents that there is no reason to believe that Raymond Montano and the Grumman Political Action Committee committed violations of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code.

On March 24, 1981, the Commission found reason to believe that Robert Fluor and Fluor Corporation Public Affairs Committee violated 2 U.S.C. § 441a(a)(1)(C) and 2 U.S.C. § 441a(f), respectively. However, after considering the circumstances of this matter, the Commission has determined to take no further action.

Accordingly, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

Charles N. Steele
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

81030244714
Mark J. Sadoff
1346 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1247

Dear Mr. Sadoff:

The Federal Election Commission has reviewed the allegations of your complaint dated June 11, 1980 and determined that on the basis of the information provided by the Respondents that there is no reason to believe that Raymond Montano and the Grumman Political Action Committee committed violations of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code.

On , 1981, the Commission found reason to believe that Robert Fluor and Fluor Corporation Public Affairs Committee violated 2 U.S.C. § 441a(a)(1)(C) and 2 U.S.C. § 441a(f), respectively. However, after considering the circumstances of this matter, the Commission has determined to take no further action.

Accordingly, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 30, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Wachino, Jr.
Treasurer
Grumman Political Action Committee
1111 Stewart Avenue
Bethpage, New York 11714

Dear Mr. Wachino:

On June 16, 1980, the Commission notified you of a complaint alleging that your committee and Raymond Montano may have violated certain sections of the Federal Election Campaign Act of 1971, as amended or Chapters 95 and 96 of Title 26, U.S. Code.

The Commission, on March 24, 1981, determined that on the basis of the information in the complaint and information provided by you that there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission has closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

A handwritten signature in dark ink, appearing to read "Charles N. Steele".

Charles N. Steele
General Counsel

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Wachino, Jr.
Treasurer
Grunman Political Action Committee
1111 Stewart Avenue
Bethpage, New York 11714

Dear Mr. Wachino:

On June 16, 1980, the Commission notified you of a complaint alleging that your committee and Raymond Montano may have violated certain sections of the Federal Election Campaign Act of 1971, as amended or Chapters 95 and 96 of Title 26, U.S. Code.

The Commission, on , 1981, determined that on the basis of the information in the complaint and information provided by you that there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission has closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles H. Steele
General Counsel

7.A.18
3/27/81

81030244716

BEFOEE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1247
Robert Fluor)
Robert Fluor Corporation Public)
Affairs Committee)
Raymond Montano)
Grumman Political Action Committee ;

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal
Election Commission, do hereby certify that on March 24, 1981,
the Commission decided by a vote of 4-2 to take the
following actions regarding MUR 1247:

1. Find REASON TO BELIEVE that
Robert Fluor violated 2 U.S.C.
§ 441a(a)(1)(C).
2. Find REASON TO BELIEVE that
Fluor Corporation Public Affairs
Committee violated 2 U.S.C. § 441a(f).
3. Find NO REASON TO BELIEVE that
Raymond Montano violated 2 U.S.C.
§ 441a(a)(1)(C).
4. Find NO REASON TO BELIEVE that
Grumman Political Action Committee
violated 2 U.S.C. § 441a(f).
5. Send the letters as attached to the
First General Counsel's Report dated
March 11, 1981.

(Continued)

CERTIFICATION

MUR 1247

First General Counsel's Report

Dated March 12, 1981

Page 2

6. Take no further action and
CLOSE THE FILE.

Commissioners Harris, Reiche, Thomson, and Tiernan voted
affirmatively for the decision. Commissioners Aikens and McGarry
dissented.

Attest:

3/24/81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 3-12-81, 11:02
Circulated on 48 hour vote basis: 3-12-81, 4:00
Objections filed. Placed on March 24, 1981 agenda



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
DATE: MARCH 17, 1981
SUBJECT: OBJECTION - MUR 1247, General Counsel's Report,
dated March 12, 1981; Received in OCS, 3-12-81,
11:02

The above-named document was circulated on a 48
hour vote basis at 4:00, March 12, 1981.

Commissioners McGarry and Aikens submitted an objection
on March 16, 1981 at 1:29 and 3:53 p.m., respectively.

This matter will be placed on the Executive Session
Agenda for Tuesday, March 24, 1981.

810101710

March 12, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1247

Please have the attached First GC Report distributed
to the Commission on a 48 hour tally basis. Thank you.

81030244720

FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20460

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION

3-12-81

MUR # 1247 AL: 02
DATE COMPLAINT RECEIVED
BY OGC June 16, 1980

STAFF MEMBER Sterling

COMPLAINANT'S NAME: Mark Sadoff

RESPONDENTS' NAMES: Robert Fluor, Fluor Corporation Public
Affairs Committee, Raymond Montano,
Grumman Political Action Committee

RELEVANT STATUTE: 2 U.S.C. § 441a(a)(1)(C)
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Reports of Grumman Political Action
Committee and Fluor Corporation Public
Affairs Committee

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

Complainant, an employee of Americans Concerned About Corporate Power alleges that Robert Fluor, Chairman and Chief Executive Officer of the Fluor Corporation, contributed \$5,062.24 to the Fluor Corporation Public Affairs Committee in violation of 2 U.S.C. § 441a(a)(1)(C) and that Raymond Montano contributed \$5,745.71 to the Grumman Political Action Committee in violation of 2 U.S.C. § 441a(a)(1)(C).

FACTUAL AND LEGAL ANALYSIS

In a notarized and sworn complaint dated June 11, 1980, the complainant alleges that Robert Fluor, Chairman and Chief Executive Officer of the Fluor Corporation exceeded the contribution limitation in 2 U.S.C. § 441a(a)(1)(C) by making contributions totalling \$5,062.24 to the Fluor Corporation Public Affairs Committee in 1979. The reports of the Committee reveal that, as of December 31, 1979, Robert Fluor had an aggregate year-to-date contribution total of \$5,062.24. In his response to the Commission's notification letter, counsel for Robert Fluor stated that Fluor's political contributions

were automatically deducted from his wages and bonuses by the company's computer at the rate of one percent per paycheck, but that the computer was not programmed to terminate deductions at the legal \$5,000 level. As a result, due to a large year-end bonus, the computer deducted a total of \$5,062.24 for 1979. When the error was discovered, the excess of \$62.24 was refunded to Fluor by a check dated April 29, 1980.

The complainant also alleges that Raymond Montano, an accountant employed by the Grumman Corporation, exceeded the limitation in § 441a(a)(1)(C) by contributing \$5,745.71 to the Grumman Political Action Committee during 1979. The December 1979 monthly report of the Grumman Political Action Committee contains an entry on Schedule A under "exempt legal and accounting fees" in the amount \$3,020.37 from Raymond Montano. His aggregate year to date total is indicated as \$5,745.71. On Schedule B an expenditure for exempt legal and accounting fees to the Carter-Mondale Re-election Committee is disclosed in the amount of \$3,020.37.

In its response to the Commission's notification letter, counsel for Grumman Corporation indicated that Montano is a full time employee of the corporation and that his services as an accountant were made available to the Carter-Mondale Re-election Committee to ensure that Committee's compliance with the Act. He further states that the provision of these services is not a contribution pursuant to 2 U.S.C. § 431(8)(B)(ix). In support of these contentions he submitted a copy of a letter to the Commission dated February 15, 1980, in which, pursuant to a request from Robert Snow, Reports Analyst, he indicates that he is amending the year end report to delete the accounting expenses but will continue to include a "memo attachment" indicating such expenses because the PAC feels obligated to report them. Robert Snow had advised the Grumman Political Action Committee staff that if these were exempt legal and accounting services provided by the Grumman Corporation, they should not appear in the reports of Grumman Political Action Committee as contributions or expenditures.

2 U.S.C. § 441a(a)(1)(C) prohibits persons from making contributions to political committees other than authorized candidate committees and national party committees in excess of \$5,000 in any calendar year. Robert Fluor apparently violated that section in contributing \$5,062.24 to the Fluor Corporation Public Affairs Committee in 1979. The Committee apparently violated 2 U.S.C. § 441a(f) in accepting the excessive contribution. However, the violations are mitigated by the fact that the excess was only \$62.24, that it was the result of a computer programming oversight and that it was refunded when discovered by the committee prior to notification by the Commission. Consequently, we are recommending that the Commission find reason to believe that Fluor and the Committee violated these sections, but take no further action.

2 U.S.C. § 431(8)(B)(ix) excludes from the definition of the term contribution "any legal or accounting services rendered to ... (a political committee) ... if the person paying for such services

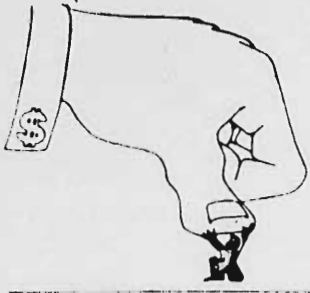
is the regular employer of the individual rendering such services and if such services are solely for the purpose of ensuring compliance with this Act or Chapter 95 or Chapter 96 of Title 26." Accordingly, Raymond Montano apparently did not make a contribution in violation of § 441a(a)(1)(C) because 1) he was a regular employee of Grumman and 2) the providing of his services as an accountant to the Carter-Mondale Committee, according to Grumman, was to ensure its compliance with the Act.

RECOMMENDATIONS

1. Find reason to believe that Robert Fluor violated 2 U.S.C. § 441a(a)(1)(C).
2. Find reason to believe that Fluor Corporation Public Affairs Committee violated 2 U.S.C. § 441a(f).
3. Find no reason to believe that Raymond Montano violated 2 U.S.C. § 441a(a)(1)(C).
4. Find no reason to believe that Grumman Political Action Committee violated 2 U.S.C. § 441a(f).
5. Send the attached letters.
6. Take no further action and close the file.

Attachments

1. Complaint
2. Response of Robert Fluor
3. Response of Grumman Political Action Committee
4. Letters (3)



mur 1247

BIG BUSINESS DAY APRIL 17, 1980

1346 Connecticut Avenue, NW
Room 411
Washington, DC 20036
(202) 861-0456

Board of Advisors

RALPH NADER
JOHN KENNETH GALBRAITH
WILLIAM H. WYNN
DOUGLAS A. FRASER
PATSY J. MINK
JAMES FARMER

GAR ALPEROVITZ
IRA ARLOOK
ED ASNER
GEORGE BALLIS
RICHARD BARNET
JONATHAN BINGHAM
JULIAN BOND
HEATHER BOOTH
DAVID BROWER
CESAR CHAVEZ
JACOB CLAYMAN
BARRY COMMONER
JOHN CONYERS
ART DANFORTH
RONALD V. DELLUMS
DAVID J. FITZMAURICE
ED GARVEY
ROBERT GEORGINE
RUTH YANNATA GOLDWAY
BISHOP THOMAS GUMBLETON
ROBERT HARBRANT
GEORGE HARDY
MICHAEL HARRINGTON
FRED HARRIS
RICHARD G. HATCHER
ROBERT HEILBRONER
MSGR. GEORGE HIGGINS
JIM HIGHTOWER
IRVING HOWE
WILLIAM HUTTON
MILDRED JEFFREY
FRANCES MOORE LAPPE
ROBERT LEKACHMAN
SR. BARBARA LUPO
FRANK D. MARTINO
JOYCE MILLER
IRIS MITGANG
KATHLEEN O'REILLY
WADE RATHKE
BRUCE RATNER
JEREMY RIFKIN
BENJAMIN ROSENTHAL
DONALD ROSS
CARL SCARBROUGH
ARTHUR SCHLESINGER, JR.
STANLEY SHEINBAUM
SCOTT SKLAR
TIMOTHY SMITH
RABBI MARC TANENBAUM
MARY LUKE TOBIN, S.L.
HAROLD WILLENS
SANDRA WILLET
WILLIAM W. WINPISINGER
JERRY WURF

Board of Directors

MARK GREEN
MICHAEL JACOBSON
ANN BEAUDRY
JULF BERNSTEIN
DAVID BURGESS
THOM FASSETT
PETER HARNIK
VICTOR KAMBER
ALICE TEPPER MARLIN
WILLIAM OLWELL
MARJORIE PHYFE
PAT FORD-ROEGNER
FRANK VIGGIANO

June 11, 1980

General Counsel
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20463

Dear Sir:

In the process of reviewing some of your public records on Political Action Committees (PAC's), I have come across two disturbing bits of information which appear to be in violation of §441a. (1)(C) of the Federal Election Campaign Laws. I am therefore filing this formal complaint.

In the itemized receipts of the Grumman Political Action Committee's December 1979 report, there appears a receipt for \$3,020.37 given by Raymond Montano of 200 S. Vandorn St., Alexandria, Virginia 22304. Mr. Montano, at the time acted as the Senior Cost Analyst for Grumman Aerospace Corporation, Bethpage, New York 11714. This contribution of December, 1979 brought Mr. Montano's aggregate contribution to the Grumman PAC to \$5745.71 which exceeds the \$5000 limit specified in the above mentioned section of the law (see attached sheet #1).

In addition, I would like to point out the contribution of Mr. Robert Fluor, Chairman of the Board, President and Chief Executive Officer of the Fluor Corporation. In 1979, Mr. Fluor also exceeded the limit established in §441a. (1)(C) with his contribution totaling \$5062.24 as of December 29, 1979 (see attached sheet #2).

I hereby conclude by stating that all allegations and statements contained in this formal complaint are, to the best of my knowledge, true.

Sincerely,

Mark J. Sadoff
Mark J. Sadoff, staff

Encl: (2) two DISTRICT OF COLUMBIA

Subscribed and sworn to before me this
11 day of June, 1980
Edward F. Coe
 Notary Public
 My Commission Expires November 30, 1983

Attachment
1

SCHEDULE A
REVISED
 January, 1978
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

Attached Sheet #1

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
 Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
 of FEC FORM 3

Page 12 of 12 for
 Line Number 15

(Use Separate Schedules for
 each numbered line)

Name of Candidate or Committee in Full			
GRUSSMAN POLITICAL ACTION COMMITTEE (EXEMPT LEGAL & ACCOUNTING FEES)			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Raymond Montano 200 S. Vandorn St. Alexandria, VA 22304	Grumman Aerospace Corp. Bethpage, NY 11714	12/1 thru 12/31/79	3,020.37
Receipt for ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date <u>\$ 3,145.11</u>	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date \$	
SUBTOTAL of receipts this page (optional)			\$ 3,020.37
TOTAL this period (list p. of this line number only)			\$

8 1 0 1 2 4 1 7 2 6
1 1 2 3 7

PAGE 2

Attached Sheet #2

RECEIVED
 January 15, 1980
 Federal Election Commission
 1325 K Street, N.W.
 Washington, D.C. 20463

PERMANENT EXPENDITURES
 (Operating, Transfers Out, Contributions in Kind,
 Loans, Loan Repayments and Refunds Made)
 Supporting Lines 20a, 21a, and 22a, 22b, and 22c
 of FEC FORM 3

Page 20 of 20
 Line 20-22c
 (Use Separate Columns for
 each numbered line)

Name of Candidate or Committee in Full GRUBMAN POLITICAL ACTION COMMITTEE (EXEMPT LEGAL & ACCOUNTING FEES)			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Carter/Mondale Presidential Committee P.O. Box 500 Washington, D.C. 20044	Legal & Accounting Services Expenditure for: ☐ Primary ☐ General ☐ Other	12/1 thru 12/31/79	\$3,020.37
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Expenditure for: ☐ Primary ☐ General ☐ Other	Date (month, day, year)	Amount of each expenditure this period
SUBTOTAL of expenditures (this page optional)			\$
TOTAL this period (last page this line number only)			\$ 3,020.37

0101001797

000115215

Sterling

RECEIVED

GC#1858

JUL 2 1980

RICHARD B. HUMBERT
ATTORNEY AND COUNSELOR AT LAW

TELEPHONE
(714) 975-7261

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730

June 27, 1980

Federal Election Commission
Washington
District of Columbia 20463

908958

Attention: Mr. Charles N. Steele
General Counsel

Gentlemen:

Re: MUR 1247

Mr. J. R. Fluor has designated me to represent him in the above-identified matter. The facts in the matter are as follows:

Contributions to the Fluor Political Action Committee (Fluor PAC) were made by computer payroll deduction. In Mr. Fluor's case he authorized a 1% contribution of all of his wages and bonuses. Unfortunately the computer was not programmed to stop the contributions at the \$5,000 level. By the middle of December 1979 a total of \$3,322.24 had been deducted from Mr. Fluor's salary checks by the computer. On the last day of December 1979 Mr. Fluor received a year end bonus of \$174,000, and again the computer deducted 1% of that amount, which added to the previously deducted \$3,322.24, made a total deduction for Mr. Fluor for the year of \$5,062.24.

The computer run of these deductions formed a part of Fluor PAC's reporting of receipts and expenditures for the fourth quarter of 1979, and in the hustle and bustle of year end activities, no one took the trouble to check the computer run before it was forwarded to you. Subsequently such a check was made and the over deduction of \$62.24 was refunded to Mr. Fluor. Steps have been taken to ensure that this over deduction will not take place again.

If you need anything further with respect to this matter, please let me know.

Very truly yours,

Richard B. Humbert

Richard B. Humbert

RBH:svj

20:5d 2 706 05

P.S.

Enclosed is a copy of the refund check to Mr. Fluor.

Attachment

2

FLUOR PUBLIC AFFAIRS COMMITTEE

000135

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730
TELEPHONE: (714) 975-2000

April 29 19 80

16-313
1220

AY TO THE
ORDER OF

J. R. Fluor

\$ 62.24

62.24

DOLLARS



CALIFORNIA CANADIAN BANK
4699 JAMBOREE RD
NEWPORT BEACH, CA 92660

~~NOT NEGOTIABLE~~

FLUOR PUBLIC AFFAIRS COMMITTEE
IRVINE, CALIFORNIA

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	DESCRIPTION	AMOUNT
04/29/80	J. R. Fluor Refund for excess 1979 contributions	\$62.24

**GRUMMAN POLITICAL ACTION
COMMITTEE**
1111 STEWART AVENUE
BETHPAGE, NEW YORK 11714

June 24, 1980

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Attention: Charles N. Steele, Esq.
General Counsel

Re: MUR ~~1237~~
1247

Gentlemen:

This is in response to the Commission's letter dated June 16, 1980, together with enclosures, relating to a complaint alleging that the Grumman Political Action Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 USC §431 et seq. of the Act (the "Act") or Chapters 95 and 96 of Title 26, U. S. Code.

We take this opportunity to demonstrate, in writing, that no action should be taken against the Grumman Political Action Committee in connection with the matter referred to in your letter.

The matter described in the letter of complaint enclosed with your letter involves the services of a certified public accountant, Mr. Raymond Montano, a regular full-time employee of Grumman Aerospace Corporation. Mr. Montano's services have been made available to the Carter-Mondale Presidential Committee, solely for the purpose of ensuring compliance with 2 USC §431 et seq. and Chapters 95 and 96 of 26 USC. Mr. Montano's position with his employer remains open and no one was hired to fill his function while he rendered the exempt accounting services to the Carter-Mondale Presidential Committee. As such, the provision of Mr. Montano's services are exempt from the restrictions of the Act and of Chapters 95 and 96 of 26 USC.

This is supported by the following analysis:

The term "contribution," as defined in §431 (8) (B) (ix) of the Act, does not include accounting services rendered to or on behalf of an authorized committee of a candidate or any other political committee, if the person paying for such services is the regular employer of the individual rendering such services and if such services are solely for the purpose of ensuring compliance with the Act or Chapter 95 or 96 of Title 26.

Attachment

10 JUN 25 P 2:34

GENERAL COUNSEL

Federal Election Commission

June 24, 1980

The term "expenditure," as defined in §431 (9) (B) (vii) of the Act does not include the payment of compensation for accounting services rendered to or on behalf of a candidate or political committee if the person paying for such services is the regular employer of the person rendering such services and if such services are solely for the purpose of ensuring compliance with the Act or Chapter 95 or 96 of Title 26.

These exemptions are amplified by 11 CFR 100.7(b) (14) and 11 CFR 100.8(b) (15) which require that amounts paid by the employer for the accounting services shall be reported by the committee receiving the services in accordance with 11 CFR 104.3(h), which requires a committee receiving such services under 100.7(b) (13) and (14) to report the amounts, dates and name of each person performing such services, as a memo entry, on Schedule A.

Because Grumman Corporation intends to abide by the letter and the spirit of the laws, it has made every effort to avoid even the appearance of attempting to circumvent an obstacle. It sought guidance from the Federal Election Commission on how the accountant's services were to be reported, and while the issue was not free from doubt, decided to note the provision of the certified public accountant on a memo attachment to the form filed with the Federal Election Commission by the Grumman Political Action Committee, as indicated in the enclosed copy of my letter dated February 15, 1980 to the Federal Election Commission.

In this regard, please note that the schedule complained of in the enclosure with your certified letter dated June 16, 1980 was clearly marked at the top "EXEMPT LEGAL & ACCOUNTING FEES." Mr. Raymond Montano, a certified public accountant, did not and has not made a contribution in the amount referenced on that modified schedule. In the interests of full disclosure, we shall continue to report any such exempt services on a memo attachment to the Grumman Political Action Committee's reports.

If you have any questions regarding this matter or if we can be of further assistance in clarifying the reason why no action should be taken against the Grumman Political Action

3-2

Federal Election Commission

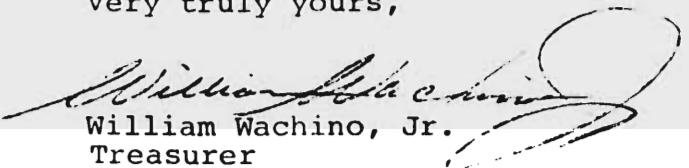
June 24, 1980

Committee in connection with this matter, please advise the undersigned at:

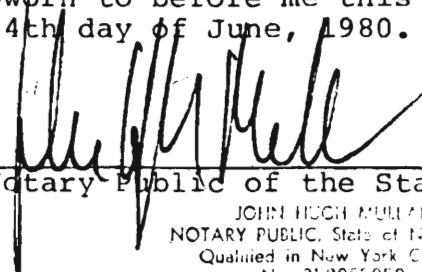
Grumman Political Action Committee
1111 Stewart Avenue
Bethpage, N. Y. 11714

or call me at (516) 575-3687

Very truly yours,


William Wachino, Jr.
Treasurer
Grumman Political Action Committee

Sworn to before me this
24th day of June, 1980.


Notary Public of the State of New York

JOHN HOCH MULVAN
NOTARY PUBLIC, State of New York
Qualified in New York County
No. 31-8052050
Cert. Filed Nassau & Suffolk Counties
Commission Expires March 30, 1982

GRUMMAN POLITICAL ACTION
COMMITTEE
1111 STEWART AVENUE
BETHPAGE, NEW YORK 11714

February 15, 1980

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Sir:

The Grumman Political Action Committee is filing an amended year end report to delete from its receipts and disbursements, the accounting of expenses, for a loaned Grumman professional accountant to the Carter/Mondale reelection committee. The institution of this revision is on the advise of your Mr. Robert Snow (202-357-0026).

In future reports, the above mentioned will not be included in our filings, however, we feel obligated to report these expenses so we are planning to include a memo attachment indicating such expenses, but will not have an effect on our reporting of receipts and disbursements.

Very truly yours,

William Wachino, Jr.
Treasurer

WW:jb

3-4



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Richard B. Humbert, Esq.
3333 Michelson Drive
Irvine, California 92730

Re: MUR 1247

Dear Mr. Humbert:

On , 1981, the Commission found reason to believe that Robert Fluor and Fluor Corporation Public Affairs Committee had violated 2 U.S.C. § 441a(a)(1)(C) and 2 U.S.C. § 441a(f), respectively, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the above referenced MUR. However, after considering the circumstances of this matter, the Commission has determined to take no further action and close its file. The file will be made part of the public record within 30 days. Should you wish to submit any materials to appear on the public record, please do so within 10 days.

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

John Warren McGarry
Chairman

01000041732



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William Wachino, Jr.
Treasurer
Grumman Political Action Committee
1111 Stewart Avenue
Bethpage, New York 11714

Dear Mr. Wachino:

On June 16, 1980, the Commission notified you of a complaint alleging that your committee and Raymond Montano may have violated certain sections of the Federal Election Campaign Act of 1971, as amended or Chapters 95 and 96 of Title 26, U.S. Code.

The Commission, on _____, 1981, determined that on the basis of the information in the complaint and information provided by you that there is no reason to believe that a violation of any statute within its jurisdiction has been committed. Accordingly, the Commission has closed its file in this matter. This matter will become a part of the public record within 30 days.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mark J. Sadoff
1346 Connecticut Avenue, N.W.
Washington, D.C. 20036

Re: MUR 1247

Dear Mr. Sadoff:

The Federal Election Commission has reviewed the allegations of your complaint dated June 11, 1980 and determined that on the basis of the information provided by the Respondents that there is no reason to believe that Raymond Montano and the Grumman Political Action Committee committed violations of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code.

On , 1981, the Commission found reason to believe that Robert Fluor and Fluor Corporation Public Affairs Committee violated 2 U.S.C. § 441a(a)(1)(C) and 2 U.S.C. § 441a(f), respectively. However, after considering the circumstances of this matter, the Commission has determined to take no further action.

Accordingly, the Commission has decided to close the file in this matter.

Should additional information come to your attention which you believe establishes a violation of the Act, please contact Victor Sterling, the attorney assigned to this matter at 202-523-4175.

Sincerely,

Charles N. Steele
General Counsel

J. R. FLUOR
Chairman and Chief Executive Officer

RECEIVED
600*1861
JUL 7 AM 10 52
FLUOR CORPORATION

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730 U. S. A.
TELEPHONE: (714) 975-2000

June 27, 1980

Federal Election Commission
Washington
District of Columbia 20463

908947

Attention: Mr. Charles N. Steele
General Counsel

Gentlemen:

Re: MUR 1247

I have your letter of June 16, 1980 concerning an alleged violation of the Federal Election Campaign Act of 1971.

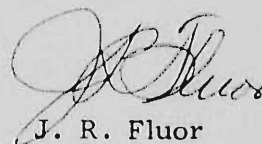
Please be advised that I will be represented by Counsel. His name, address and telephone number are as follows:

Richard B. Humbert
3333 Michelson Drive
Irvine, CA 92730

Tel: 714-975-7261

I authorize Mr. Humbert to receive any notification or communication from the Commission.

Very truly yours,


J. R. Fluor

88:42 7 JUL 01

RECEIVED
JUL 7 1980

8
3
3
3
1
1
1
1
1
0
1
1
3
FLUOR CORPORATION

Federal Election Commission
Washington
District of Columbia 20463

Attn: Mr. Charles N. Steele
General Counsel

600#1808
2

RICHARD B. HUMBERT
ATTORNEY AND COUNSELOR AT LAW

TELEPHONE
94 975-7261

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730

June 27, 1980

Federal Election Commission
Washington
District of Columbia 20463

508958

Attention: Mr. Charles N. Steele
General Counsel

Gentlemen:

Re: MUR 1247

Mr. J. R. Fluor has designated me to represent him in the above-identified matter. The facts in the matter are as follows:

Contributions to the Fluor Political Action Committee (Fluor PAC) were made by computer payroll deduction. In Mr. Fluor's case he authorized a 1% contribution of all of his wages and bonuses. Unfortunately the computer was not programmed to stop the contributions at the \$5,000 level. By the middle of December 1979 a total of \$3,322.24 had been deducted from Mr. Fluor's salary checks by the computer. On the last day of December 1979 Mr. Fluor received a year end bonus of \$174,000, and again the computer deducted 1% of that amount, which added to the previously deducted \$3,322.24, made a total deduction for Mr. Fluor for the year of \$5,062.24.

The computer run of these deductions formed a part of Fluor PAC's reporting of receipts and expenditures for the fourth quarter of 1979, and in the hustle and bustle of year end activities, no one took the trouble to check the computer run before it was forwarded to you. Subsequently such a check was made and the over deduction of \$62.24 was refunded to Mr. Fluor. Steps have been taken to ensure that this over deduction will not take place again.

If you need anything further with respect to this matter, please let me know.

Very truly yours,

RBH:svj

20:5 d


Richard B. Humbert

P.S.

Enclosed is a copy of the refund check to Mr. Fluor.

2 JUL 08

FLUOR PUBLIC AFFAIRS COMMITTEE

000135

3333 MICHELSON DRIVE
IRVINE, CALIFORNIA 92730
TELEPHONE: (714) 975-2000

April 29 19 80

16-313
1220

PAY TO THE
ORDER OF

J. R. Fluor

\$ 62.24

62 and 24/100

DOLLARS



CALIFORNIA CANADIAN BANK
4699 JAMBOREE RD
NEWPORT BEACH, CA 92660

FLUOR PUBLIC AFFAIRS COMMITTEE
IRVINE, CALIFORNIA

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

DATE	DESCRIPTION	AMOUNT
04/29/80	J. R. Fluor Refund for excess 1979 contributions	\$62.24

RICHARD B. HUMBERT

ATTORNEY AND COUNSELOR AT LAW

3333 MICHELSON DRIVE

IRVINE, CALIFORNIA 92714

Federal Election Commission
Washington
District of Columbia 20463

Attention: Mr. Charles N. Steele
General Counsel

GRUMMAN POLITICAL ACTION
COMMITTEE
1111 STEWART AVENUE
BETHPAGE, NEW YORK 11714

June 24, 1980

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Attention: Charles N. Steele, Esq.
General Counsel

Re: MUR 1247

Gentlemen:

This is in response to the Commission's letter dated June 16, 1980, together with enclosures, relating to a complaint alleging that the Grumman Political Action Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended, 2 USC §431 et seq. of the Act (the "Act") or Chapters 95 and 96 of Title 26, U. S. Code.

We take this opportunity to demonstrate, in writing, that no action should be taken against the Grumman Political Action Committee in connection with the matter referred to in your letter.

The matter described in the letter of complaint enclosed with your letter involves the services of a certified public accountant, Mr. Raymond Montano, a regular full-time employee of Grumman Aerospace Corporation. Mr. Montano's services have been made available to the Carter-Mondale Presidential Committee, solely for the purpose of ensuring compliance with 2 USC §431 et seq. and Chapters 95 and 96 of 26 USC. Mr. Montano's position with his employer remains open and no one was hired to fill his function while he rendered the exempt accounting services to the Carter-Mondale Presidential Committee. As such, the provision of Mr. Montano's services are exempt from the restrictions of the Act and of Chapters 95 and 96 of 26 USC.

This is supported by the following analysis:

The term "contribution," as defined in §431 (8) (B) (ix) of the Act, does not include accounting services rendered to or on behalf of an authorized committee of a candidate or any other political committee, if the person paying for such services is the regular employer of the individual rendering such services and if such services are solely for the purpose of ensuring compliance with the Act or Chapter 95 or 96 of Title 26.

0 JUN 25 P 2:34

Federal Election Commission

June 24, 1980

The term "expenditure," as defined in §431 (9)(B)(vii) of the Act does not include the payment of compensation for accounting services rendered to or on behalf of a candidate or political committee if the person paying for such services is the regular employer of the person rendering such services and if such services are solely for the purpose of ensuring compliance with the Act or Chapter 95 or 96 of Title 26.

These exemptions are amplified by 11 CFR 100.7(b)(14) and 11 CFR 100.8(b)(15) which require that amounts paid by the employer for the accounting services shall be reported by the committee receiving the services in accordance with 11 CFR 104.3(h), which requires a committee receiving such services under 100.7(b)(13) and (14) to report the amounts, dates and name of each person performing such services, as a memo entry, on Schedule A.

Because Grumman Corporation intends to abide by the letter and the spirit of the laws, it has made every effort to avoid even the appearance of attempting to circumvent an obstacle. It sought guidance from the Federal Election Commission on how the accountant's services were to be reported, and while the issue was not free from doubt, decided to note the provision of the certified public accountant on a memo attachment to the form filed with the Federal Election Commission by the Grumman Political Action Committee, as indicated in the enclosed copy of my letter dated February 15, 1980 to the Federal Election Commission.

In this regard, please note that the schedule complained of in the enclosure with your certified letter dated June 16, 1980 was clearly marked at the top "EXEMPT LEGAL & ACCOUNTING FEES." Mr. Raymond Montano, a certified public accountant, did not and has not made a contribution in the amount referenced on that modified schedule. In the interests of full disclosure, we shall continue to report any such exempt services on a memo attachment to the Grumman Political Action Committee's reports.

If you have any questions regarding this matter or if we can be of further assistance in clarifying the reason why no action should be taken against the Grumman Political Action

Federal Election Commission

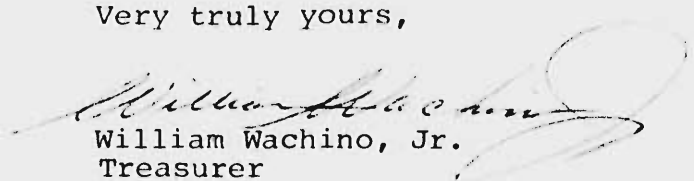
June 24, 1980

Committee in connection with this matter, please advise the undersigned at:

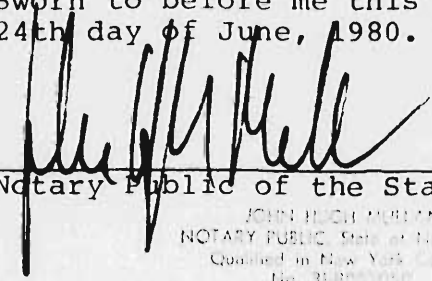
Grumman Political Action Committee
1111 Stewart Avenue
Bethpage, N. Y. 11714

or call me at (516) 575-3687

Very truly yours,


William Wachino, Jr.
Treasurer
Grumman Political Action Committee

Sworn to before me this
24th day of June, 1980.


Notary Public of the State of New York

JOHN HUGH MULLAN
NOTARY PUBLIC, State of New York
Qualified in New York County
No. 31897050
Cert. Filed Nassau & Suffolk Counties
Commission Expires March 30, 1982

01010040744

GRUMMAN POLITICAL ACTION
COMMITTEE
1111 STEWART AVENUE
BETHPAGE, NEW YORK 11714

February 15, 1980

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Dear Sir:

The Grumman Political Action Committee is filing an amended year end report to delete from its receipts and disbursements, the accounting of expenses, for a loaned Grumman professional accountant to the Carter/Mondale reelection committee. The institution of this revision is on the advise of your Mr. Robert Snow (202-357-0026).

In future reports, the above mentioned will not be included in our filings, however, we feel obligated to report these expenses so we are planning to include a memo attachment indicating such expenses, but will not have an effect on our reporting of receipts and disbursements.

Very truly yours,

William Wachino, Jr.
Treasurer

WW:jb

William Wachino, Jr.

GRUMMAN

POLITICAL ACTION
COMMITTEE

1111 STEWART AVENUE
BETHPAGE, NEW YORK 11714

Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Attn: Charles N. Steele, Esq.
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20461

June 16, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Grumman Political Action Committee
Grumman Aerospace Corporation
Bethpage, New York 11714

Re: MUR 1237

Dear Sir or Madam:

This letter is to notify you that on June 11, 1980, the Federal Election Commission received a complaint which alleges that your Committee may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1247. 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 your Committee in connection with this matter. Your response 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.

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.

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 sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Letter to: Grumman Political Action
Committee

Page Two

If you have any questions, please contact Victor Sterling,
the attorney assigned to this matter at (202) 523-4175. For
your information, we have attached a brief description of
the Commission's procedure for handling complaints.

Sincerely,

[Signature]
Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

PS Form 3811 Aug 1978

● SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one)

☐ Show to whom and date delivered	_____
☐ Show to whom, date, and address of delivery	_____
☐ RESTRICTED DELIVERY	_____
Show to whom and date delivered	_____
☐ RESTRICTED DELIVERY	_____
Show to whom, date, and address of delivery	_____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
GRUMMAN PAC

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>5315nb</i>	

1 (Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☒ Addressee *38* ☐ Authorized agent

4. DATE OF DELIVERY *134740* POSTMARK *W*

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

1287

Stirling

To: The File

From: Victor Sterling V.J.

Subject: MUR 1247

Please do not re-send the letter addressed to Robert Montano.

81030241749

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

POSTAGE AND FEES PAID



CLAIM CHECK
NO

DATE

1ST NO.

2ND NOTICE

RETURN

Detached 1.
PS Form 384
May 1971

Raymond Montano
344 South Van Dorn Street
Alexandria, Virginia

CERTIFIED

mur-1247 Sterling

PC Form 3811, Jan. 1979

● SENDER: Complete items 1, 2, and 3. Add your address in the "RETURN TO" space on reverse.	
1. The following service is requested (check one) ☐ Show to whom and date delivered.....¢ ☐ Show to whom, date and address of delivery.....¢ ☐ RESTRICTED DELIVERY Show to whom and date delivered.....¢ ☐ RESTRICTED DELIVERY. Show to whom, date, and address of delivery. \$ —	
(CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: Raymond Montano 200 South Van Dorn Street Alexandria, Va.	
3. ARTICLE DESCRIPTION: REGISTERED NO. <u>01555</u>	CERTIFIED NO. <u>01555</u> INSURED NO. <u>01555</u>
(Always obtain signature of addressee or agent) I have received the article described above. SIGNATURE ☐ Addressee ☐ Authorized agent	
4. DATE OF DELIVERY	POSTMARK
5. ADDRESS (Complete only if requested)	
6. UNABLE TO DELIVER BECAUSE:	CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆ GPO : 1975-288-848

To: The File- MUR 1247

From Victor Sterling

Please re-send the letter to Raymond Montano at 200 South Van Dorn Street,
Alexandria, Virginia.

81030244752

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business

Penalty for Private Use \$3

CLAIMS CHECK
NO.

☐ HOLD

DATE

6/19
1ST NOTICE

2ND NOTICE

RETURN

Detached from
PS Form 3849-A
May 1979

Mr. Raymond Montano
200 S. Vandorn Street
Alexandria, Virginia 22304

POSTAGE AND FEES PAID



945182

81030241754

ALWAYS
USE ZIP
CODE

- SENDER Complete items 1, 2 and 3.
Add your address in the "RETURN TO" space on
reverse.

- The following services are available (check one):
- ☒ Show to whom and date delivered _____
- ☐ Show to whom date and address of delivery _____
- ☐ RESTRICTED DELIVERY _____
- ☐ Show to whom and date delivered _____
- ☐ RESTRICTED DELIVERY _____
- ☐ Show to whom date and address of delivery _____
- ☐ CONSULT POSTMASTER FOR FEES

2. ARTICLE ADDRESSED TO

Raymond Montano

3. ARTICLE DESCRIPTION

REGISTERED NO	CERTIFIED NO	INSURED NO
	945182	

(Always obtain signature of addressee or agent)

I have received the article described above

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

CLERK'S
INITIALS

RETURN RECEIPT REGISTERED, INSURED AND CERTIFIED MAIL

1247

Stirling



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 16, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Raymond Montano
200 South South Vandorn Street
Alexandria, Virginia 22304

Re: MUR 1247

Dear Mr. Montano:

This letter is to notify you that on June 11, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1247. 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 connection with this matter. Your response 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.

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.

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.

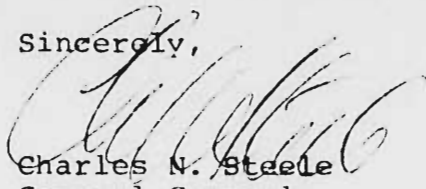
If you intend to be represented by counsel in this matter, please advise the Commission by sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

61030041753

Letter to: Raymond Montano
Page Two

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at (202) 523-4175. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,


Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

6103041756



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

June 16, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Fluor
Chairman and President
Fluor Corporation
P.O. Box 2347
Newport Beach, California 92661

Re: MUR 1247

Dear Mr. Fluor:

This letter is to notify you that on June 11, 1980, the Federal Election Commission received a complaint which alleges that you may have violated certain sections of the Federal Election Campaign Act of 1971, as amended ("the Act") or Chapters 95 and 96 of Title 26, U.S. Code. A copy of this complaint is enclosed. We have numbered this matter MUR 1247. 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 connection with this matter. Your response 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.

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.

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 sending a letter of representation stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Letter to: Robert Fluor
Page Two

If you have any questions, please contact Victor Sterling, the attorney assigned to this matter at (202) 523-4175. For your information, we have attached a brief description of the Commission's procedure for handling complaints.

Sincerely,

Charles N. Steele
Charles N. Steele
General Counsel

Enclosure

1. Complaint
2. Procedures

PS Form 3811, Aug 1978

● SENDER Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one):

☐ Show to whom and date delivered _____

☐ Show to whom, date, and address of delivery _____

☐ RESTRICTED DELIVERY
Show to whom and date delivered _____

☐ RESTRICTED DELIVERY
Show to whom, date, and address of delivery _____

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Robert Fluor

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>945185</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

A. Sterling

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

NEW YORK JUN 23 1980

1247 *Stearns*



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

June 16, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mark J. Sadoff
1346 Connecticut Avenue, N.W.
Room 411
Washington, D.C. 20036

Dear Mr. Sadoff:

This letter is to acknowledge receipt of your complaint of June 11, 1980, against Grumman Political Action Committee, Raymond Montano and Robert Fluor which alleges violations of the Federal Election Campaign laws. A staff member has been assigned to analyze your allegations. The respondents will be notified of this complaint within 5 days and a recommendation to the Federal Election as to how this matter should be initially handled will be made 15 days after the respondents' notification. You will be notified as soon as the Commission takes final action on your complaint. Should you have or receive any additional information in this matter, please forward it to this office. For your information, we have attached a brief description of the Commission's procedures for handling complaints.

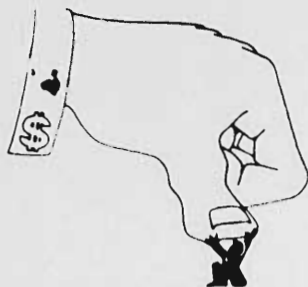
* RETURN: Complete items 1, 2, and 3 (Add your address and return to reverse)	
1. The following service is requested (check one): ☐ Show to whom and the delivery ☐ Show to whom, date and address of delivery ☐ RESTRICTED DELIVERY Show to whom and the delivery ☐ RESTRICTED DELIVERY Show to whom, date and address of delivery (CONSULT POSTMASTER FOR FEES)	
2. ARTICLE ADDRESSED TO: <i>Mark J. Sadoff</i>	
3. ARTICLE DESCRIPTION: REGISTERED NO. <i>445184</i>	INSURED NO.
4. I have received the article described above. SIGNATURE ☐ Addressee ☐ Authorized agent <i>Mark J. Sadoff</i> DATE OF DELIVERY <i>6/19/80</i> 5. ADDRESS (Complete only if requested) <i>Postmark</i>	
6. UNABLE TO DELIVER BECAUSE	CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

6103041759

1247

Stirling



BIG BUSINESS DAY

APRIL 17, 1980

1346 Connecticut Avenue, NW
Room 411
Washington, DC 20036
(202) 861-0456

GENERAL MAIL

GCC # 1626

on JUN 11 A10:41

myck 1247

Board of Advisors

RALPH NADER
JOHN KENNETH GALBRAITH
WILLIAM H. WYNN
DOUGLAS A. FRASER
PATSY J. MINK
JAMES FARMER

GAR ALPEROVITZ
IRA ARLOOK
ED ASNER
GEORGE BALLIS
RICHARD BARNET
JONATHAN BINGHAM
JULIAN BOND
HEATHER BOOTH
DAVID BROWER
CESAR CHAVEZ
JACOB CLAYMAN
BARRY COMMONER
JOHN CONYERS
ART DANFORTH
RONALD V. DELLUMS
DAVID J. FITZMAURICE
ED GARVEY
ROBERT GEORGINE
RUTH YANNATA GOLDWAY
BISHOP THOMAS GUMBLETON
ROBERT HARBRANT
GEORGE HARDY
MICHAEL HARRINGTON
FRED HARRIS
RICHARD G. HATCHER
ROBERT HEILBRONER
MSGR. GEORGE HIGGINS
JIM HIGHTOWER
IRVING HOWE
WILLIAM HUTTON
MILDRED JEFFREY
FRANCES MOORE LAPPE
ROBERT LEKACHMAN
SR. BARBARA LUPO
FRANK D. MARTINO
JOYCE MILLER
IRIS MITGANG
KATHLEEN O'REILLY
WADE RATHKE
BRUCE RATNER
JEREMY RIFKIN
BENJAMIN ROSENTHAL
DONALD ROSS
CARL SCARBROUGH
ARTHUR SCHLESINGER, JR.
STANLEY SHEINBAUM
SCOTT SKLAR
TIMOTHY SMITH
RABBI MARC TANENBAUM
MARY LUKE TOBIN, S.L.
HAROLD WILLENS
SANDRA WILLET
WILLIAM W. WINPISINGER
JERRY WURF

Board of Directors

MARK GREEN
MICHAEL JACOBSON
ANN BEAUDRY
JULES BERNSTEIN
DAVID BURGESS
THOM FASSETT
PETER HARNIK
VICTOR KAMBER
ALICE TEPPER MARLIN
WILLIAM OLWELL
MARJORIE PHYFE
PAT FORD-ROEGNER
FRANK VIGGIANO

June 11, 1980

General Counsel
Federal Election Commission
1325 K St. N.W.
Washington, D.C. 20463

Dear Sir:

In the process of reviewing some of your public records on Political Action Committees (PAC's), I have come across two disturbing bits of information which appear to be in violation of §441a. (1)(C) of the Federal Election Campaign Laws. I am therefore filing this formal complaint.

In the itemized receipts of the Grumman Political Action Committee's December 1979 report, there appears a receipt for \$3,020.37 given by Raymond Montano of 200 S. Vandorn St., Alexandria, Virginia 22304. Mr. Montano, at the time acted as the Senior Cost Analyst for Grumman Aerospace Corporation, Bethpage, New York 11714. This contribution of December, 1979 brought Mr. Montano's aggregate contribution to the Grumman PAC to \$5745.71 which exceeds the \$5000 limit specified in the above mentioned section of the law (see attached sheet #1).

In addition, I would like to point out the contribution of Mr. Robert Fluor, Chairman of the Board, President and Chief Executive Officer of the Fluor Corporation. In 1979, Mr. Fluor also exceeded the limit established in §441a. (1)(C) with his contribution totaling \$5062.24 as of December 29, 1979 (see attached sheet #2).

I hereby conclude by stating that all allegations and statements contained in this formal complaint are, to the best of my knowledge, true.

Sincerely,

Mark J. Sadoff
Mark J. Sadoff, staff

Encl: (2) two

DISTRICT OF COLUMBIA

Subscribed and sworn to before me this

11 Day of June, 1980
Edward E. Gorman
Notary Public

SCHEDULE A
REVISED
January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3Page 12 of 12 for

Line Number 15

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
GRUCIAN POLITICAL ACTION COMMITTEE		(EXEMPT LEGAL & ACCOUNTING FEES)	
Full Name, Mailing Address and ZIP Code Raymond Montano 200 S. Vandorn St. Alexandria, VA 22304	Principal Place of Business Grucian Aerospace Corp. Bethpage, NY 11714 Occupation Senior Cost Analyst	Date (month, day, year) 12/1 thru 12/31/79	Amount of each Receipt this Period 3,020.37
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Appropriate Year To Date \$ 3,745.71		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Appropriate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Appropriate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Appropriate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Appropriate Year To Date \$		
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Appropriate Year To Date \$		
CUSTOTAL of receipts this page (optional)			\$ 3,020.37
TOTAL this period (print on this line number only)			\$

81000041762
1110037

001222-01

FLUOR CORPORATION
PUBLIC AFFAIRS COMMITTEE ITEMIZED RECEIPT
01 OCT 79 THRU 29 DEC 79

PAGE 2

NAME AND ADDRESS	CLASSIFICATION	TYPE OF CONTRIB	DATE OF CONTRIB.	AMOUNT CONTRIBUTED
ELLICK THOMAS C 24342 DUNNICK COURT LAGUNA HILLS	VP, CORPORATE RELATIONS CA 92677	CONTIN.	07 OCT 79	22.50
		CONTIN.	21 OCT 79	22.50
		CONTIN.	04 NOV 79	22.50
		CONTIN.	18 NOV 79	22.50
		CONTIN.	02 DEC 79	22.50
		CONTIN.	16 DEC 79	22.50
01 23199 533-28-4408	AGGREGATE YEAR-TO-DATE	510.00	CONTRIBUTOR TOTAL	132.00
BLUM J ROBERT P O BOX 2147 NEWPORT BEACH	CHAIRMAN, PRESIDENT & CEO CA 92661	CONTIN.	07 OCT 79	142.90
		CONTIN.	21 OCT 79	142.90
		CONTIN.	04 NOV 79	142.90
		CONTIN.	18 NOV 79	142.90
		CONTIN.	02 DEC 79	142.90
		CONTIN.	16 DEC 79	142.90
01 00094 573-03-0639	AGGREGATE YEAR-TO-DATE	5,062.25	CONTRIBUTOR TOTAL	2,597.00
GOODMAN WILLIAM C 1601 AMHERST DR SANTA ANA	SP AREA SUPV, FACIL SVCS CA 92704	CONTIN.	07 OCT 79	1.00
		CONTIN.	21 OCT 79	1.00
		CONTIN.	04 NOV 79	1.00
		CONTIN.	18 NOV 79	1.00
		CONTIN.	02 DEC 79	1.00
		CONTIN.	16 DEC 79	1.00
01 31931 355-07-3053	AGGREGATE YEAR-TO-DATE	24.00	CONTRIBUTOR TOTAL	6.00
NESSLYN GEORGE H 7422 ELDER AVENUE WHITTIER	ASST CORP CONTROLLER CA 90607	CONTIN.	07 OCT 79	4.00
		CONTIN.	21 OCT 79	4.00
		CONTIN.	04 NOV 79	4.00
		CONTIN.	18 NOV 79	4.00
		CONTIN.	02 DEC 79	4.00
		CONTIN.	16 DEC 79	4.00
01 36644 204-14-2763	AGGREGATE YEAR-TO-DATE	24.00	CONTRIBUTOR TOTAL	24.00
HUMBERT R D 1921 GALATIA TERRACE CORNIDA DEL MAR	VP LAW, TAX & SECRETARY CA 92629	CONTIN.	07 OCT 79	46.00
		CONTIN.	21 OCT 79	46.00
		CONTIN.	04 NOV 79	46.00
		CONTIN.	18 NOV 79	46.00
		CONTIN.	02 DEC 79	46.00
		CONTIN.	16 DEC 79	46.00
01 39216 469-12-8705	AGGREGATE YEAR-TO-DATE	1,290.00	CONTRIBUTOR TOTAL	276.00

Attached Sheet #2



FEDERAL ELECTION COMMISSION

1325 K STREET NW
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 1247

Date Filmed May 12, 1981 Camera No. --- 2

Cameraman DPC